



Environmental Review Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

CENTRAL CITY COMMUNITY PLAN AREA

Broadway@4th Project

Case No. ENV-2013-3187-MND

Council District No. 14

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Addresses:

Los Angeles, California 90013:

400, 410, 412, 414, 418, 420, 422 South Broadway
218, 230 West 4th Street

Project Description:

The Project Site contains four parcels with a total Lot Area of 34,253 square feet (0.786 acres), prior to vacation of the 5 foot dedication on Broadway and 13 foot dedication on 4th Street. If the 5 foot and 13 foot dedications are vacated, the total area would be 37,529 square feet (0.8615 acres). The Site is zoned [Q]C4-4D-CDO. The Project Site is located within the Central City Community Plan and the Broadway Community Design Overlay. The Site is bound by 4th Street to the north, Broadway to the west, Frank Ct (alley) to the east, and a 10-story residential apartment building (The Judson) with ground-floor retail to the south. The Project Site currently contains a one-story, 14,000 square foot commercial building with ground and roof-top parking, which would be removed in order to accommodate the Project. The Project proposes a mixed-use development consisting of a 34-story, high-rise residential tower with associated support spaces such as parking, resident amenity facilities, storage rooms, bicycle storage, lobby circulation, and service spaces. The Project would include 450 residential units and 6,904 square feet of ground floor commercial space. A total of 450 parking spaces will be provided in two subterranean and six podium levels. The proposed Project consists of a total of 444,099 square feet of floor area. The Project would export approximately 27,777 cubic yards of dirt.

Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5, the Applicant requests a Transfer of Floor Area Rights (TFAR) from the Los Angeles Convention Center (Donor Site) to the Project Site (Receiver Site). The Applicant is requesting a maximum transfer of 238,581 square feet of floor area to the Receiver Site. Pursuant to LAMC Section 17.01, the Applicant requests approval of a Tentative Tract map (Tract No. TT-72418-CN), to permit the creation of 450 apartment/condominium units, one (1) commercial condominium, and one (1) parking condominium unit. Pursuant to LAMC Section 13.08, the Applicant requests a Design Overlay Plan Approval within the Broadway Theater and Entertainment District Community Design Overlay (CDO, Ordinance 180,871). Pursuant to LAMC Section 12.32, the Applicant requests a Zone Change to amend [Q] Qualified Condition Number 11 of Ordinance 180,871 to permit a reduced floor to ceiling height of 10 feet, in lieu of 15 feet, for 6,525 square feet of the ground floor. Pursuant to LAMC Section 12.27, the Applicant requests the following Zone Variances: a Zone Variance from LAMC Section 12.21 A.5(a)(1) to reduce the parking stall width for 88 residential standard parking spaces from the code-required 8'-6" to 8'-4"; a Zone Variance from LAMC Section 12.21 A.5(b) to reduce the drive aisle width for the ground floor, floors B1, B2, 2, 3, 4, 5, and 6 from the code-required 28'-0" to 26'-8"; a Zone Variance from LAMC Section 12.21 G.2.(3) to reduce the

number of required on-site trees from 113 to 84, with the remaining 29 trees to be planted off-site; and a Zone Variance from LAMC Section 17.15 C to permit construction to commence for the buildings in conjunction with an approval of Tentative Tract No. 72418 prior (Early Start) to recordation of the Final Tract Map. Pursuant to LAMC Section 12.21 G.3, the Applicant requests a Director's Decision to allow a 4.3% reduction from the Open Space required in LAMC Section 12.21 G for a total open space of 46,887 square feet in lieu of the required 48,975 square feet. Pursuant to LAMC Section 16.05, the Applicant requests that Site Plan Review findings be made as part of the discretionary approvals. The Applicant also requests a Haul Route approval in order to export approximately 27,777 cubic yards of dirt.

APPLICANT:

Grand Pacific 728, LLC

PREPARED FOR:

Los Angeles Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC

**CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION**

LEAD CITY AGENCY:
City of Los Angeles, Planning Department

COUNCIL DISTRICT:
14

PROJECT TITLE:
ENV-2013-3187-MND

RELATED CASE NOS.
CPC-2014-326-TDR-ZV-ZAA-CDO-SPR

PROJECT LOCATION: 400 South Broadway, Los Angeles, CA 90013

PROJECT DESCRIPTION:

The Project Site contains four parcels with a total Lot Area of 34,253 square feet (0.786 acres), prior to vacation of the 5 foot dedication on Broadway and 13 foot dedication on 4th Street. If the 5 foot and 13 foot dedications are vacated, the total area would be 37,529 square feet (0.8615 acres). The Site is zoned [Q]C4-4D-CDO. The Project Site is located within the Central City Community Plan and the Broadway Community Design Overlay. The Site is bound by 4th Street to the north, Broadway to the west, Frank Ct (alley) to the east, and a 10-story residential apartment building (The Judson) with ground-floor retail to the south. The Project Site currently contains a one-story, 14,000 square foot commercial building with ground and roof-top parking, which would be removed in order to accommodate the Project. The Project proposes a mixed-use development consisting of a 34-story, high-rise residential tower with associated support spaces such as parking, resident amenity facilities, storage rooms, bicycle storage, lobby circulation, and service spaces. The Project would include 450 residential units and 6,904 square feet of ground floor commercial space. A total of 450 parking spaces will be provided in two subterranean and six podium levels. The proposed Project consists of a total of 444,099 square feet of floor area. The Project would export approximately 27,777 cubic yards of dirt.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Grand Pacific728, LLC 206 W. 6th Street, Suite 100, Los Angeles, CA 90014

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2).

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM
Jennifer Karmels

TITLE
City Planning Associate

TELEPHONE NUMBER
213-978-1165

ADDRESS
200 North Spring Street
Los Angeles, California 90012

SIGNATURE (Official)



DATE

11/05/14

**Table 1-1
Summary of Mitigation Measures**

No.	Mitigation Measure
Aesthetics	
1-1	<p>Aesthetics (Balconies)</p> <ul style="list-style-type: none"> Balconies on the podium levels (floors 1 through 10) shall not project from the building façade. Balconies on the tower (floors 11 through 34) shall not project more than 12 inches from the building façade.
1-2	<p>Aesthetics (Tower)</p> <ul style="list-style-type: none"> The tower portion of the building (floors 11 through 34) shall cover no less than 30 percent of the total lot area and no more than 31.5 percent of the total lot area. Balconies shall be counted when determining lot coverage.
1-3	<p>Aesthetics (Landscape Plan)</p> <p>All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec.12.40-D) and to the satisfaction of the decision maker.</p>
1-4	<p>Aesthetics (Signage)</p> <ul style="list-style-type: none"> On-site signs shall be limited to the maximum allowable under the Municipal Code, the Broadway Community Design Overlay, and Ordinance 180,871. Multiple temporary signs in store windows and along building walls are not permitted.
1-5	<p>Aesthetics (Vandalism)</p> <ul style="list-style-type: none"> Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104. The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.
1-6	<p>Aesthetics (Signage on Construction Barriers)</p> <ul style="list-style-type: none"> The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS". Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.
1-7	<p>Aesthetics (Light)</p> <p>Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.</p>

1-8	<p>Aesthetics (Glare)</p> <p>The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.</p>
Air Quality	
3-1	<p>Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes.</p>
3-2	<p>Architectural Coating</p> <ul style="list-style-type: none"> • The project shall utilize only low- and non-VOC containing paints, sealants, adhesives, and solvents in the construction of the project. The average VOC content of the coating shall be 50 g/L for all interior surfaces and 75 g/L for all exterior surfaces.
3-3	<p>Air Pollution (Demolition, Grading, and Construction Activities)</p> <ul style="list-style-type: none"> • All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. • All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of dust. • All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. • All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. • Trucks having no current hauling activity shall not idle but be turned off. • To reduce on-site construction related air quality emissions, the Project Applicant shall ensure all construction equipment meet or exceed Tier 3 off-road emission standards.
3-4	<p>Air Pollution (Operational)</p> <p>The building shall not include fireplaces in any residential units or common areas.</p>
Biology	
4-1	<p>Tree Removal (Public Right-of-Way)</p> <ul style="list-style-type: none"> • Removal of trees in the public right-of-way requires approval by the Board of Public Works. • The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077). • The plan shall contain measures recommended by the tree expert for the

	<p>preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway, and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.</p> <ul style="list-style-type: none"> All trees in the public right-of-way shall be provided per the current Urban Forestry Division Standards.
<p>Cultural Resources</p>	
<p>5-1</p>	<p>Cultural Resources (Archaeology)</p> <ul style="list-style-type: none"> If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the areas of archaeological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent archaeological resources), and: <ul style="list-style-type: none"> The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Register of Professional Archaeologists (ROPA) or a ROPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report. Project development activities may resume once copies of the archaeological survey, study, or report are submitted to: SCCIC Department of Anthropology McCarthy Hall 477 CSU Fullerton 800 North State College Boulevard Fullerton, CA 92843 A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.
<p>5-2</p>	<p>Cultural Resources (Paleontology)</p> <ul style="list-style-type: none"> If any paleontological materials are encountered during the course of Project development, all further development activities shall halt in the areas of paleontological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent paleontological resources), and: <ul style="list-style-type: none"> The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or

	<p>relocation of the resource.</p> <ul style="list-style-type: none"> c. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report. d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum. e. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations. <ul style="list-style-type: none"> • A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.
5-3	<p>Cultural Resources (Human Remains)</p> <ul style="list-style-type: none"> • In the event that human remains are discovered during excavation activities, the following procedure shall be observed: <ul style="list-style-type: none"> a. Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays) b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance. f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.
Geology and Soils	
6-1	<p>Erosion/Grading/Short-Term Construction Impacts</p> <ul style="list-style-type: none"> • The Applicant shall provide a staked signage at the Site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. • Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures: <ul style="list-style-type: none"> a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15

	<p>through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.</p> <p>b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.</p>
6-2	<p>Grading (20,000 Cubic Yards, or 60,000 Square Feet of Surface Area or Greater)</p> <ul style="list-style-type: none"> • A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated. • "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts. • "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities. • Movement and removal of approved fencing shall not occur without prior approval by LADBS.
6-3	<p>Geotechnical Report</p> <ul style="list-style-type: none"> • Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. • The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.
Hazards and Hazardous Materials	
8-1	<p>Explosion/Release (Existing Toxic/Hazardous Construction Materials)</p> <ul style="list-style-type: none"> • (Asbestos) Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the

	building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.
Hydrology and Water Quality	
9-1	<p>Stormwater Pollution (Demolition, Grading, and Construction Activities)</p> <ul style="list-style-type: none"> • Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life. • Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. • All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills. • Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. • Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.
Noise	
12-1	Construction staging areas shall be as far from the adjacent multi-family residences at 424 South Broadway as possible.
12-2	<p>Increased Noise Levels (Sound Barrier)</p> <p>Temporary sound barriers, capable of achieving a sound attenuation of at least 9 dBA (e.g., construction sound wall or sound blankets) and blocking the line-of-sight between the adjacent sensitive receptors shall be installed on the southern boundary of the project site between the proposed project and the Judson Rives Building, located at 424 South Broadway. The barrier shall be tall enough to block the line of site from the top of the windows on the Judson Rives Building to any excavation activities facing the Judson Rives Building. The barrier shall have a Sound Transmission Class of 35 or more and include exterior grade acoustical blankets that provide sound absorption and further reduce the reflection of sound waves.</p>
12-3	<p>Increased Noise Levels (Demolition, Grading, and Construction Activities)</p> <ul style="list-style-type: none"> • The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. • 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. • Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. • The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
12-4	<p>Increased Noise Levels (Parking Structure Ramps)</p> <p>Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:</p> <ul style="list-style-type: none"> • Concrete, not metal, shall be used for construction of parking ramps. • The interior ramps shall be textured to prevent tire squeal at turning areas.
12-5	<p>Increased Noise Levels (Mixed-Use Development)</p> <ul style="list-style-type: none"> • Wall and floor-ceiling assemblies separating commercial tenant spaces,

	<p>residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.</p>
12-6	<p>Temporary Groundborne Vibration Impacts During Construction</p> <ul style="list-style-type: none"> • All new construction work shall be performed so as not to adversely affect the historic designation of the Judson Building located immediately adjacent to the site at 424 South Broadway. Preconstruction surveys shall be performed to document conditions of the adjacent historic structure. The structural monitoring program shall be implemented and recorded during construction. • The performance standards of the structure monitoring plan shall include the following: <ul style="list-style-type: none"> ○ Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the building. A registered civil engineer or certified engineering geologist 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 historic resources 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. ○ The structure monitoring program shall be submitted to the Department of City Planning, the Office of Historic Resources, and the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to initiating any construction activities. ○ The Applicant shall retain a qualified vibration consultant to take vibration monitoring measurements regularly in order to assess the actual impact of vibration on adjacent structures and to incorporate and adjust techniques as necessary to reduce impact. ○ The Applicant shall retain an experienced vibration engineer to plan for and monitor vibration impacts on the adjacent historic Judson building during site clearing, earthmoving and foundation construction, and structural construction, to the extent that the adjacent historic Judson building allows the Applicant to conduct monitoring within the building and to understand the baseline vibration impacts prior to site-clearing. The engineer shall insure the incorporation of maximum vibration mitigation into every phase of Project development.
12-7	<p>Increased Groundborne Vibration (Demolition, Grading and Construction Activities)</p> <ul style="list-style-type: none"> • Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible. • The construction contractor shall stage and warm-up construction equipment as far from nearby sensitive receptors as possible. • The construction contractor shall avoid utilizing high vibration construction equipment (e.g. large bulldozers) near surrounding sensitive receptors, to the maximum extent feasible.

	<ul style="list-style-type: none"> • The construction contractor shall avoid using vibratory rollers and packers near sensitive areas. • The construction contractor shall avoid impact pile-driving where possible. The construction contractor shall use drilled piles or the use of a sonic or vibratory pile driver where geological conditions permit their use.
Public Services	
14-1	<p>Public Services (Fire)</p> <p>The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.</p>
14-2	<p>Public Services (Police – Demolition/Construction Sites)</p> <p>Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.</p>
14-3	<p>Public Services (Police)</p> <p>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.</p>
Transportation and Traffic	
16-1	<p>Transportation (Haul Route)</p> <ul style="list-style-type: none"> • The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety. • (<i>Non-Hillside</i>): Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.
16-2	<p>Safety Hazards</p> <ul style="list-style-type: none"> • The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety. • The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.
16-3	<p>LADOT Project Requirements for Construction Impacts</p> <ul style="list-style-type: none"> • A Construction Work Site Traffic Control Plan shall be submitted to the Department of Transportation for review and approval prior to the start of any construction work. The Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Department of

	Transportation also recommends that all construction related traffic be restricted to off-peak hours.
16-4	<p>Emergency Access</p> <p>The Applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access.</p>
16-5	<p>Pedestrian Access During Construction</p> <p>The applicant shall maintain a clear path of travel for pedestrians along the entire Project Site frontage throughout the duration of construction activities.</p>
Utilities and Service Systems	
17-1	<p>Utilities (Wastewater – Construction)</p> <p>As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project’s wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity.</p>
17-2	<p>Utilities (Wastewater)</p> <p>The Project Applicant shall implement any upgrade to the wastewater system serving the Project Site that is needed to meet municipal requirements.</p>
17-3	<p>Utilities (Local Water Supplies – Landscaping)</p> <p>Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:</p> <ul style="list-style-type: none"> • The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). • In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following: <ul style="list-style-type: none"> • Weather-based irrigation controller with rain shutoff • Matched precipitation (flow) rates for sprinkler heads • Drip/microspray/subsurface irrigation where appropriate • Minimum irrigation system distribution uniformity of 75 percent • Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials • Use of landscape contouring to minimize precipitation runoff • A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf. and greater.
17-4	<p>Utilities (Local Water Supplies - All New Construction)</p>

	<p>Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:</p> <ul style="list-style-type: none"> • If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate. • Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. • Install restroom faucets with a maximum flow rate of 1.5 gallons per minute. • A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses. • Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)
17-5	<p>Utilities (Local Water Supplies - New Commercial or Industrial)</p> <p>Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:</p> <ul style="list-style-type: none"> • All restroom faucets shall be of a self-closing design.
17-6	<p>Utilities (Local Water Supplies - New Residential)</p> <p>Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:</p> <ul style="list-style-type: none"> • Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute. • Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. • Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
17-7	<p>Utilities (Solid Waste Recycling)</p>

	<p>Environmental impacts may result from project implementation due to the creation of additional solid waste. However, this potential impact will be mitigated to a less than significant level by the following measure:</p> <ul style="list-style-type: none"> • <i>(Operational)</i> Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program. • <i>(Construction/Demolition)</i> Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. • <i>(Construction/Demolition)</i> To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.
17-8	<p>Utilities (Solid Waste Disposal) All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.</p>

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
and CHECKLIST
(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT: 14	DATE:
RESPONSIBLE AGENCIES: Department of City Planning			
ENVIRONMENTAL CASE: ENV-2013-3187-MND		RELATED CASES: CPC-2014-326-TDR-ZV-ZAA-CDO-SPR	
PREVIOUS ACTIONS CASE NO.: N/A		<input type="checkbox"/> Does have significant changes from previous actions. <input checked="" type="checkbox"/> Does NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: See Section 2 (Project Description), of this IS/MND			
ENV PROJECT DESCRIPTION: See Section 2 (Project Description), of this IS/MND			
ENVIRONMENTAL SETTINGS: See Section 2 (Project Description), of this IS/MND			
PROJECT LOCATION: 400 South Broadway, Los Angeles, CA 90013			
COMMUNITY PLAN AREA: Central City		AREA PLANNING COMMISSION: Central	CERTIFIED NEIGHBORHOOD COUNCIL: Downtown Los Angeles
STATUS: <input type="checkbox"/> Preliminary <input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Proposed <input type="checkbox"/> Does NOT Conform to Plan <input checked="" type="checkbox"/> ADOPTED			
EXISTING ZONING: [Q]C4-4D-CDO		MAX DENSITY ZONING: 6:1 FAR	
GENERAL PLAN LAND USE: Regional Center Commercial		MAX DENSITY PLAN: 6:1 FAR	
		PROPOSED PROJECT DENSITY: 11.8:1 FAR (with TFAR)	

Determination (To Be Completed By Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

City Planning Associate

213-978-1165

Title

Phone

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 16063 (c)(3)(D). In this

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- case, a brief discussion should identify the following:
- a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 7. **Supporting Information Sources:** A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
 9. **The explanation of each issue should identify:**
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

All "Potentially Significant Impact" would be reduced to less than significant levels with the mitigation measures.

<input checked="" type="checkbox"/> AESTHETICS <input type="checkbox"/> AGRICULTURAL RESOURCES <input checked="" type="checkbox"/> AIR QUALITY <input type="checkbox"/> BIOLOGICAL RESOURCES <input checked="" type="checkbox"/> CULTURAL RESOURCES <input checked="" type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input checked="" type="checkbox"/> HYDROLOGY AND WATER QUALITY <input type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input checked="" type="checkbox"/> NOISE <input type="checkbox"/> POPULATION AND HOUSING	<input checked="" type="checkbox"/> PUBLIC SERVICES <input type="checkbox"/> RECREATION <input checked="" type="checkbox"/> TRANSPORTATION/CIRCULATION <input checked="" type="checkbox"/> UTILITIES <input type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
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INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

Background

PROPONENT NAME:

Grand Pacific 728, LLC

PHONE NUMBER:

(213) 623-3811

APPLICANT ADDRESS:

206 West 6th Street, Suite 100, Los Angeles CA 90014

AGENCY REQUIRING CHECKLIST:

City of Los Angeles Department of City Planning

DATE SUBMITTED:

10/10/2013

PROPOSAL NAME (if Applicable):

Broadway@4th Project

Please note that each and every response in the City of Los Angeles Initial Study and Checklist is summarized from and based upon the environmental analysis contained in Section 4 (Environmental Impact Analysis), explanation of checklist determinations. Please refer to the applicable response in Section 4 (Environmental Impact Analysis) for a detailed discussion of checklist determinations.

ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project, and forest carbon measurement mythology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Production (as defined by Government Code section 51104 (g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. AIR QUALITY. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM ₁₀) under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance(e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. HYDROLOGY AND WATER QUALITY. Would the proposal result in:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Map or other flood hazard delineation map?				
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. NOISE. Would the project:				
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ambient noise levels in the project vicinity above levels existing without the project?				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. PUBLIC SERVICES.				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
15. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16. TRANSPORTATION AND TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets of necessary)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as ENV-2013-3187-MND and the associated case(s), CPC-2013-326-TDR-ZV-ZAA-CDO-SPR. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impact(s) on the environment (after mitigation) **will not:**

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses and phone numbers: visit the City's website at <http://www.lacity.org>; City Planning – and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps – <http://gmw.consrv.ca.gov/shmp/>

Engineering/Infrastructure/Topographic Maps/Parcel Information – <http://boemaps.eng.ci.la.ca.us/index01.htm> or City's main website under the heading "Navigate LA."

PREPARED BY: Jennifer Karmels	TITLE: City Planning Associate	TELEPHONE NO.: (213) 978-1165	DATE:
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2. PROJECT DESCRIPTION

PROJECT APPLICANT

The Project Applicant is Grand Pacific 728, LLC, 206 West 6th Street, Suite 100, Los Angeles, CA 90014.

ENVIRONMENTAL SETTING

Project Location

The Project Site (or Site) is generally located at 400 S. Broadway (Assessor Parcel Numbers , at the southern corner of Broadway and 4th Street, in the Central City Community Plan Area of the City of Los Angeles. The Site is bounded by Broadway to the west, 4th Street to the north, Frank Court alley to the east, and a multi-family residential building to the south.

See Figure 2-1, Regional and Vicinity Map, for the location within the context of the City. See Figure 2-2, Aerial Map, for the Project Site and surrounding areas.

Regional Setting

The Site is located in the Central City Community Plan Area in the City of Los Angeles (City), in the southwest corner of Downtown Los Angeles. The Community Plan area is located south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (Interstate 110), and west of Alameda Street. It is bordered by the following communities: Central City North, Silver Lake-Echo Park, Westlake, Southeast, and South Central Los Angeles.

The Community Plan area is composed of nine districts: Civic Center, Bunker Hill, Financial Core, Convention Center/Arena, South Park, Center City/Historic Core, Little Tokyo, Central City East, and South Markets. The Project Site is located within the Historic Core.

Access

Regional access to the Project Site is provided by the Harbor Freeway (I-110), located approximately 3,000 feet northwest of the Project Site and the Hollywood Freeway (US-101) located approximately 3,400 feet northeast of the Project Site.

Local access is provided by Broadway, Spring Street, 4th Street, 5th Street, and Frank Ct (alley).

Public Transit

The Project would be considered a transit-oriented development based on the Site's proximity to Los Angeles County Metropolitan Transportation Authority (Metro) bus lines and the Metro rail lines.

Metro operates a rail system, which travels between downtown Los Angeles and surrounding communities. Located one block northwest of the site at 4th Street and Hill Street is the Pershing Square Station, a Metro rail station served by the Red Line and Purple Line.

Metro operates many local and limited stop routes within walking distance of the Project Site. Metro bus lines 2/302, 4, 30/330, 40, 45, 84/68 have a stop at 4th Street and Broadway. Metro bus lines 92, 33, 83, 733 have a stop at Spring Street and 4th Street.

Los Angeles Department of Transportation (LADOT) line DASH Downtown has a stop at 4th Street and Spring Street.

Metro is building a Regional Connector which will provide a station at Broadway and 2nd Street.¹ Metro will also operate the upcoming Broadway Streetcar, which will run south along Broadway to South Park and north along Figueroa Street and Hill Street.²

Site Characteristics and Uses

Size and Boundaries

The Project Site contains four parcels with a total Lot Area of 34,253 square feet (0.786 acres), prior to vacation of the 5 foot dedication on Broadway and 13 foot dedication on 4th Street.

The applicant has requested the vacation of a 5 foot dedication along the Broadway frontage and a 13 foot dedication along the 4th Street frontage. If vacated, the total site area would be 37,529 square feet (0.8615 acres).

The Site is bounded as follows:

- north by 4th Street
- west by Broadway
- east by Frank Ct (alley)
- south by a 10-story residential apartment building (The Judson) with ground-floor retail

¹ Metro Regional Connector: <http://www.metro.net/projects/connector/>

² Broadway Streetcar: <http://www.bringingbackbroadway.com/Initiatives/STREETCAR/ROUTE/index.htm>

Existing Uses

The Site currently contains a one 1-story, 14,000 square feet commercial building with ground and roof-top parking. The design and layout of the building has nine retail stores along the Broadway frontage and one additional store having duel frontage along the corner of Broadway and 4th Street. The parking garage is behind these stores on the ground floor and also the entire roof. The parking area is 58,899 square feet (166 spaces) on 2 levels. Parking access is provided with one entrance on Broadway, one entrance on 4th Street, and one exit on 4th Street. The existing building was developed in 1985 and would be entirely removed as part of the Project.

There is no landscaping on the Site. The sidewalk along 4th Street contains 2 mature trees in a small dirt plot adjacent to the curb. The sidewalk along Broadway contains 2 immature trees each individually contained in a small moveable sidewalk planter. The Project would not impact the sidewalk.

The existing Site is shown in Figures 2-3 through 2-9, Views of the Project Site.

The Site information is listed in Table 2-1, Project Site.

**Table 2-1
Project Site**

Address	APN	Zone	General Plan Land Use	Lot Area (sf)
400, 410 S Broadway, 230 W 4 th Street	5149-024-021	[Q] C4-4D-CDO	Regional Center Commercial	34,253
218 W 4 th Street	5149-024-022			
412, 414, 418 S Broadway	5149-024-020			
420, 422 S Broadway	5149-024-019			
Area prior to vacation on Broadway and 4th Street				34,253
+ 13 foot vacation on 4 th Street and 5 foot vacation on Broadway				3,276
Area after vacation on Broadway and 4th Street				37,529
<i>Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org/ Source (area): Hamid Behdad, Project Advisor, Central City Development Group, July 8, 2013. Table by CAJA Environmental Services, June 2013</i>				

Zoning Information

The Site is zoned [Q]C4-4D-CDO:

- [Q] – Qualified Classification, or restrictions on a property as a result of a zone change, to ensure compatibility with surrounding property.
- C4 – Commercial Zone, which allows C2 uses with limitations, and R4 (Multiple Dwelling) uses.
- 4 – Height District 4, which for a C zone, allows for 13:1 FAR (floor-area-ratio).

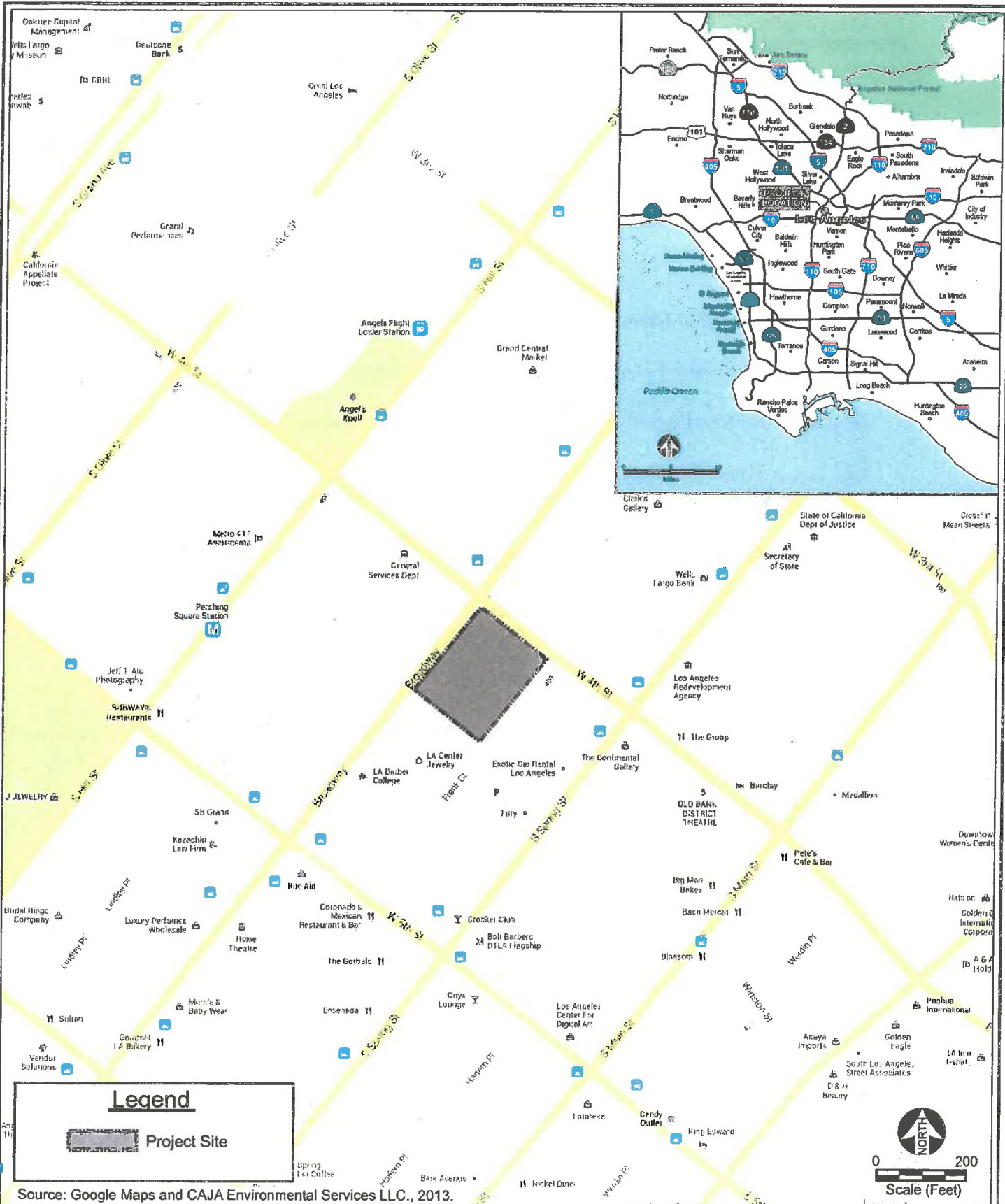
- D – Development Limitation, which restricts floor area ratio to 6:1, unless a Transfer of Floor Area is approved.
- CDO – Community Design Overlay - Broadway Theater and Entertainment District Design Guide Community Design Overlay (Ord. No. 180,871)

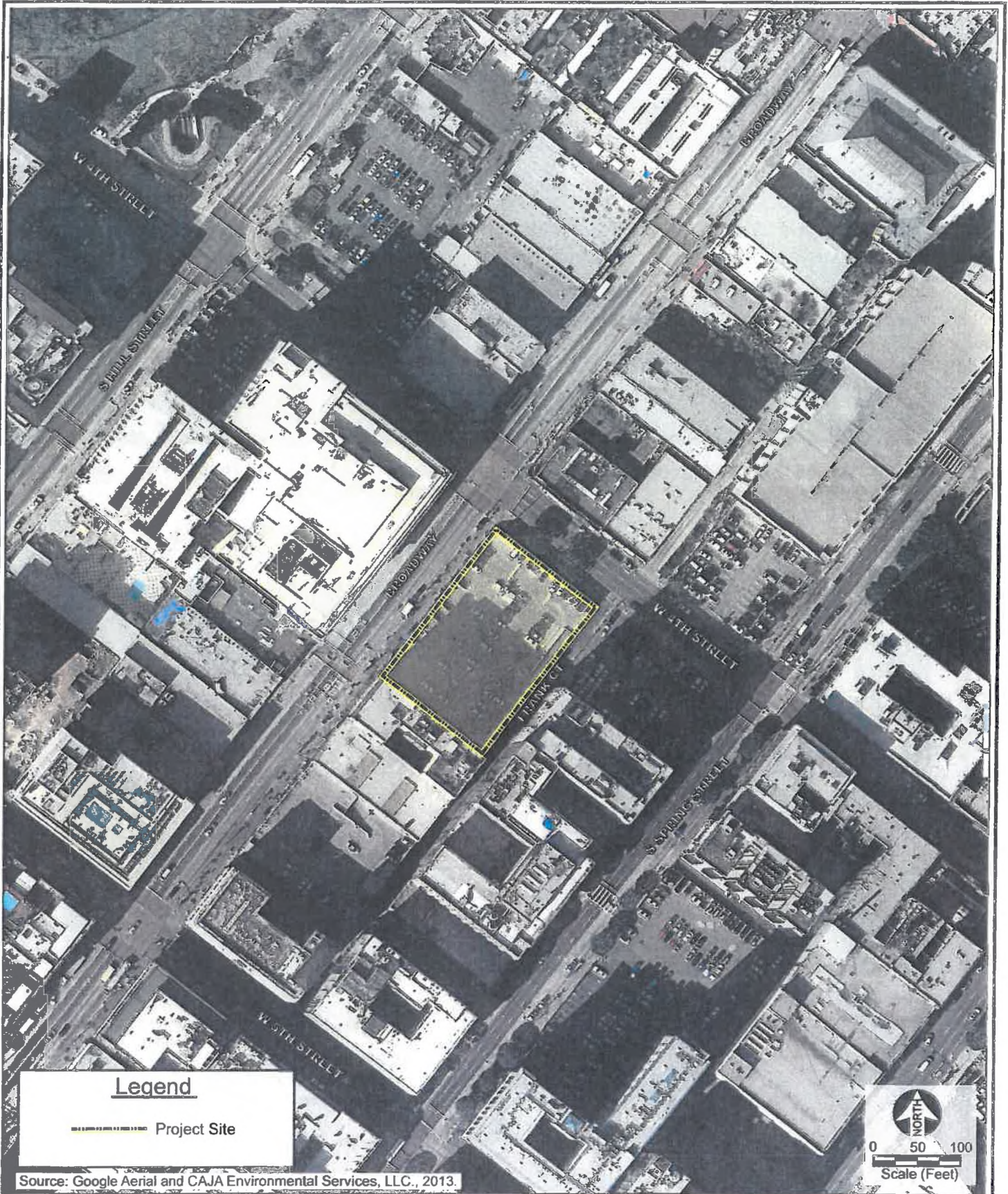
Surrounding Uses

The surrounding uses are as follows:

- North across 4th Street is a 1- and 2-story commercial/retail building (zoned [Q] C4-4D-CDO)
- West across Broadway is a 10-story office building (Junipero Serra Building) (zoned PF-4D-CDO)
- East across Frank Ct (alley) is surface parking (zoned [Q] C4-4D-CDO) and a 13-story office building (Title Insurance Building)
- South adjacent to the Site is a 10-story residential apartment building (The Judson) with ground-floor clothing retail.

The surrounding uses are shown in Figures 2-10 through 2-15, Views of the Surrounding Uses.





Legend

Project Site

Source: Google Aerial and CAJA Environmental Services, LLC., 2013.





View 1: View south on Frank Court alley; Project Site existing building is on the right.



View 2: View south on Frank Court alley; Project Site existing building is on the right.



View 3: View south on Frank Court alley; Project Site existing building is on the right.



View 4: View north on Frank Court alley toward 4th Street; Project Site existing building is on the left.

Source: CAJA Environmental Services, LLC, June 2013.



View 5: View west on 4th Street; Project Site existing building and parking entrance are on the left.



View 6: View into the Project Site existing building's parking entrance on 4th Street.



View 7: View west on 4th Street; Project Site existing building is on the left.



View 8: View east on 4th Street; Project Site existing building is on the right.

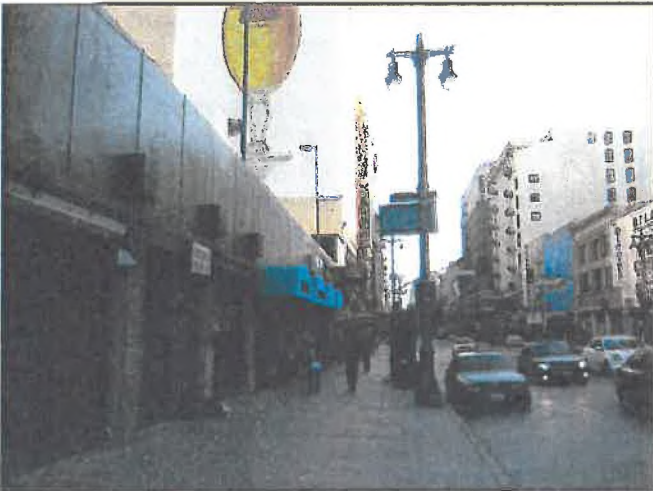
Source: CAJA Environmental Services, LLC, June 2013.



View 9: View at Project Site existing building on the corner of 4th Street and Broadway.



View 10: View south on Broadway; Project Site existing building is on the left.



View 11: View south on Broadway; Project Site existing building is on the left.



View 12: View south on Broadway; Project Site existing building façade.

Source: CAJA Environmental Services, LLC, June 2013.



View 13: View north on Broadway; Project Site existing building is on the right.



View 14: View south on Broadway; Project Site existing building is on the left.



View 15: View north on Broadway; Project Site existing building is on the right.



View 16: View into the Project Site existing building's parking entrance on Broadway.

Source: CAJA Environmental Services, LLC, June 2013.



View 17: View east across Broadway toward Project Site existing building.



View 18: View east across Broadway toward Project Site existing building.



View 19: View east across Broadway toward Project Site existing building.



View 20: View east across Broadway toward Project Site existing building.

Source: CAJA Environmental Services, LLC, June 2013.



View 21: View south across 4th Street toward Project Site existing building.



View 22: View south across 4th Street toward Project Site existing building.



View 23: View southwest across 4th Street toward Project Site existing building.

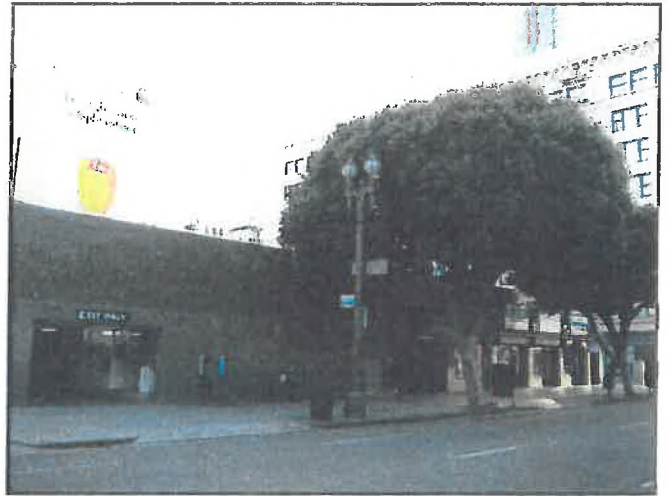


View 24: View south across 4th Street toward Project Site existing building and parking entrance.

Source: CAJA Environmental Services, LLC, June 2013.



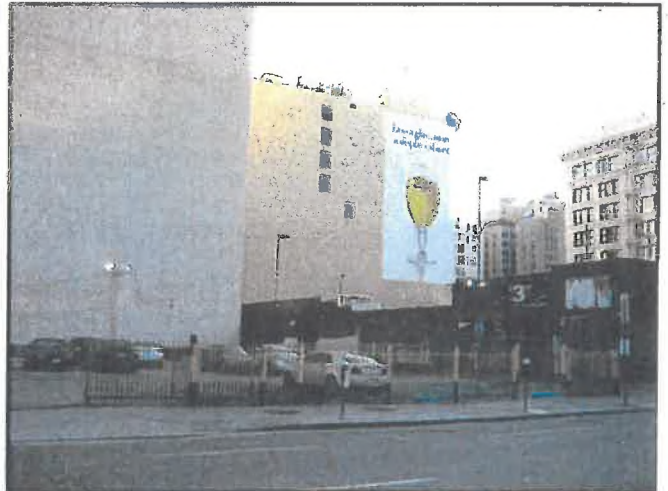
View 25: View south across 4th Street toward Frank Court alley and Project Site existing building on the right.



View 26: View southwest across 4th Street toward Project Site existing building.



View 27: View southwest across 4th Street toward Frank Court alley and Project Site existing building.



View 28: View southwest across 4th Street toward Frank Court alley and Project Site existing building.

Source: CAJA Environmental Services, LLC, June 2013.



View 1: View west on corner of 4th Street and Spring Street toward Bunker Hill.



View 2: View west on Spring Street across adjacent surface parking lot and rear of Project Site.

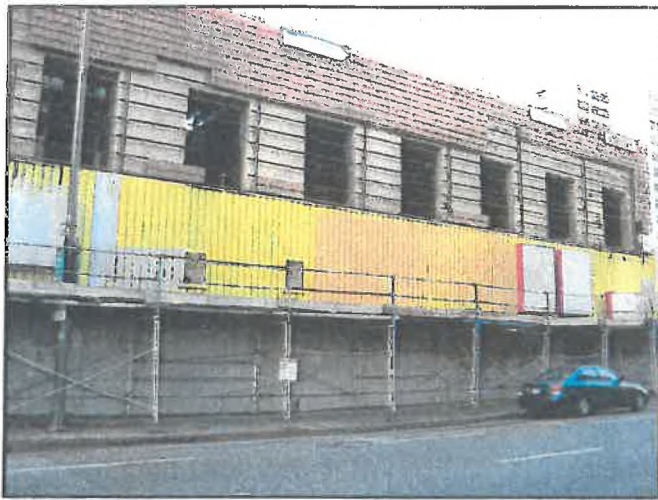


View 3: View northwest across 4th Street toward commercial/retail uses and Bunker Hill skyscrapers.



View 4: View east on 4th Street toward Spring Street and Old Bank District buildings.

Source: CAJA Environmental Services, LLC, June 2013.



View 5: View northeast across 4th Street toward commercial/retail uses (under renovation).



View 6: View northeast across 4th Street toward commercial/retail uses (under renovation).



View 7: View north across 4th Street toward commercial/retail uses at corner of 4th Street and Broadway.



View 8: View west on 4th Street across Broadway toward Bunker Hill.

Source: CAJA Environmental Services, LLC, June 2013.



View 9: View west on 4th Street across Broadway toward Junipero Serra Office Building.



View 10: View north at corner of 4th Street and Broadway toward commercial/retail uses (under renovation).



View 11: View south on sidewalk on Broadway; adjacent Judson apartment building is visible (part of the beer glass advertising).



View 12: View southwest across Broadway toward Junipero Serra Office Building and other commercial/retail buildings.

Source: CAJA Environmental Services, LLC, June 2013.



View 13: View north at intersection of 4th Street and Broadway toward commercial/retail uses.



View 14: View northwest across Broadway toward Junipero Serra Office Building.



View 15: View southwest across Broadway toward commercial/retail buildings.



View 16: View south along Broadway toward commercial/retail, office, and residential uses.

Source: CAJA Environmental Services, LLC, June 2013.



View 17: View east across Broadway toward upper floors on the adjacent Judson apartment building.



View 18: View east across Broadway toward lower floors on the adjacent Judson apartment building and retail uses.



View 19: View southeast across Broadway commercial/retail, office, and residential uses.



View 20: View southwest across Broadway toward Junipero Serra Office Building.

Source: CAJA Environmental Services, LLC, June 2013.



View 21: View west on 4th Street toward Bunker Hill. The Project Site is on the lower left.



View 22: View south of the façade of the Title Insurance Building on Spring Street.



View 23: View east of the residential buildings on Spring Street in the Old Bank District.



View 24: View southwest on 4th Street and Spring Street toward the Financial Core skyscraper of Downtown.

Source: CAJA Environmental Services, LLC, June 2013.

Proposed Project

The Project would construct a new residential and retail mixed use development.

The Project would include 450 residential units and 6,904 square feet of ground floor retail.

Building Program

Residential

The 450 residential units will include:³

- 69 studio units,
- 224 1-bedroom units,
- 35 1-bedroom + Den units, and
- 121 2-bedroom units
- 1 Penthouse 3-bedroom unit

Commercial

There will be 6,904 square feet of commercial space on the ground floor.

Height

The building will have 34 levels above ground (and 2 levels below ground) and a total height of 388'-0".

- The ground floor (retail and parking) would be 20'-0" in height
- The 2nd through 4th floors (parking) would be 9'-6" each
- The 5th through 6th floors (residential and parking) would be 10'-8" each
- The 7th through 33rd floors (residential), except level 10, would be 10'-8" each.
- The 10th floor would be 11'-0".
- The 34th floor (Penthouse) would be 18'-8"

³ HansonLA, Architects, Entitlement Submittal, January 10, 2014.

There is no maximum height limit, per Height District 4 for C zone, however the Broadway CDO and Ordinance 180,871 has a 100 foot height minimum, and a requirement that buildings be stepped back 30 feet above 150 feet.

Building Floor Area

The Project proposes a total floor area of approximately 444,099 square feet. The Project Site area (prior to requested vacation) is 34,253 square feet, which would permit a base floor area of 205,518 square feet at a floor area ratio of 6:1. If the applicant’s vacation request is approved, the Project Site area would increase to 37,529, which would permit a base floor area of 225,174 square feet. The maximum floor area that can be achieved with a Transfer of Floor Area Rights (TFAR) is 13:1. This would result in a maximum floor area of 445,289 square feet, prior to vacation, and 487,877 square feet, post-vacation. The applicant is requesting a maximum transfer of 238,581 square feet of floor area rights for a total floor area of 444,099 square feet. The floor area rights would be transferred from the Los Angeles Convention Center to the Project Site.

The Project’s building uses by floor area is shown in Table 2-2, Floor Areas.

The usable area is 369,523 square feet, the lobby/hall area is 49,341 square feet, and the communal area is 25,235 square feet.

**Table 2-2
Floor Areas**

Floor Level	Number of Floors	Usable Area	Lobby / Hallway	Communal Space	Subtotal / Floor	Total
Basement 1-2	2	0	0	0	0	0
Ground Floor	1	6,781	2,720	3,902	13,403	13,403
Floors 2-4	3	0	0	0	0	0
Floors 5-6	2	8,494	1,433	0	9,927	19,854
Floors 7-8	2	16,173	4,287	6,256	26,716	53,432
Floor 9	1	16,173	4,287	6,256	26,716	26,716
Floor 10	1	16,173	4,287	0	20,460	20,460
Floor 11	1	8,701	1,108	2,565	12,374	12,374
Floors 12-33	22	12,170	1,108	0	13,278	292,116
Floor 34	1	4,621	1,123	0	5,744	5,744
Total	36					444,099

Source: HansonLA, architects, Entitlement Request, January 10, 2014.

Table: CAJA Environmental Services, January 2014.

Setbacks

There would be a 0’-0” setback against the alley, a 0’-0” setback against the adjacent residential building (The Judson), and a 0’-0” setback along Broadway. There would be a 0’-0” setback along 4th Street.⁴

Access

Access to the on-site parking garage will be provided via three driveways:

- South side of 4th Street, east of Broadway, in the vicinity of the existing driveway on 4th Street
- Two access points on Frank Court (the alley that bounds the Project Site to the east)

No vehicle access would be provided on Broadway.

Parking

Parking for the Project will be provided within an on-site, 8-level parking structure (2 basement levels + 1 ground level + 5 above ground levels) containing a total of 450 parking spaces, which is 35 spaces in excess of code requirements. Parking is shown in Table 2-3, Project Parking.

**Table 2-3
Project Parking**

Type	Quantity	Rate	Total
Parking Required			
Studio and 1-bedroom	293 units	1 / unit	293
1-bedroom + den and 2-bedroom	156 units	1.25 / unit	195
Penthouse – 3 bedroom	1 unit	1.25 / unit	2
Retail/Commercial	6,904 sf	<7,500 sf	0
Subtotal Required Spaces			490
<i>Less 15% Reduction of required parking (<1,500 feet from transit station)</i>			<i>-73</i>
Total Required Spaces			415
Accessible Parking Required			
Required 2% of units			9
Van Accessible (1 in 8 Accessible)			2
Parking Provided			

⁴ HansonLA, Architects, Entitlement Request, January 10, 2014.

Code Compliant Spaces	353
Type A Spaces (8'4" x <18')	88
Accessible Parking Spaces	7
Van Accessible Spaces	2
Total Provided	450
<i>Source: HansonLA, Architects, Entitlement Request, January 10, 2014.</i>	
<i>Table: CAJA Environmental Services, January 2014.</i>	

Bicycles

There would be 572 bicycle spaces, which is 69 more than required. There would be 197 spaces on the ground floor, 86 spaces on floor 5, 86 spaces on floor 6, and 203 spaces on floor 10. Bicycle parking is shown in Table 2-4, Bicycle Parking.

**Table 2-4
Bicycle Parking**

Type	Quantity	Rate	Total
Bicycle Parking Required			
Long Term 1 per Dwelling Unit			450
Short Term 1 per 10 Dwelling Units			45
Long Term 1 per 2,000 sf commercial			4
Short Term 1 per 1,000 sf commercial			4
		Total Required	503
Bicycle Parking Provided			
Long Term Parking at ground level			148
Short Term Parking at ground level			49
Long Term at upper levels			306
Additional long term at upper levels			69
		Total Provided	572
<i>Source: HansonLA, Architects, Entitlement Submittal, January 10, 2014.</i>			
<i>Table: CAJA Environmental Services, January 2014.</i>			

5.8 Amenities and Open Space

The Project will include an Amenities Deck (Floor 11) containing a swimming pool, sauna/steam room and fitness room.

The Project's open space requirement and amount provided are shown in Table 2-5, Project Open Space. The Project would be deficient of the open space requirement by 2,088 square feet.

**Table 2-5
Project Open Space**

Unit Type	Amount	Requirement	Total (sf)
Open Space Required			
Studio and 1-bedroom	293 units	100 sf / unit	29,300
1-bedroom + Den and 2-bedroom	156 units	125 sf / unit	19,500
Penthouse	1 unit	175 sf / unit	175
Total Required			48,975
Open Space Provided			
Total Terrace Area			21,630
Total Communal Area			7,907
Total Balcony Area			17,350
Total Provided			46,887
<i>Source: HansonLA, Architects, Entitlement Submittal, January 10, 2014. Table: CAJA Environmental Services, January 2014.</i>			

Green/Conservation Features

The Project will comply with CalGreen requirements of the California Building Code. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.

Construction Schedule

Construction is anticipated to begin in 3rd Quarter 2014 with operation in late 2017.

- Demolition of the existing building will take a maximum of 2 weeks.
- Excavation and shoring will take approximately 3 months.
- Construction will take approximately 36 months.

The excavation will be approximately 20 feet deep and approximately 750,000 cubic feet (or 27,777 cubic yards of export).⁵

Construction Haul Route

A Haul Route program would be required as part of the City's permitting process. It is anticipated that the limited demolition and construction debris will be transported to the Sunshine Canyon Landfill in Sylmar. The haul routes to and from the Project Site would generally include:

- Broadway to US-101 freeway to CA-170 freeway to I-5 freeway to Sepulveda Blvd to San Fernando Road to Sunshine Canyon Landfill.

Building Plans, Sections, and Elevations

- Figure 2-16 is the Site Plan.
- Figures 2-17 through 2-29 contains the floor plans for the building.
- Figures 2-30 and 2-31 provide sections to the building.
- Figures 2-32 through 2-35 provide north, west, east, and south elevations, respectively.⁶
- Figures 2-36 through 2-38, provide details of the building design system.
- Figures 2-39 and 2-40 provide the landscape plans for the 7th and 11th floors, respectively.-

Discretionary Actions

The Project would request approval of the following discretionary actions:

1) Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5, the Applicant requests a Transfer of Floor Area Rights (TFAR) from the Los Angeles Convention Center (Donor Site) to the Project Site

⁵ 20 feet x 37,500 sf approximate site area = 750,000 cubic feet / 27 cubic yards/cubic feet = 27,777 cubic yards.

⁶ The proposed building cornices and balconies as presented in these elevations have been revised to respond to March 24 City Staff design comments regarding the overall contemporary aesthetic presented at the cornices, in particular at the top of the building, and regarding the general presence and existence of balconies in the vicinity of the surrounding historic district. The cornices have been redesigned to be more compatible in appearance and features of the surrounding historic-era buildings. See Figure 4.5-2, Rendering, for the revised cornice appearance, and the discussion in Section 5.a), Cultural Resources, of this IS/MND.

(Receiver Site). The Applicant is requesting a maximum transfer of approximately 238,581 square feet of floor area to the Receiver Site.

2) Pursuant to LAMC Section 17.01, the Applicant requests approval of a Tentative Tract map (Tract No. TT-72418-CN), to permit the creation of 450 apartment/condominium units, one (1) commercial condominium, and one (1) parking condominium unit.

3) Pursuant to LAMC Section 12.32, the Applicant requests a Zone Change to amend [Q] Qualified Condition Number 11 of Ordinance 180,871 to permit a reduced floor to ceiling height of 10 feet, in lieu of 15 feet, for 6,525 square feet of the ground floor.

4) Pursuant to LAMC Section 13.08, the Applicant requests a Design Overlay Plan Approval within the Broadway Theater and Entertainment District Community Design Overlay (CDO, Ordinance 180,871).

5) Pursuant to LAMC Section 12.27, the Applicant requests a Variance from LAMC Section 12.21-A, 5(a)(1) to reduce the parking-stall-width for 88 residential Standard parking spaces from the code-required 8'-6" to 8'-4".

6) Pursuant to LAMC Section 12.27, the Applicant requests a Variance from LAMC Section 12.21-A, 5(b), to reduce the drive-aisle-width for the Ground Floor, floors B1, B2, 2, 3, 4, 5, and 6 from the code-required 28'-0" to 26'-8".

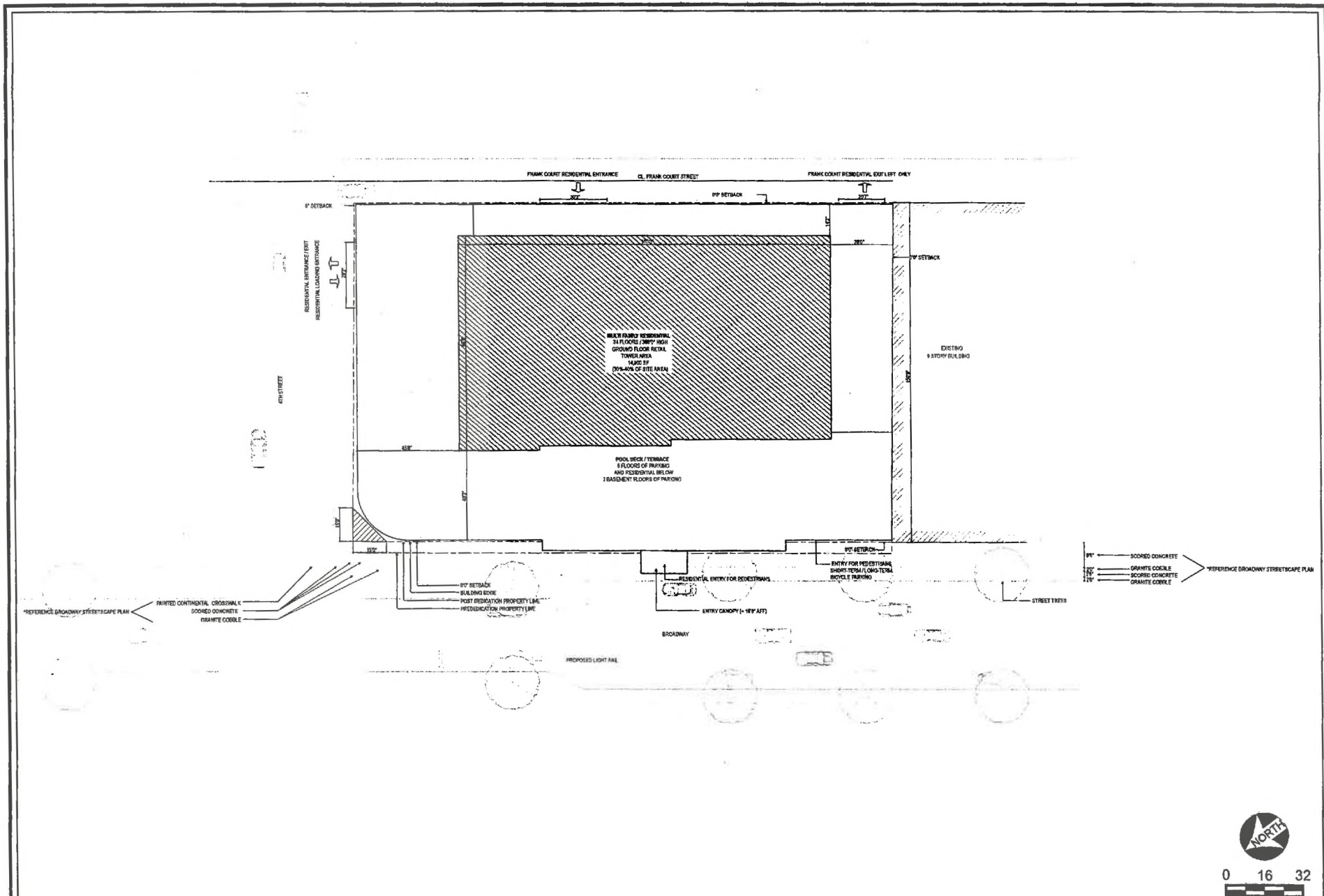
7) Pursuant to LAMC Section 12.27, the Applicant requests a Variance from LAMC Section 12.21 G.2(3) to reduce the number of required on-site trees from 113 to 84, with the remaining 29 trees to be planted off-site.

8) Pursuant to LAMC Section 12.27, the Applicant requests a Variance from LAMC Section 17.15 C to permit construction to commence for the building in conjunction with an approval of Tentative Tract No. 72418, prior (Early Start) to recordation of a Final Tract Map.

9) Pursuant to LAMC Section 12.21 G.3, the Applicant requests a Director's Decision to allow a 4.3% reduction from the Open Space required in LAMC Section 12.21 G for a total open space of 46,887 square feet in lieu of the required 48,975 square feet.

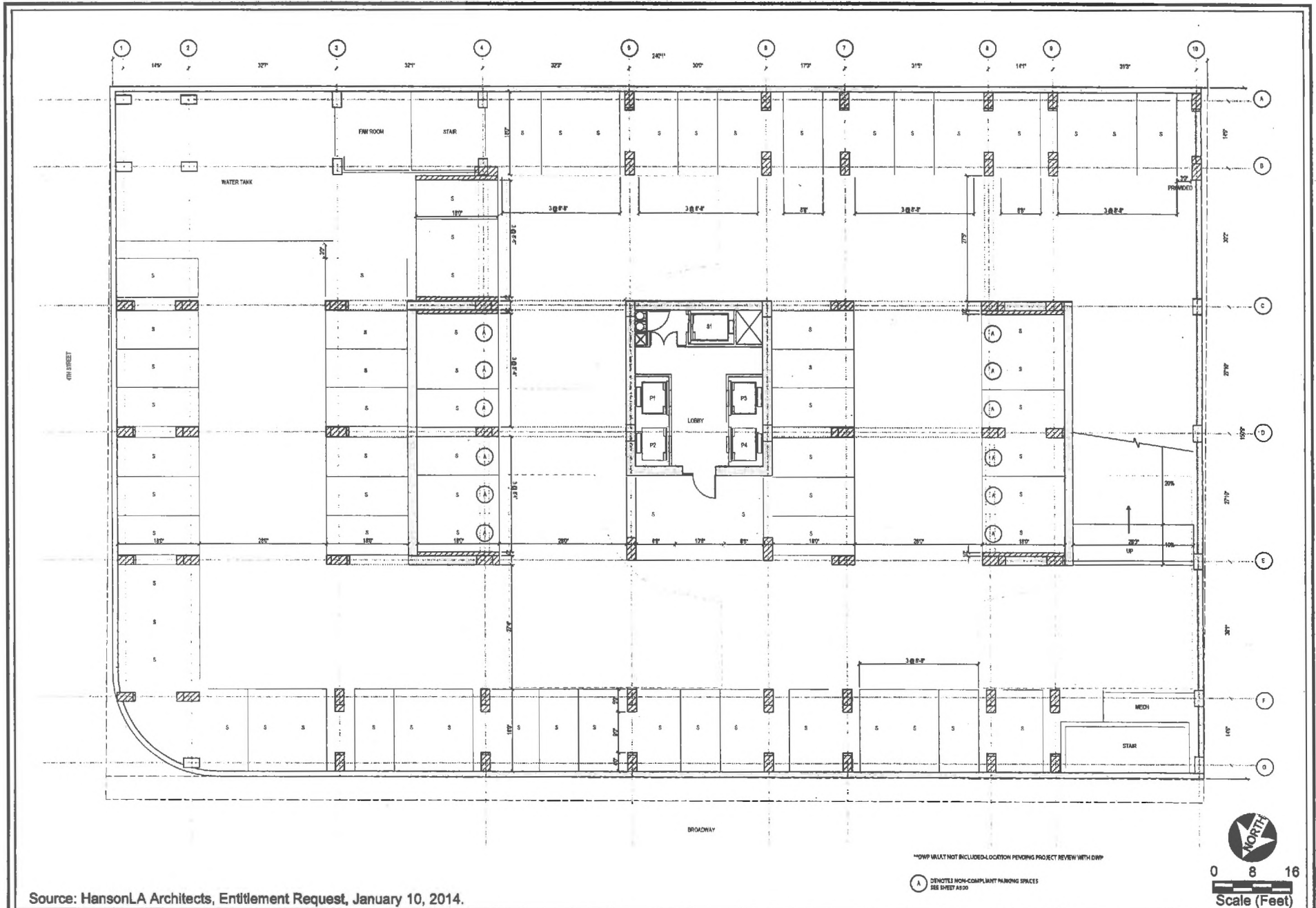
10) Pursuant to LAMC Section 16.05, the Applicant requests that Site Plan Review findings be made as part of the discretionary approvals.

11) Pursuant to LAMC Section 17.13, the Applicant requests approval of a Haul Route Permit for export of up to 30,000 cubic yards of dirt.



Source: HansonLA Architects, Entitlement Request, January 10, 2014.

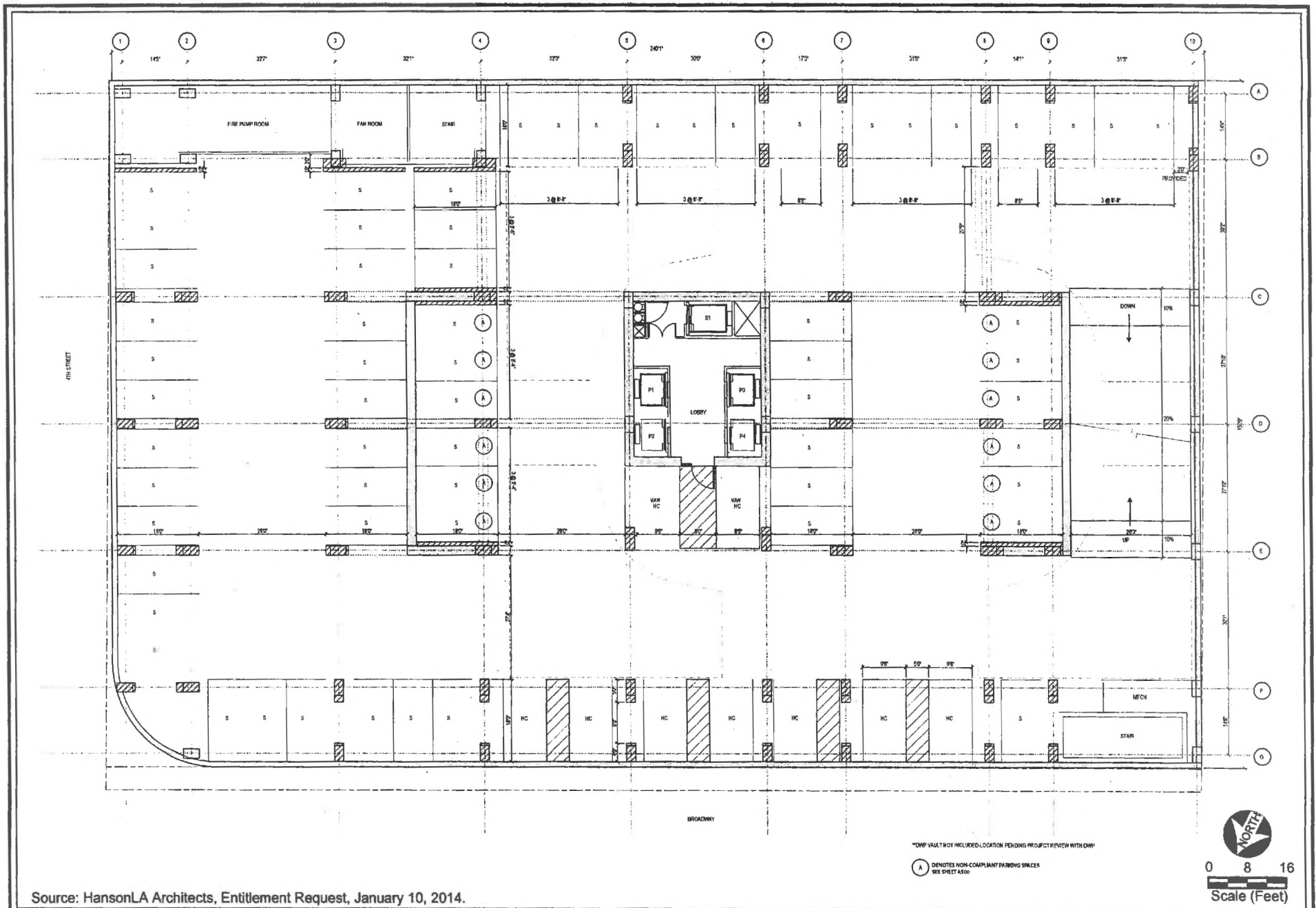
Figure 2-16
 Site Plan

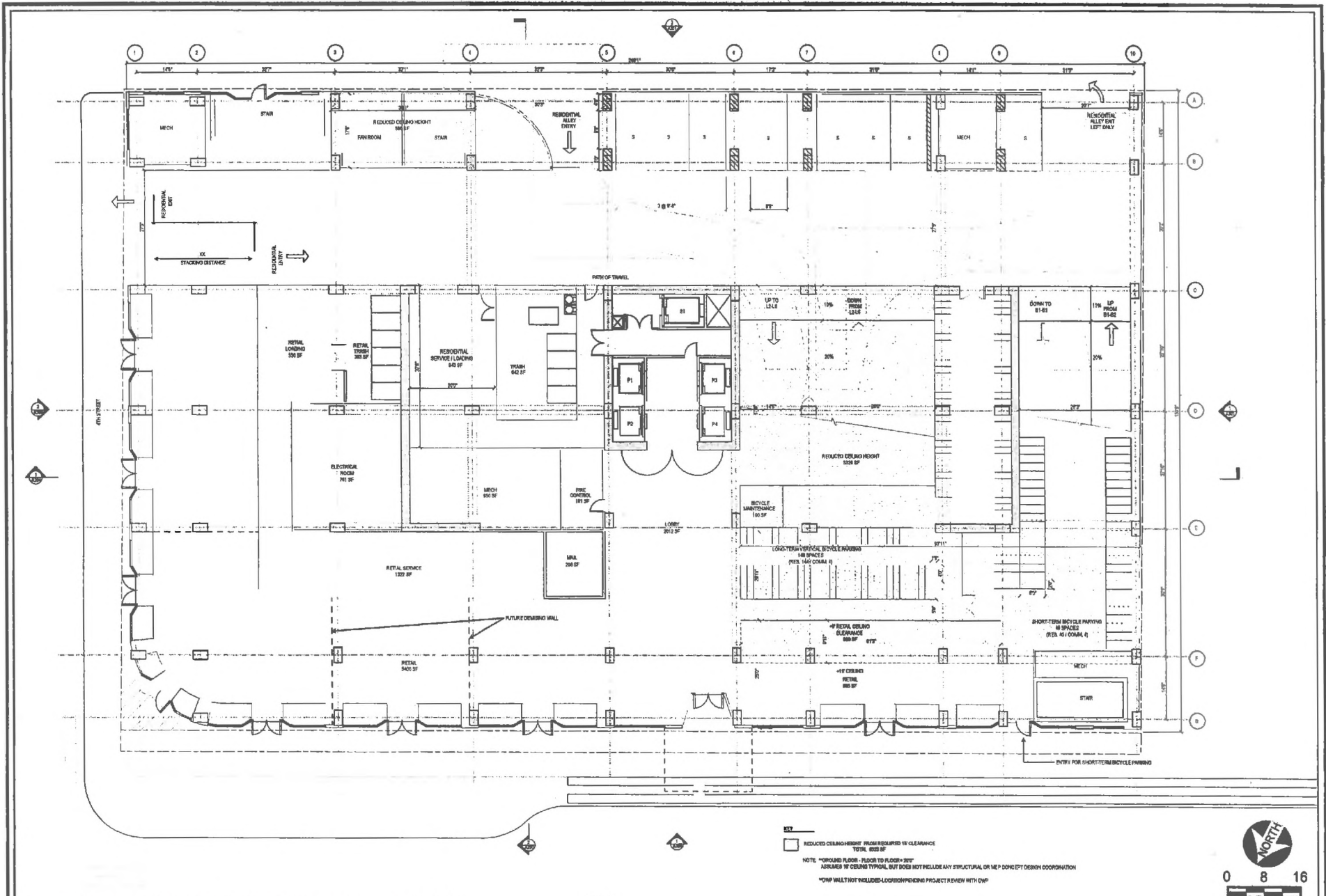


Source: HansonLA Architects, Entitlement Request, January 10, 2014.



Figure 2-17
Floor Plan - Level B2

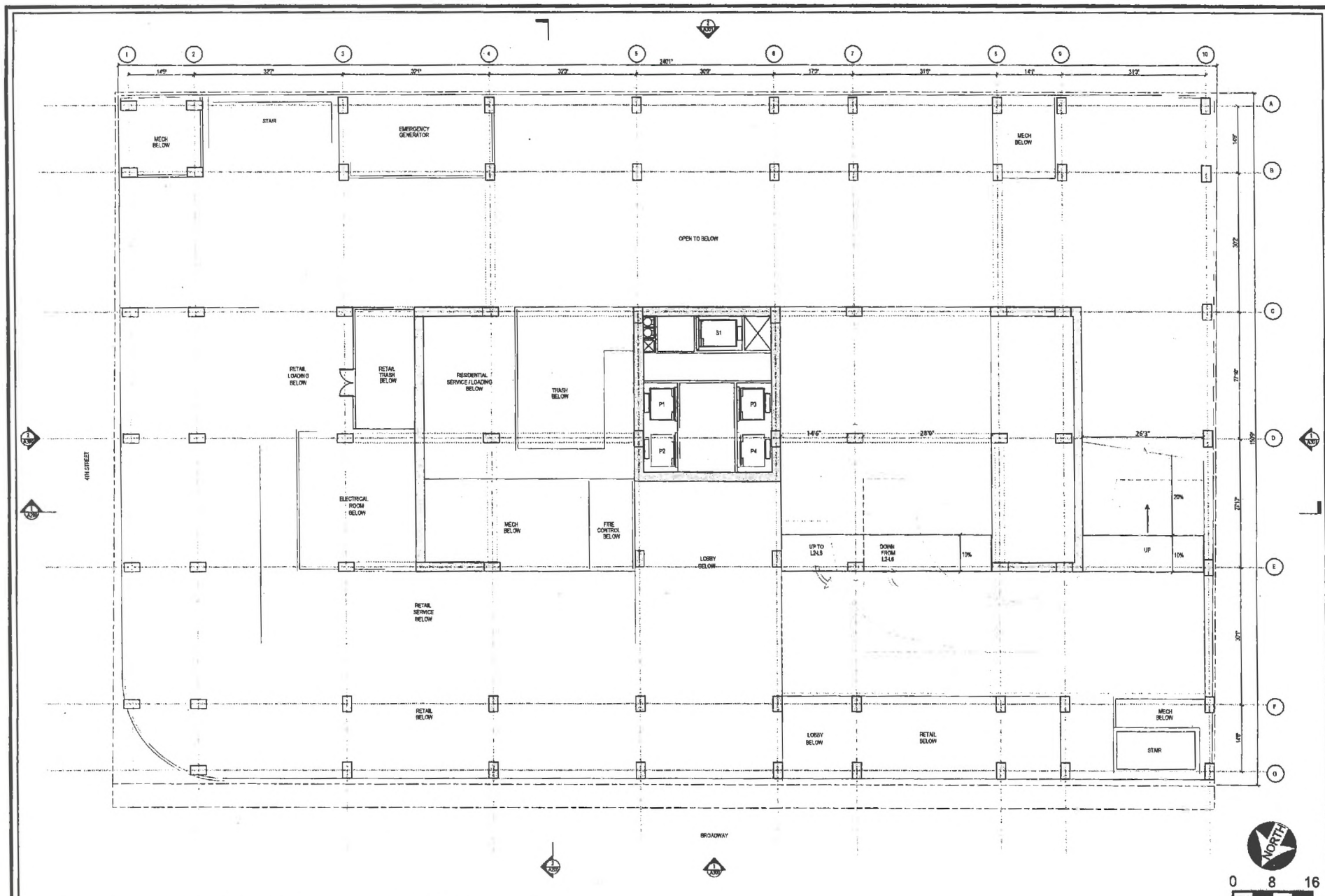




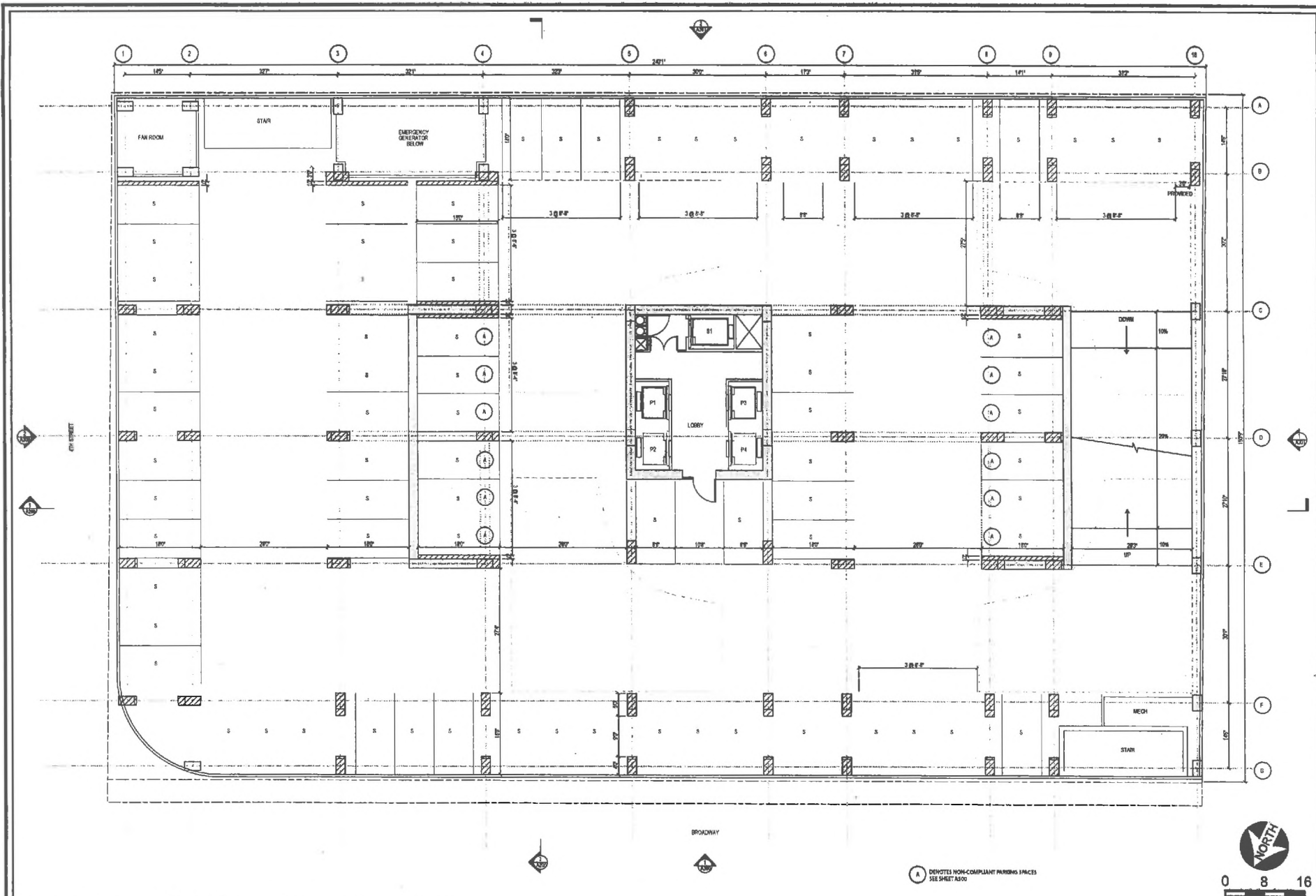
Source: HansonLA Architects, Entitlement Request, January 10, 2014.



Figure 2-19
Floor Plan - Level 1



Source: HansonLA Architects, Entitlement Request, January 10, 2014.



Source: HansonLA Architects, Entitlement Request, January 10, 2014.

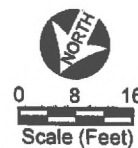
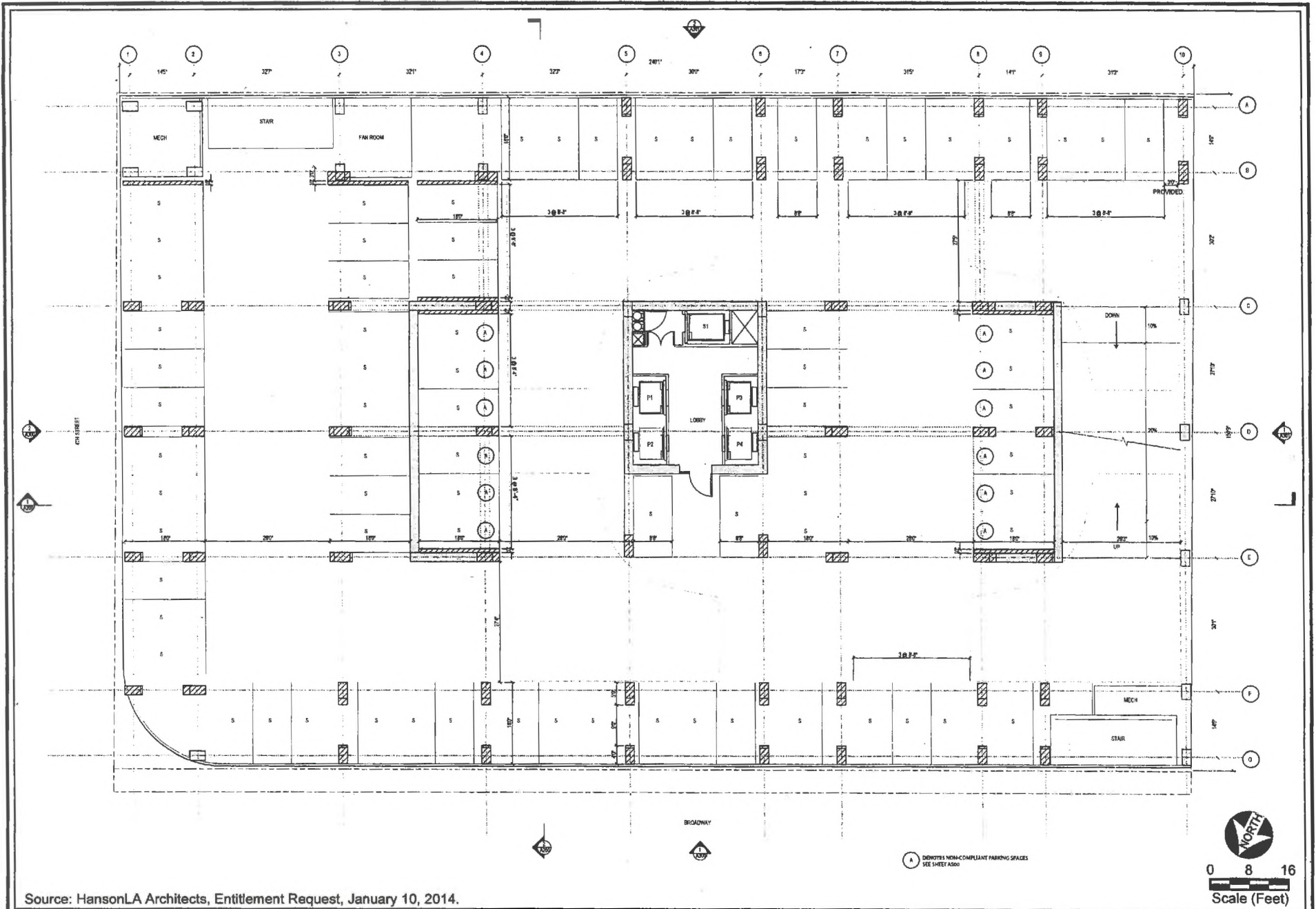
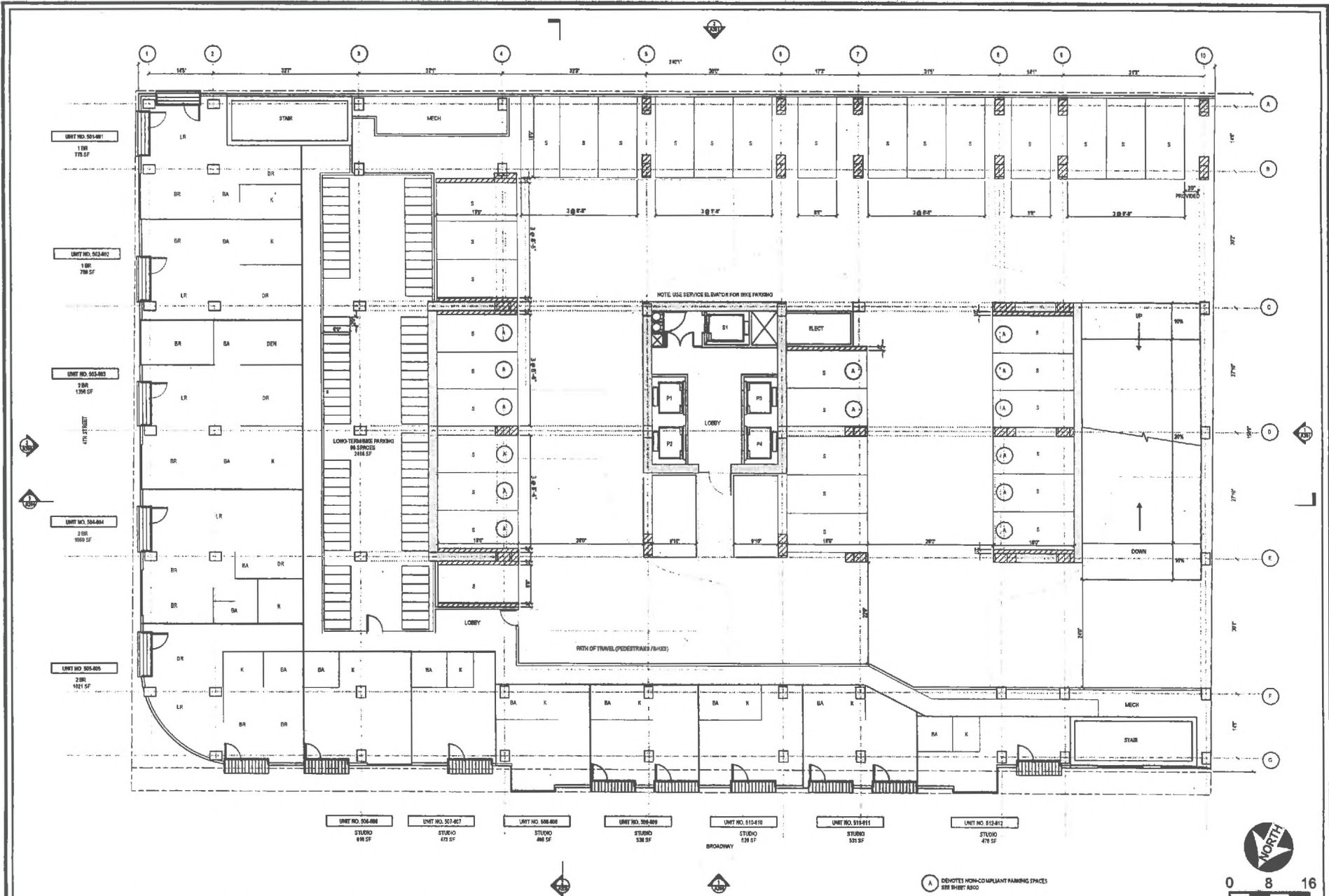


Figure 2-21
Floor Plan - Level 2



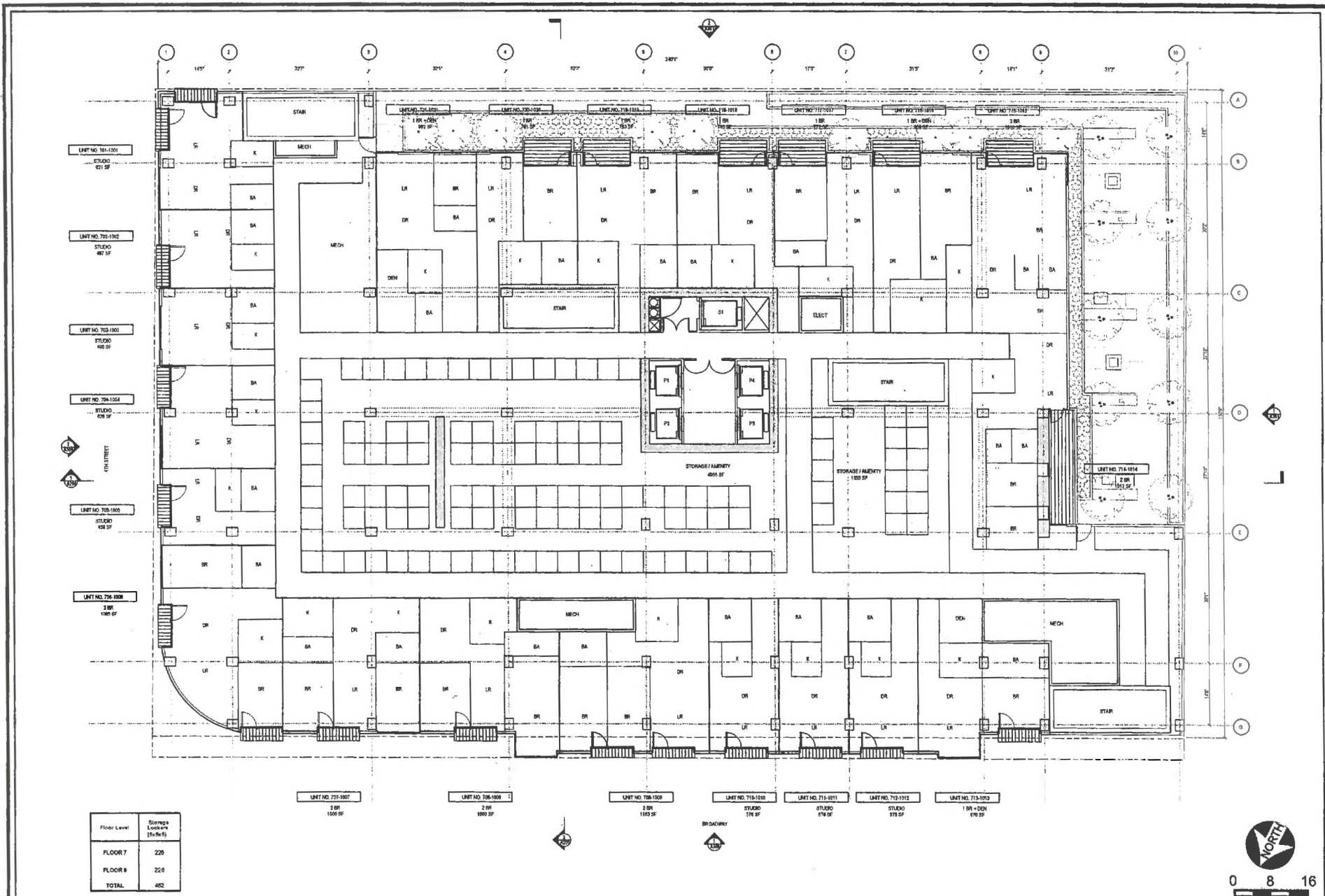
Source: HansonLA Architects, Entitlement Request, January 10, 2014.



Source: HansonLA Architects, Entitlement Request, January 10, 2014.



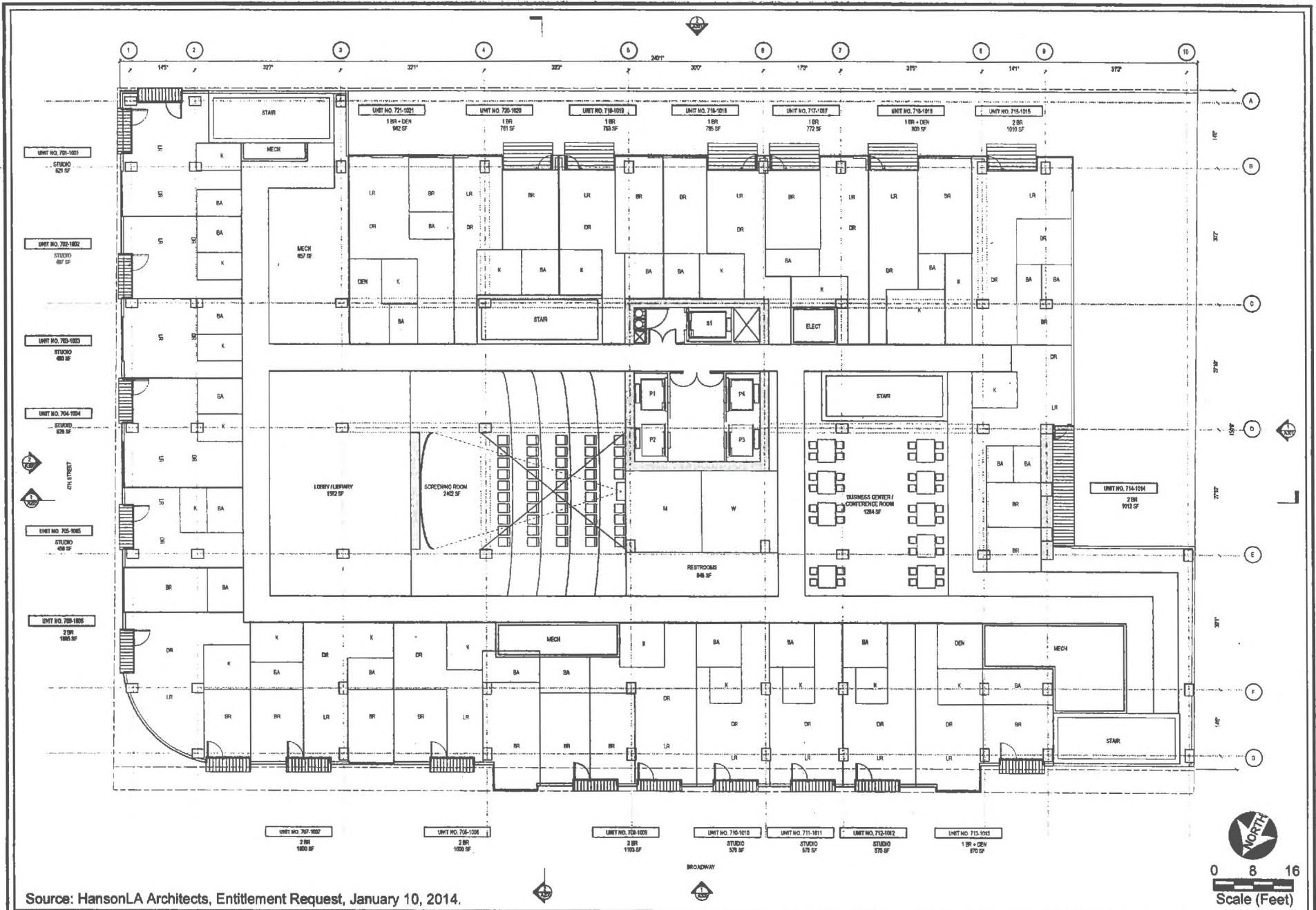
Figure 2-23
Floor Plan - Level 5-6

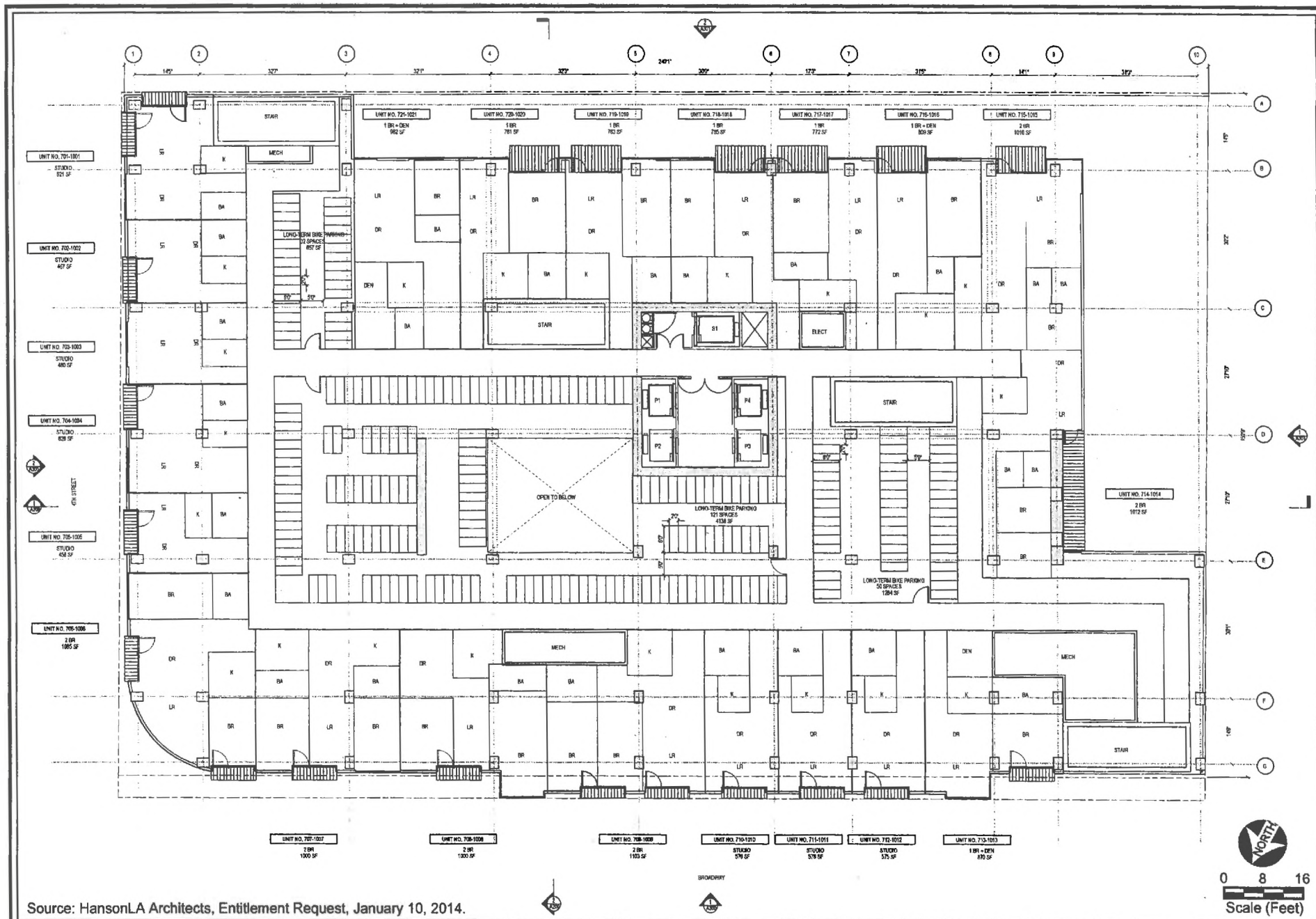


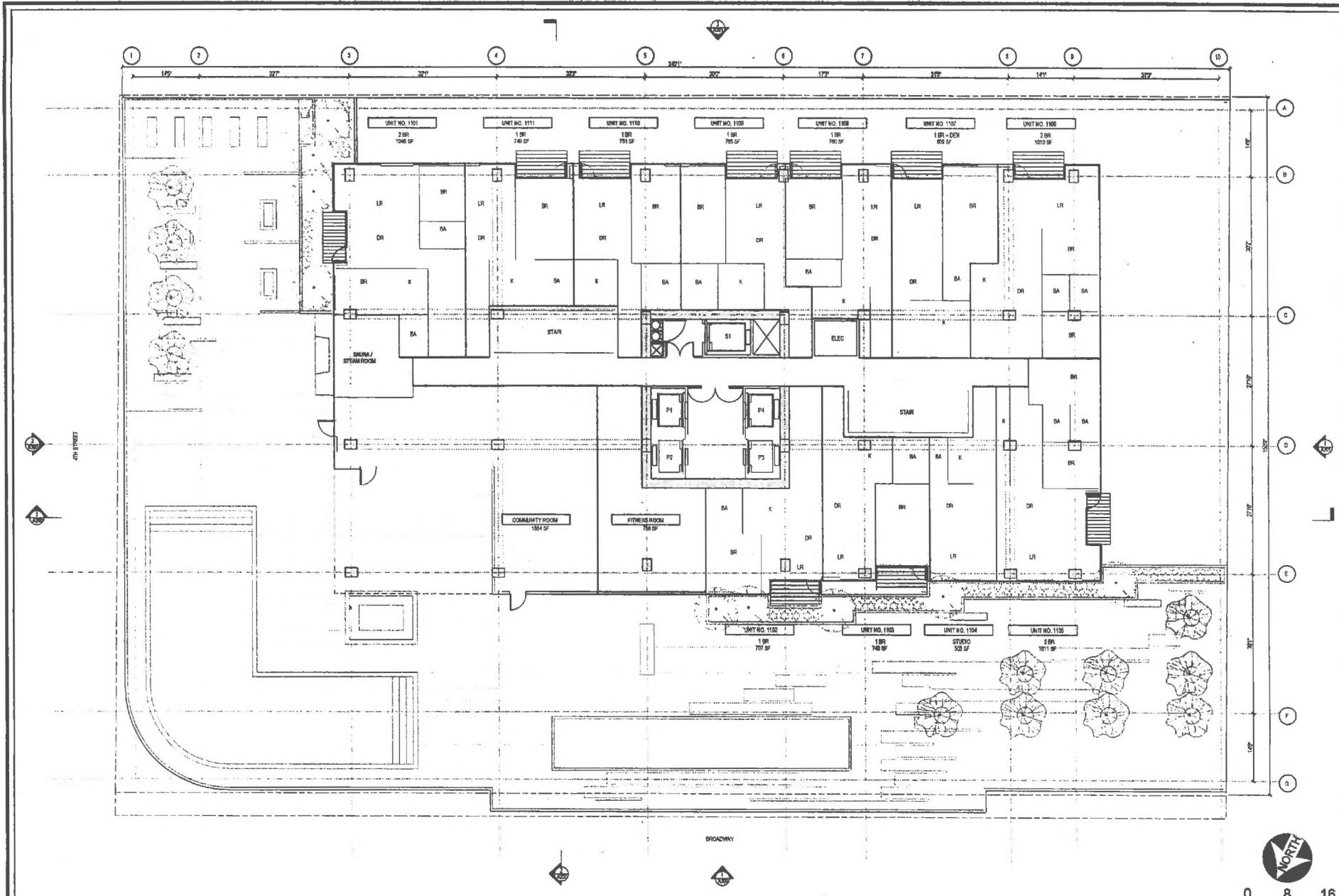
Floor Level	Storage Lockers (Sq.Ft.)
FLOOR 7	220
FLOOR 8	226
TOTAL	446

Source: HansonLA Architects, Entitlement Request, January 10, 2014.

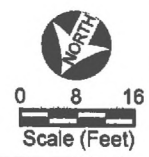
Figure 2-24
Floor Plan - Level 7-8

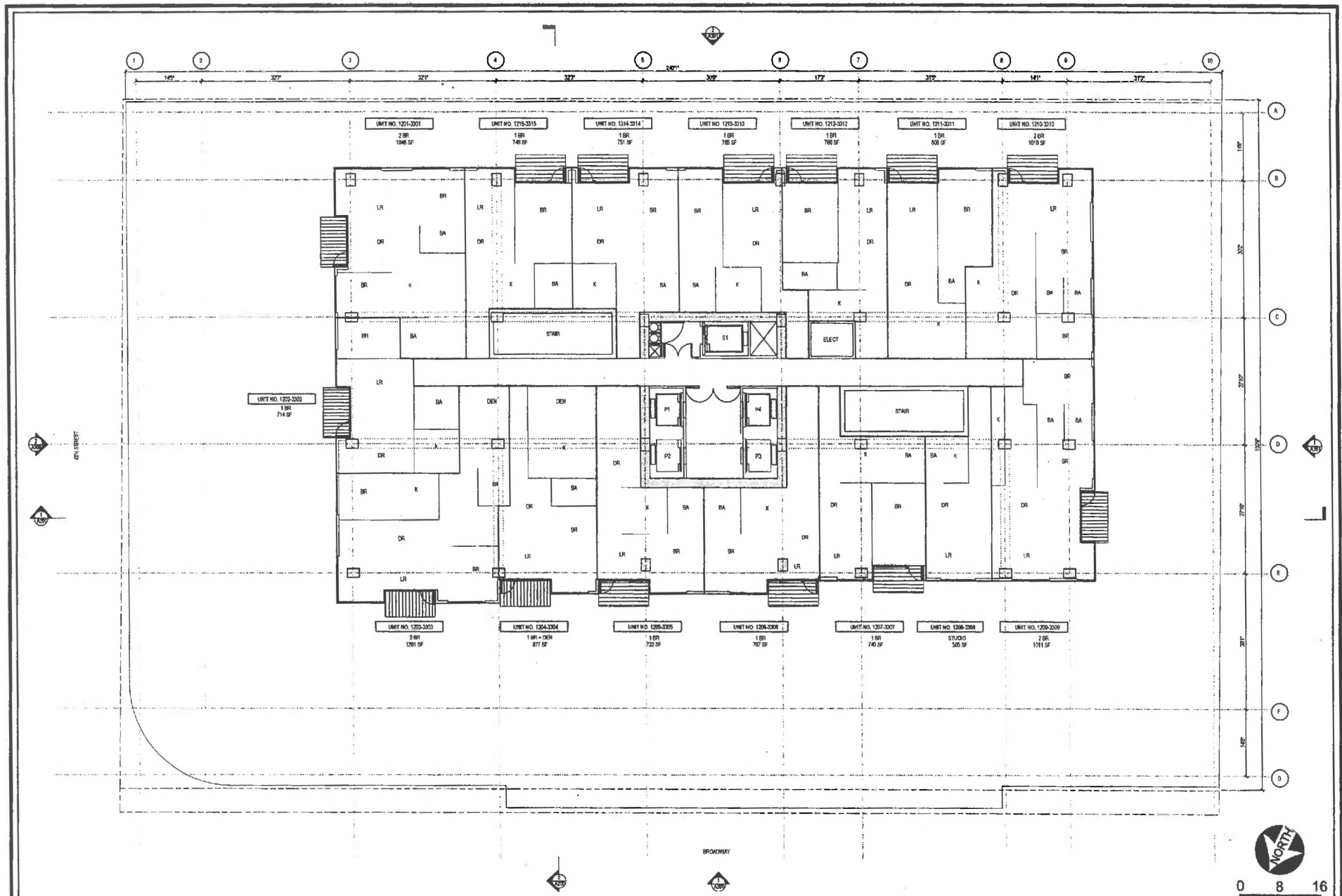




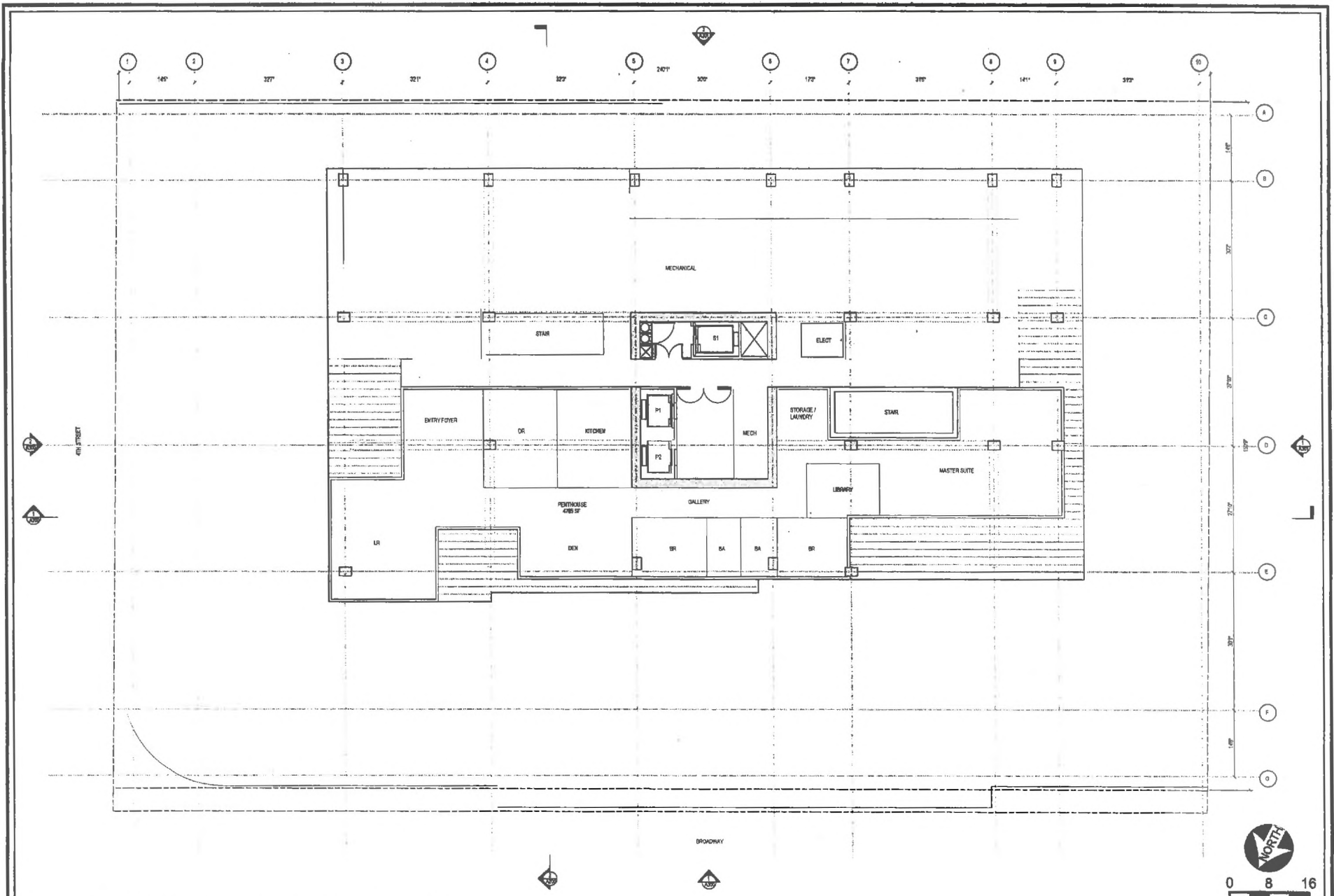


Source: HansonLA Architects, Entitlement Request, January 10, 2014.

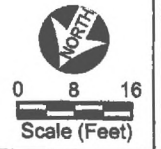


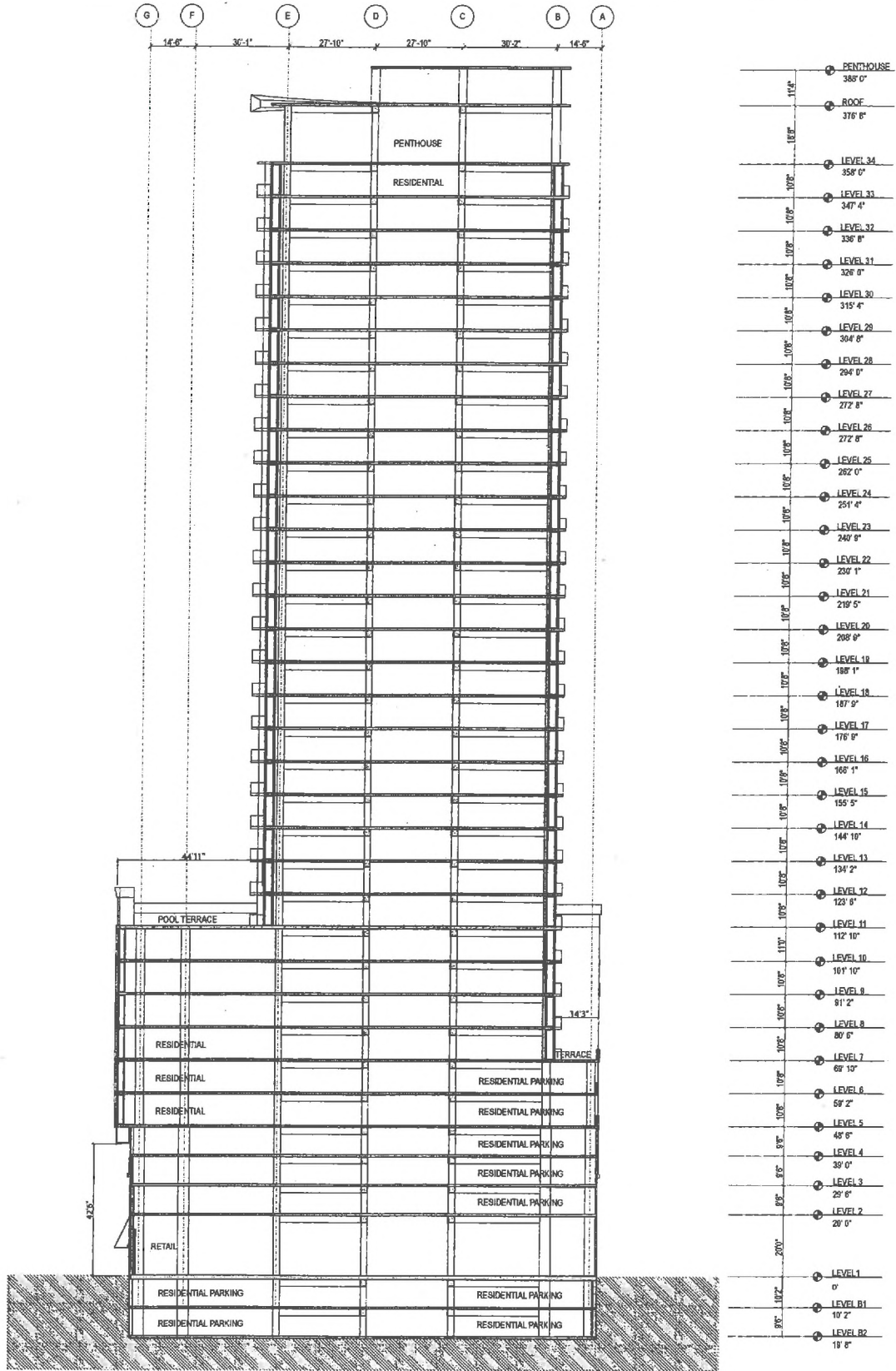


Source: HansonLA Architects, Entitlement Request, January 10, 2014.



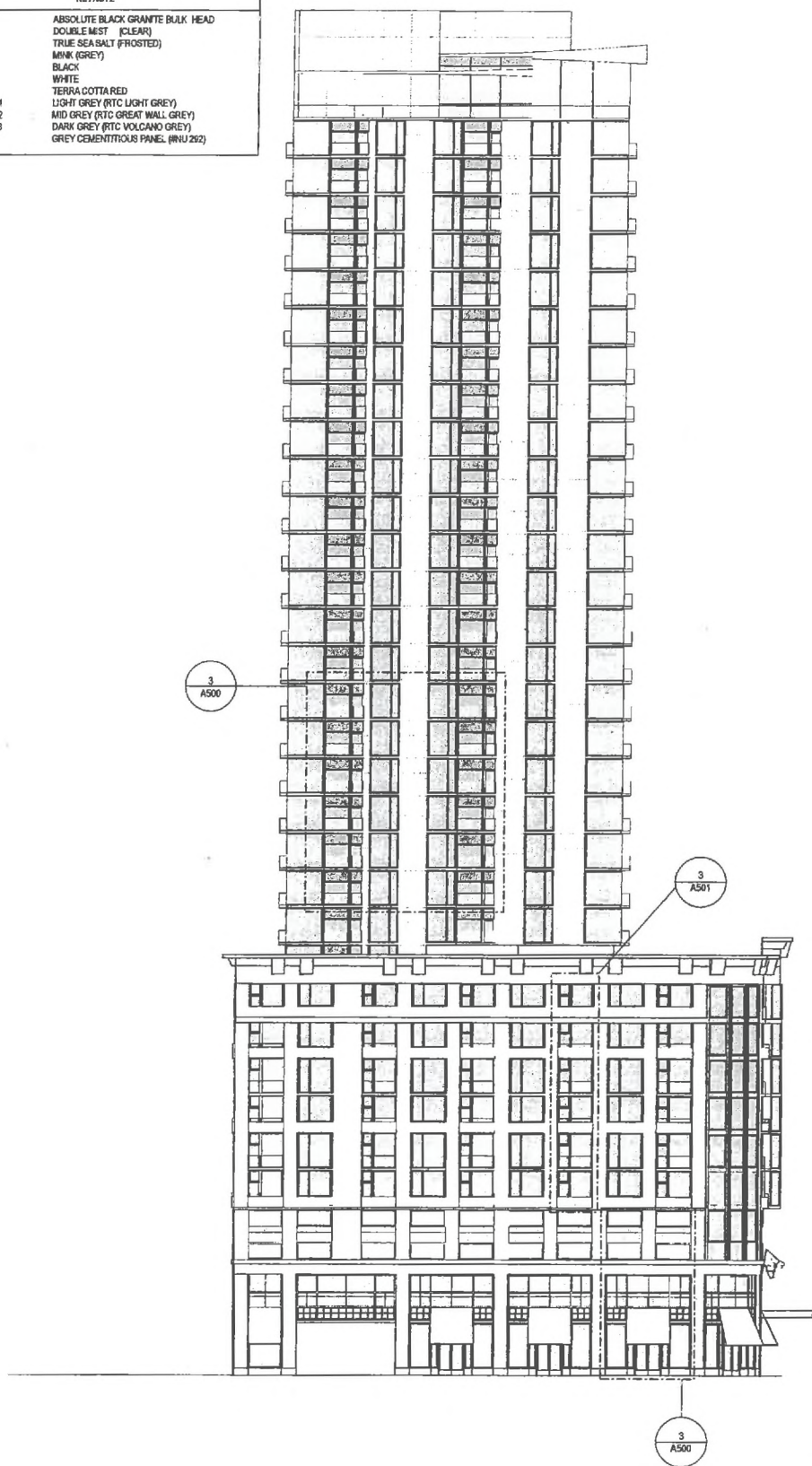
Source: HansonLA Architects, Entitlement Request, January 10, 2014.





Source: HansonLA Architects, Entitlement Request, January 10, 2014.

KEY VALUE	KEYNOTE
ST-1	ABSOLUTE BLACK GRANITE BULK HEAD
GL-1	DOUBLEMIST (CLEAR)
GL-2	TRUE SEASALT (FROSTED)
GL-3	MINI (GREY)
PTD-1	BLACK
PTD-2	WHITE
PTD-3	TERRA COTTARED
TERRA COTTA COL-1	LIGHT GREY (RTC LIGHT GREY)
TERRA COTTA COL-2	MID GREY (RTC GREAT WALL GREY)
TERRA COTTA COL-3	DARK GREY (RTC VOLCANO GREY)
FCP 1	GREY CEMENTITIOUS PANEL (RNU 262)



PENTHOUSE	338' 0"
ROOF	376' 6"
LEVEL 34	358' 0"
LEVEL 33	347' 4"
LEVEL 32	336' 8"
LEVEL 31	326' 0"
LEVEL 30	315' 4"
LEVEL 29	304' 8"
LEVEL 28	294' 0"
LEVEL 27	272' 8"
LEVEL 26	272' 8"
LEVEL 25	262' 0"
LEVEL 24	251' 4"
LEVEL 23	240' 8"
LEVEL 22	230' 1"
LEVEL 21	219' 5"
LEVEL 20	208' 9"
LEVEL 19	198' 1"
LEVEL 18	187' 5"
LEVEL 17	176' 9"
LEVEL 16	166' 1"
LEVEL 15	155' 5"
LEVEL 14	144' 10"
LEVEL 13	134' 2"
LEVEL 12	123' 6"
LEVEL 11	112' 10"
LEVEL 10	101' 10"
LEVEL 9	91' 2"
LEVEL 8	80' 6"
LEVEL 7	69' 10"
LEVEL 6	59' 2"
LEVEL 5	48' 6"
LEVEL 4	38' 0"
LEVEL 3	29' 6"
LEVEL 2	20' 0"
LEVEL 1	0'
LEVEL B1	10' 2"
LEVEL B2	19' 8"

Source: HansonLA Architects, Entitlement Request, January 10, 2014.

METAL FASCIA PTD
TO MATCH FCP-1

KEY VALUE	KEYNOTE
ST-1	ABSOLUTE BLACK GRANITE BULK HEAD
GL-1	DOUBLE MIST (CLEAR)
GL-2	TRUE SEA SALT (FROSTED)
GL-3	MINK (GREY)
PTD-1	BLACK
PTD-2	WHITE
PTD-3	TERRA COTTA RED
TERRA COTTA COL-1	LIGHT GREY (R1C LIGHT GREY)
TERRA COTTA COL-2	MID GREY (R1C GREAT WALL GREY)
TERRA COTTA COL-3	DARK GREY (R1C VOLCANO GREY)
FCP 1	GREY CEMENTITIOUS PANEL (WNU 282)

FCP 1

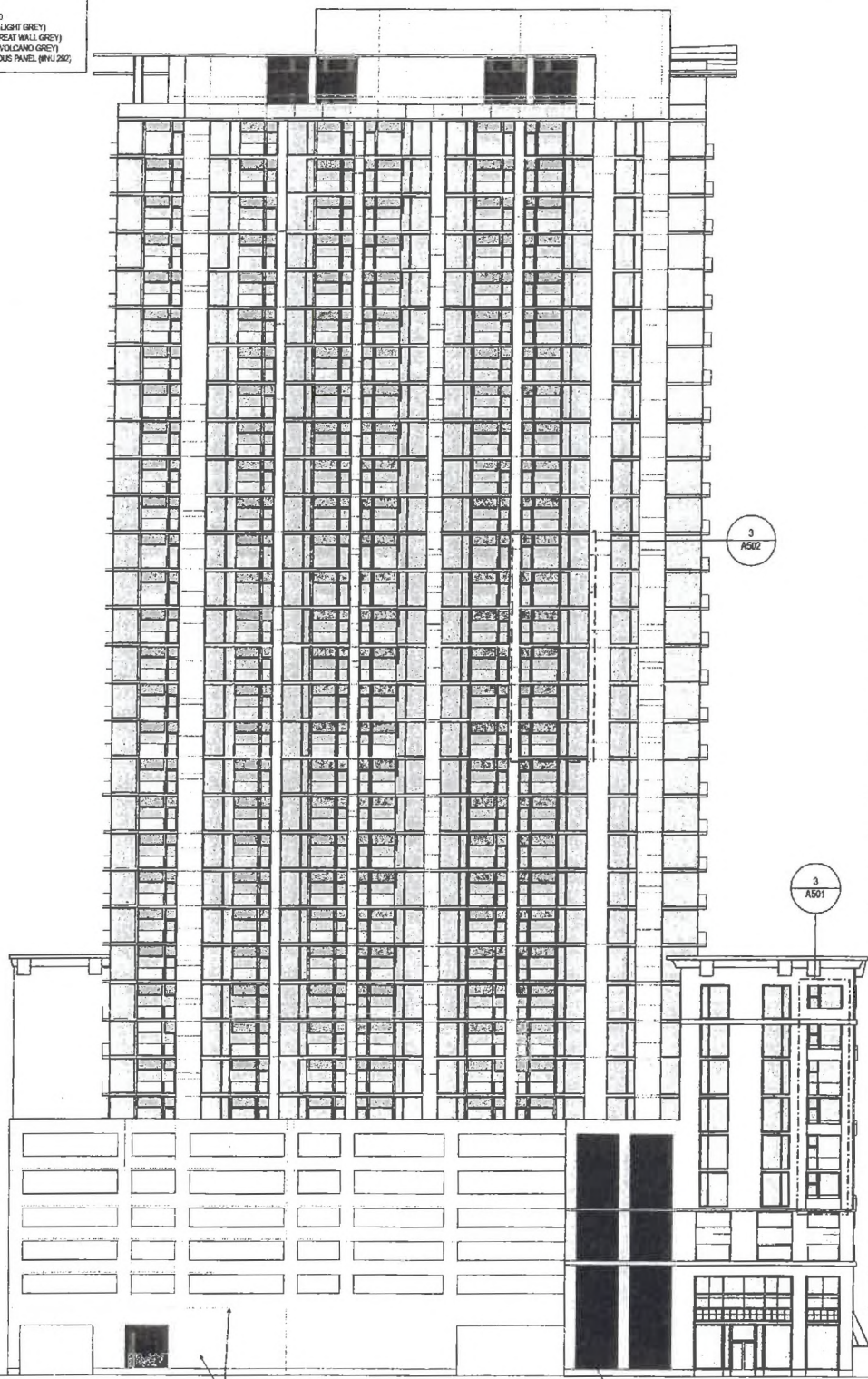
METAL CORNICE PTD-1



- PENTHOUSE 388' 0"
- ROOF 376' 8"
- LEVEL 34 368' 0"
- LEVEL 33 347' 4"
- LEVEL 32 336' 8"
- LEVEL 31 326' 0"
- LEVEL 30 315' 4"
- LEVEL 29 304' 8"
- LEVEL 28 294' 0"
- LEVEL 27 272' 8"
- LEVEL 26 272' 8"
- LEVEL 25 262' 0"
- LEVEL 24 251' 4"
- LEVEL 23 240' 8"
- LEVEL 22 230' 1"
- LEVEL 21 219' 5"
- LEVEL 20 208' 9"
- LEVEL 19 198' 1"
- LEVEL 18 187' 5"
- LEVEL 17 176' 9"
- LEVEL 16 166' 1"
- LEVEL 15 155' 5"
- LEVEL 14 144' 10"
- LEVEL 13 134' 2"
- LEVEL 12 123' 6"
- LEVEL 11 112' 10"
- LEVEL 10 101' 10"
- LEVEL 9 91' 2"
- LEVEL 8 80' 6"
- LEVEL 7 69' 10"
- LEVEL 6 59' 2"
- LEVEL 5 48' 6"
- LEVEL 4 38' 0"
- LEVEL 3 27' 4"
- LEVEL 2 20' 0"
- LEVEL 1 0"
- LEVEL B1 10' 2"
- LEVEL B2 19' 8"

Source: HansonLA Architects, Entitlement Request, January 10, 2014.

KEY VALUE	KEYNOTE
ST-1	ABSOLUTE BLACK GRANITE BULK HEAD
GL-1	DOUBLE MIST (CLEAR)
GL-2	TRUE SEA SALT (FROSTED)
GL-3	MINK GREY
PTD-1	BLACK
PTD-2	WHITE
PTD-3	TERRA COTTA RED
TERRA COTTA COL-1	LIGHT GREY (PTC LIGHT GREY)
TERRA COTTA COL-2	MID GREY (PTC GREAT WALL GREY)
TERRA COTTA COL-3	DARK GREY (PTC VOLCANO GREY)
FP	GREY CEMENTITIOUS PANEL (HW 252)



- HELIPAD
387' 11"
- ROOF
378' 8"
- LEVEL 34
358' 0"
- LEVEL 33
347' 4"
- LEVEL 32
338' 8"
- LEVEL 31
326' 0"
- LEVEL 30
319' 4"
- LEVEL 29
304' 8"
- LEVEL 28
294' 0"
- LEVEL 27
272' 8"
- LEVEL 26
272' 8"
- LEVEL 25
262' 0"
- LEVEL 24
251' 4"
- LEVEL 23
240' 8"
- LEVEL 22
230' 1"
- LEVEL 21
218' 5"
- LEVEL 20
208' 8"
- LEVEL 19
198' 1"
- LEVEL 18
187' 9"
- LEVEL 17
176' 9"
- LEVEL 16
166' 1"
- LEVEL 15
155' 5"
- LEVEL 14
144' 10"
- LEVEL 13
134' 2"
- LEVEL 12
123' 6"
- LEVEL 11
112' 10"
- LEVEL 10
101' 10"
- LEVEL 9
91' 2"
- LEVEL 8
80' 6"
- LEVEL 7
69' 10"
- LEVEL 6
59' 2"
- LEVEL 5
48' 6"
- LEVEL 4
38' 0"
- LEVEL 3
29' 6"
- LEVEL 2
20' 0"
- LEVEL 1
0'
- LEVEL B1
10' 2"
- LEVEL B2
19' 8"

PTD CONCRETE BLOCK INFILL
SLAB EDGE TO MATCH

PTD ALUMINUM

Source: HansonLA Architects, Entitlement Request, January 10, 2014.

KEY VALUE	KEYNOTE
ST-1	ABSOLUTE BLACK GRANITE BULK HEAD
GL-1	DOUBLE MIST (CLEAR)
GL-2	TRUE SEA SALT (FROSTED)
GL-3	MINK (GREY)
PTD-1	BLACK
PTD-2	WHITE
PTD-3	TERRACOTTA RED
TERRACOTTA COL-1	LIGHT GREY (R1C LIGHT GREY)
TERRACOTTA COL-2	MID GREY (R1C GREAT WALL GREY)
TERRACOTTA COL-3	DARK GREY (R1C VOLCANO GREY)
FCP	GREY CEMENTITIOUS PANEL (WJ 202)

METAL FASCIA PTD

FCP 1

3
A502

METAL CORNICE PTD-1

NEIGHBORING BUILDING
TO THE SOUTH OUTLINE

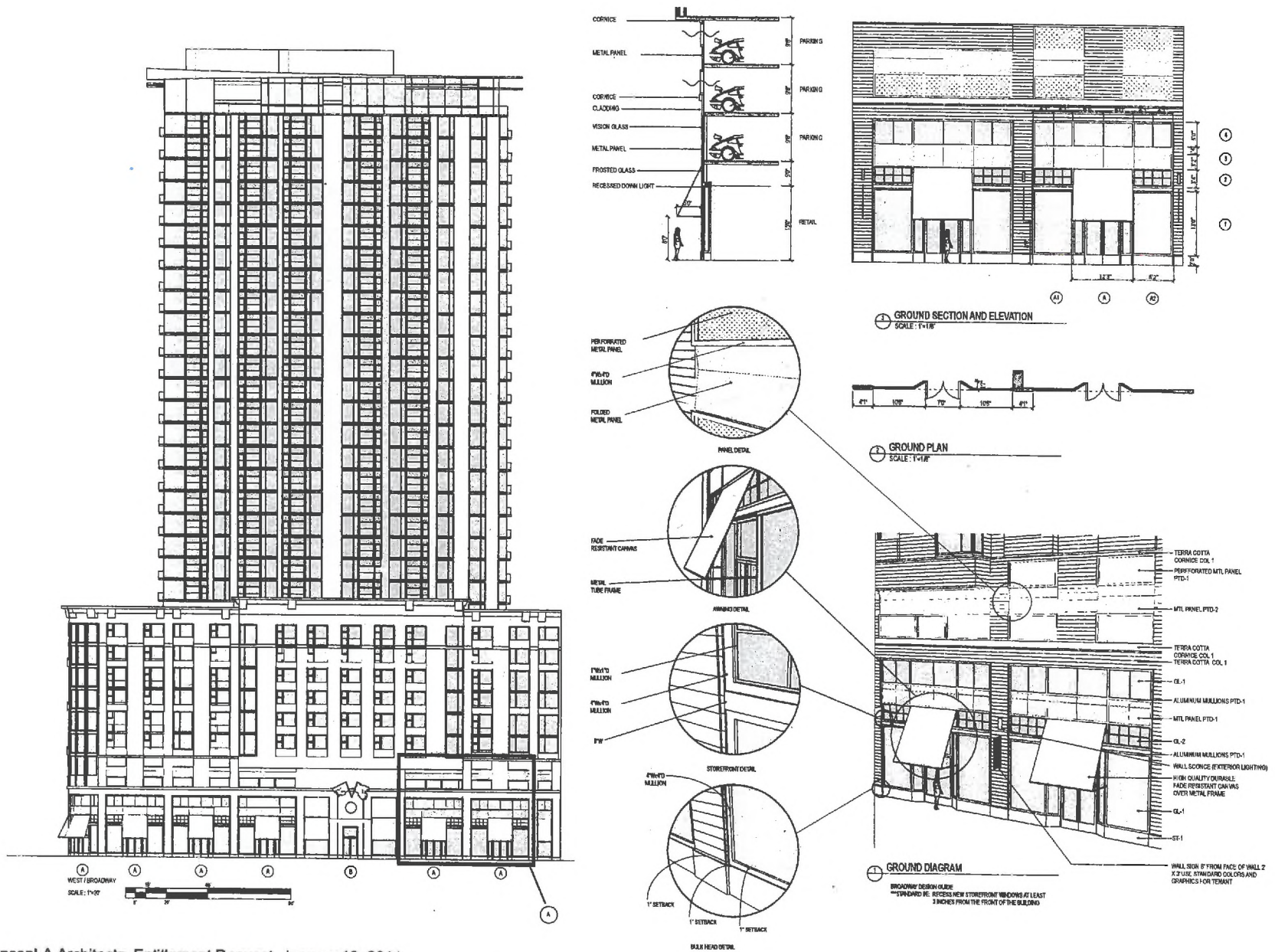
TC 3

TC 2

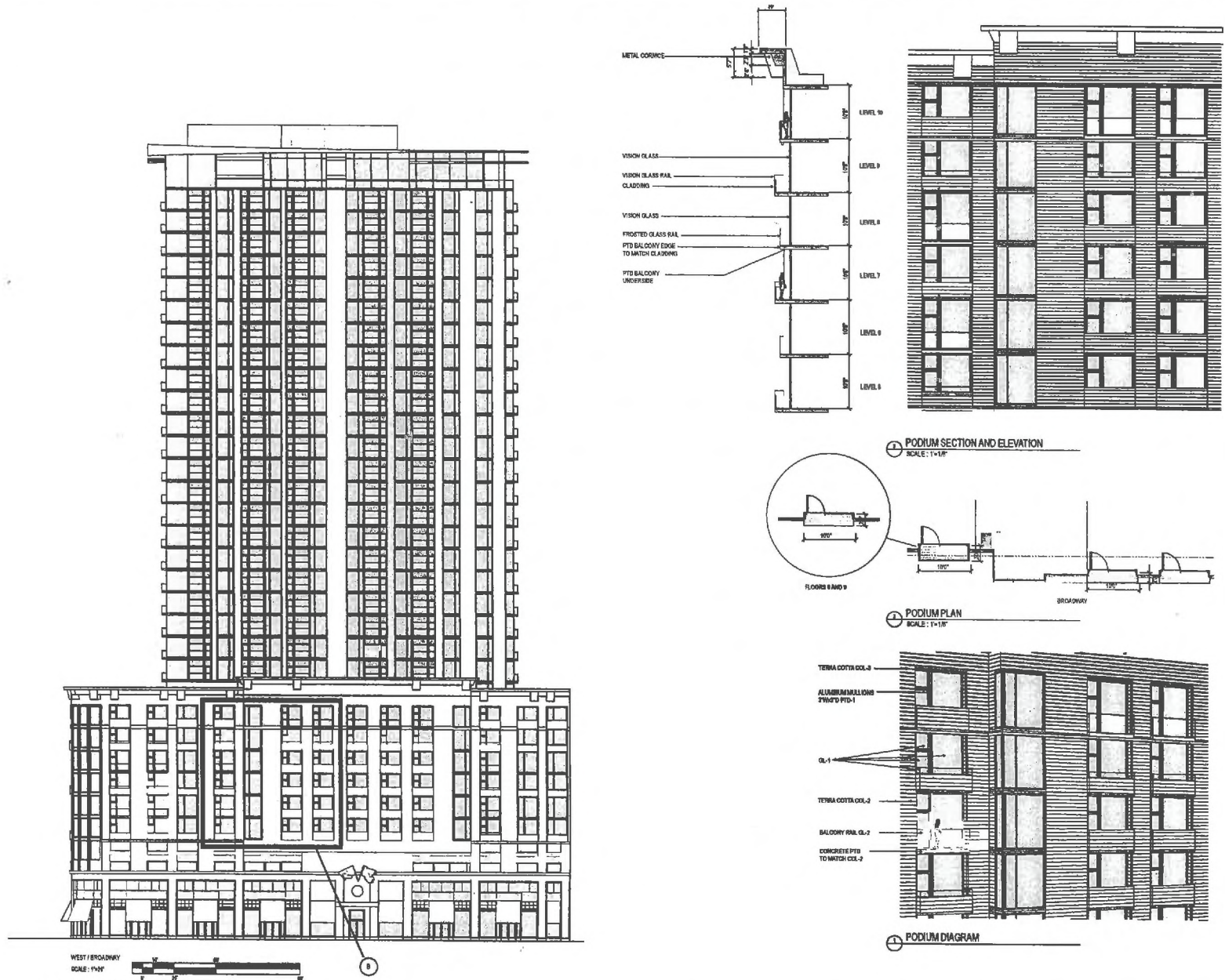
TC 1

HELIPAD	387' 11"
ROOF	376' 6"
LEVEL 34	358' 0"
LEVEL 33	347' 4"
LEVEL 32	336' 6"
LEVEL 31	326' 0"
LEVEL 30	315' 4"
LEVEL 29	304' 8"
LEVEL 28	294' 0"
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LEVEL 11	112' 10"
LEVEL 10	101' 10"
LEVEL 9	91' 2"
LEVEL 8	80' 6"
LEVEL 7	69' 10"
LEVEL 6	58' 2"
LEVEL 5	48' 8"
LEVEL 4	38' 0"
LEVEL 3	29' 6"
LEVEL 2	20' 0"
LEVEL 1	0'
LEVEL B1	10' 2"
LEVEL B2	18' 8"

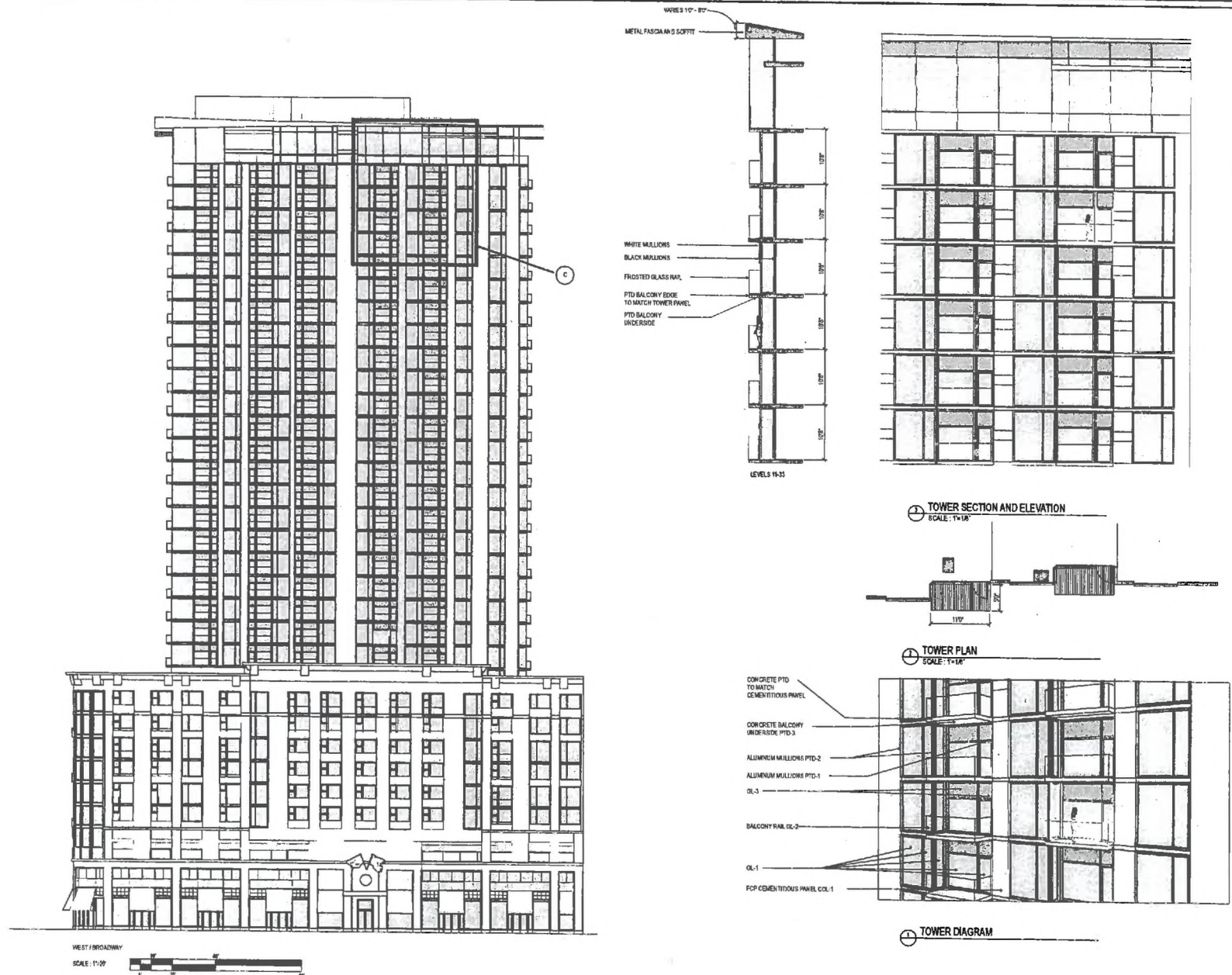
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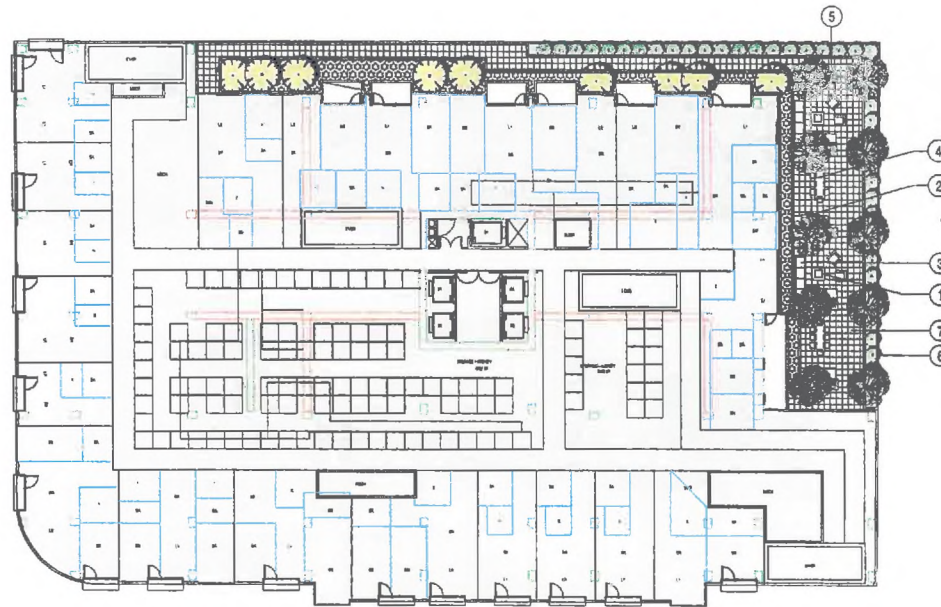
Source: HansonLA Architects, Entitlement Request, January 10, 2014.



Source: HansonLA Architects, Entitlement Request, January 10, 2014.



Source: HansonLA Architects, Entitlement Request, January 10, 2014.



BBC



FIREPIT

KEYNOTES

- 1. FIREPIT
- 2. BBC
- 3. LOUNGE SOFA
- 4. DINING TABLE
- 5. HEDGE PLANTER
- 6. SCREEN TREE
- 7. 20' x 50' PAVERS ON PEDESTAL

LANDSCAPE AREA TABULATION

7TH FL. OPEN SPACE PROVIDED = 4,813 SF.
 7TH FL. LANDSCAPE AREA REQUIRED = 1,203 SF. (25%)
 7TH FL. LANDSCAPE AREA PROVIDED = 1,994 SF. (40%)

TREE TABULATION

1 TREE / 4 UNITS.
 450 UNITS / 4 UNITS = 113 TREES REQUIRED.
 64 TREES PROVIDED.

PLANTING LEGEND

- SHADE CANOPY TREE
 - OLEA EUROPAEA NEBESIC BEAUTY OLIVE TREE 10 EA.
 - OR
 - CERCALUM DESERT MUSEUM PALO VERDE
- VERTICAL SCREEN TREE
 - QINGQI BILQIA MANDARIN TREE 9 EA.
 - OR
 - HYMENOSPORUM FLAVUM SWEETSHALZE
- SCREEN TREE
 - PODOCARPUS GRACILIOR FERNI PINE 44 EA.
 - OR
 - FIGUS MICROCARPA NITIDA INDIAN LAUREL FIG
- SHRUB PLANTING ON PLANTER



OLEA EUROPAEA NEBESIC BEAUTY OLIVE TREE



CERCALUM DESERT MUSEUM PALO VERDE



QINGQI BILQIA MANDARIN TREE



HYMENOSPORUM FLAVUM SWEETSHALZE



PODOCARPUS GRACILIOR FERNI PINE



FIGUS MICROCARPA NITIDA INDIAN LAUREL FIG

Source: HansonLA Architects, Entitlement Request, January 10, 2014.



COMMUNITY GARDEN



BENCH



PAVING



TRELLIS



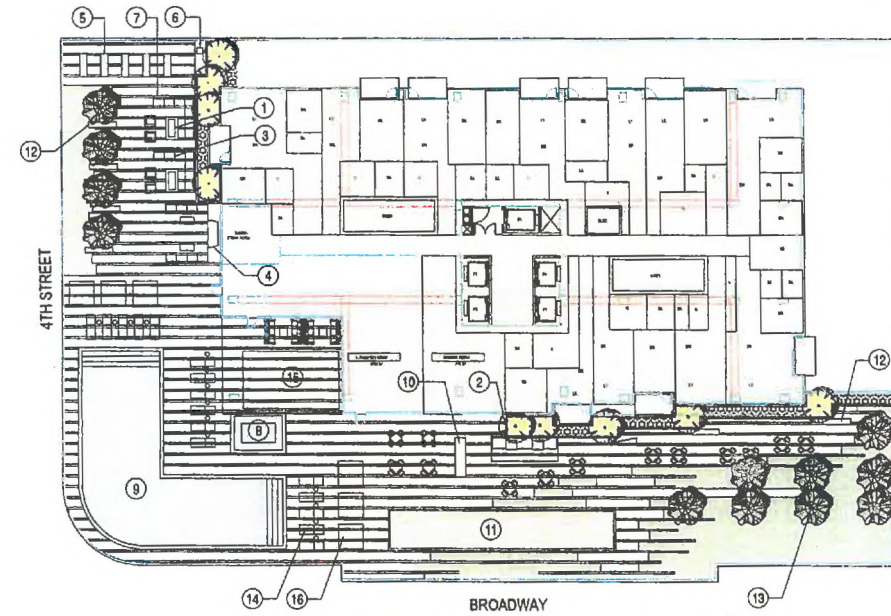
FIREPLACE



SCREEN



FIREPLACE



KEYNOTES

- 1. FIREPIT
- 2. BKG W/ TRELLIS STRUCTURE
- 3. LOUNGE SOFA
- 4. FIREPLACE
- 5. COMMUNITY GARDEN
- 6. WORK TABLE W/ SINK
- 7. SCREEN
- 8. SPA
- 9. POOL
- 10. BAR
- 11. BOCCI BALL COURT
- 12. BUILT-IN BENCH
- 13. TREE PLANTER
- 14. CHASE LOUNGE
- 15. EXERCISE AREA
- 16. CABANA



PLANTING AREA

LANDSCAPE AREA TABULATION

- 11TH FL. OPEN SPACE PROVIDED = 16,817 SF.
- 11TH FL. LANDSCAPE AREA REQUIRED = 4,204 SF. (25%)
- 11TH FL. LANDSCAPE AREA PROVIDED = 4,210 SF. (25%)

TREE TABULATION

- 1 TREE / 4 UNITS.
- 450 UNITS / 4 UNITS = 113 TREES REQUIRED.
- 64 TREES PROVIDED.

NOTE:

SEE PHOTOS OF PLANT MATERIALS ON LANDSCAPE PLAN - 7TH FL.

PLANTING LEGEND

- OLIVE CANYON TREE
- CYCAS PALM TREE
- PALMYRA PALM TREE
- OLIVE TREE
- QUERCUS agrifolia MAJESTIC BEAUTY
- QUERCUS agrifolia
- VERTICAL GREEN TREE
- GRAND BLASIA
- BROADWINGED TREE
- FICUS
- PLANT IN PLANTER
- INSTRUMENTAL GRASS AND GROUND COVER
- SHRUB PLANTING IN PLANTER



POOL & CABANA



BOCCI BALL COURT

Source: HansonLA Architects, Entitlement Request, January 10, 2014.

4. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact would occur if a project were to introduce incompatible scenic elements within a field of view containing a scenic vista or substantially block views of a scenic vista. The Project Site is located in the Central City (or downtown) community of the City of Los Angeles (the City). The existing visual character of the surrounding locale is typical of a dense urban area with multi-story buildings along Broadway, 4th Street, and Spring Street.

Views in the vicinity of the Project Site are largely constrained by structures on adjacent parcels, and the area's relatively flat topography. An urban canyon effect (i.e. the tall buildings along either side of the street create a focal point far down the street) constrains views along Broadway and 4th Street

Viewsheds refer to the visual qualities of the geographical area that is defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by artificial developments that have become prominent visual components of an area. Views in the vicinity of the Project Site are largely constrained by structures on adjacent parcels, and the area's relatively flat topography. There are no tall or topographic features on the Project Site from which scenic vistas may be obtained, or which make up part of the scenic landscape of the surrounding community. At the street level, views are limited and any potential points of visual interest in the area are the decorative facades (typically on the first floor and top level below the roof) on many of the multi-story buildings along Broadway, which would not be obscured by the Project.

As there are no designated scenic vistas in the local area, the Project will not substantially block scenic vistas, and impacts will be less than significant.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway?

Less than Significant Impact. A significant impact would occur only if scenic resources would be damaged or removed by a project within a designated scenic highway. However, the Project is located within a National Register Historic District, which is discussed below in Section 1.c).

The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The nearest historic parkway is the Arroyo Seco Historic Parkway (I-110) between milepost 25.7 and 31.9, and is approximately 2.5 miles northeast of the Project Site.

Therefore, impacts to scenic resources within a scenic highway will be less than significant.

- c) **Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

Character of Surrounding Community

The Central City Community Plan describes the Historic Core community and existing character.¹ The Historic Core, extending from First Street to approximately 11th Street between Los Angeles and Hill Street contains a large concentration of historic buildings. There are two National Register Historic Districts in the Historic Core/Central City: the Spring Street Financial District between 4th and 7th Streets and the Broadway Theater District between 3rd and 9th Streets.

The Historic Core forms the spine of Central City. It links together the Central City districts to the west that contain downtown's mix of business, finance, cultural and sports/entertainment activities to the "Markets" districts to the east that represent the large and vital array of manufacturing, distribution, wholesale, industry-related retail, social service activities; the Civic Center/Little Tokyo district to the north; and South Park to the south.

The Historic Core has evolved into three distinct subareas: a) the northern portion with its concentration of government related uses, b) the middle portion encompassing largely vacant, historic theaters and a dynamic retail shopping district along Broadway, and c) the southern portion which is emerging as an extension of the Fashion District and the South Park residential neighborhood.

The Historic Core/Center City contains a concentration of some of the most architecturally significant buildings in Southern California including a number of nationally recognized historic theater buildings. The area is also the center for wholesale and retail jewelry manufacturing and sales in the region with retail on Broadway.

Many vacant and underused commercial and office buildings in the Historic Core, especially in the Old Bank District, are being converted to residential uses. Ground-floor commercial uses are providing neighborhood-supporting retail, services and amenities for a growing residential community.

Many of the historic buildings, particularly along Spring Street, were built as financial palaces in the 1920's in the Beaux Arts style, and are now used as retail at the ground level and abandoned on the upper floors. There are a number of older hotels in the area as well. Several existing commercial buildings along Spring Street have been renovated by the City and used as offices for City agencies, extending

¹ Central City Community Plan: <http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF>

governmental uses into the Historic Core and contributing to downtown revitalization. The southern portion of the Historic Core district relates heavily to the garment district which lies in the South Markets subarea of Central City. It incorporates garment manufacturing, wholesaling and retailing. Many multi-story loft buildings with large windows and elaborately ornamented Beaux Art facades were built in the early part of this century for garment manufacturing. Street level uses are generally retail. Upper floors are used for show-rooms, offices and garment manufacturing.

The Project will create a mixed-use development that acts as a transition point between the low- and mid-rise office, commercial, and residential neighborhoods of the Historic Core, with the mid- and high-rise buildings on Bunker Hill and in the Civic Center area.

With the incorporation of Mitigation Measures 1-1 and 1-2, below, the Project will be compatible with and complementary to the surrounding area because it would consist of uses that are already existing in the area and will include architectural styles that are compatible with those already existing in the area.. The Project will construct a new, modern residential building with ground-floor commercial at the corner of Broadway and 4th Street that, as mitigated, is compatible with both the Broadway and Spring Street historic districts. See Section 5.a), Cultural Resources, of this IS/MND and Figures 4.5-4 through 4.5-12 for simulated views of the Project within the local context, including the Broadway and Spring Street historic districts.

Architectural Style and Design

The Project Site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of development, and size. Uses range from residential, retail, commercial, civic and public uses, office, cultural and recreation. The central area of Downtown Los Angeles provides walking and transit connections to these other local uses and amenities. Downtown contains everything from one- and two- story commercial buildings to mid- and high-rise office buildings. See Figures 2-10 through 2-15, Views of the Surrounding Uses.

The Project would comply with the goals and design principles of the Broadway Design Guide, as shown in Table 4.10-5, Broadway Theater and Entertainment District Design Guide. The Design Guide describes the standards that need to be met for site planning, setbacks, scale, massing, architectural design (materials, windows, glare, and lighting) and other characteristics. By complying with the Design Guide and the mitigation measures listed below, the Project will not introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area.

Additional description of the Project's style and design, including the architectural and historical context of the area is included in Section 5.a), Cultural Resources, of this IS/MND. See also Figures 2-36 through 2-38 for the ground floor, podium, and tower systems details. These figures provide keys to the awnings and windows, and other architectural elements.

The presence of projecting balconies and a high-rise tower, which are not representative of either the Broadway Historic District or the Spring Street Historic District, have the potential to materially impair the integrity and significance of the historic districts. Mitigation 1-1 will require that any balconies on the podium level be completely recessed in order to maintain compatibility with historic buildings in the area. Mitigations 1-1 and 1-2 will minimize the presence of balconies on the tower levels and reduce the overall footprint of the tower in order to reduce the massing of the tower, thereby reducing the impacts on the historic districts to a less than significant level.

Other Visual Considerations

There is the potential for impacts to the visual character of the Project Site if it is not appropriately landscaped and maintained or if signage detracts from the visual quality of the development. **Mitigation Measure 1-3** will ensure the Project Site will be landscaped (including the open spaces on the upper levels and amenities deck) and maintained. See also the landscaping plans in Figures 2-39 and 2-40.

Mitigation Measure 1-4 will ensure that on-site signage complies with the Los Angeles Municipal Code Section. Any signage size, quantity, placement, illumination, and design would also be consistent with the guidelines and standards of the Broadway Design Guide.

There is the potential for the Project Site to be visually blighted by graffiti and accumulation of rubbish and debris along the walls adjacent to the sidewalk and along Broadway and 4th Street. **Mitigation Measure 1-5** will ensure this potential impact is less than significant.

Further, while the Project Site is under construction, construction walls and barriers will be erected, which have the potential to attract unauthorized bills and postings. **Mitigation Measure 1-6** will ensure that aesthetic impacts related to construction barriers is less than significant.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed “shadow-sensitive.”

Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice, and Equinox

“Solstice” is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun’s apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year. Shadows are shown for winter solstice and summer solstice, cast from 9:00AM to 3:00PM (winter) and 9:00AM to 5:00 PM (summer).

“Equinox” is defined as either of two points of intersection of the sun’s apparent annual path and the plane of the earth’s equator, that is, a point of intersection of the ecliptic and the celestial equator. At the equinoxes day and night are the same duration as the sun’s transit falls on the equator. Shadows cast on the equinoxes are intermediary between the solstices. Shadows are shown for the equinox from 9:00AM to 5:00PM. Shadows cast during the spring equinox and autumnal equinox are not identical due to Daylight Savings Time shifting the time-frame earlier by one hour during the autumnal equinox.

Thresholds of Significance²

Impact Criteria for City of Los Angeles

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Assumptions

Building heights were based on the design drawings provided by the architect.

Sensitive Uses

Sensitive uses include, but are not limited to: residential, institutional (such as a school) or other land use types where sunlight is important to function, physical comfort, or commerce.

² L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.

The screening criteria is for shadow-sensitive uses on the north, northwest, or northeast of a Project, as that is generally the path shadows will be projected.

There are no shadow-sensitive uses to the north, northwest, or northeast of the Site. These uses are office, commercial/retail, surface parking lot, and parking structure. None of these uses are considered sensitive to the effects of shading. The surrounding area is zoned Commercial (C2 and C4).

The shadow-sensitive (residential) use nearby is the adjacent apartment building (The Judson).

There are also residential buildings to the southeast along Spring Street and 4th Street. Both of these residential uses have an underlying zone of Commercial (C4).

The Traffic Study identified a future related project at 348 Broadway that would contain residential uses.

Project Impacts

Spring Shadows

As shown in Figure 4.1-1, Spring Shadows, the Project will cast shadows to the north-west through the north-east during the spring equinox. During the transit of the sun, from 9:00 AM to 3:00 PM, shadows from the Project Site will fall upon nearby office, commercial/retail, surface parking lot, and parking structure uses to the north-west, north and north-east.

The future residential related project at 348 Broadway would be shaded at 1 PM, but not before 12 PM or after 3 PM. Thus, it would not be shaded by more than 3 hours.

No sensitive uses will be shaded for more than 3 hours between the hours of 9:00 AM and 3:00 PM. Consequently, spring shadow impacts from the Project will be less than significant.

Summer Shadows

As shown in Figure 4.1-2, Summer Shadows, the Project will cast shadows to the west through the east during the summer solstice. During the transit of the sun, from 9:00 AM to 5:00 PM, shadows from the Project Site will fall upon office, commercial/retail, surface parking lot, parking structure, and multi-family residential uses near the project site.

The multi-family residential building is located at the corner of Spring Street and 4th Street. However it would not be shaded at 4 PM, and only be shaded at 5 PM, for less than 1 hour of shading.

No sensitive uses will be shaded for more than 4 hours between the hours of 9:00 AM and 5:00 PM. Consequently, summer shadow impacts from the Project will be less than significant.

Fall Shadows

As shown in Figure 4.1-3, Fall Shadows, the Project will cast shadows to the north-west through the north-east during the autumnal equinox. During the transit of the sun, from 9:00 AM to 5:00 PM, shadows from the Project will fall upon office, commercial/retail, surface parking lot, parking structure, and multi-family residential uses, to the north-west through north-east.

The multi-family residential use is the adjacent apartment building (The Judson) directly to the south. However it would only be shaded partially at 9 AM and not at 10 AM, for less than 1 hour of shading.

The future residential related project at 348 Broadway would be shaded from 2 PM to 4 PM. It would not be shaded at 1 PM. Thus, it would not be shaded by more than 4 hours.

No sensitive uses will be shaded for more than 4 hours between the hours of 9:00 AM and 5:00 PM. Consequently, fall shadow impacts from the Project will be less than significant.

Winter Shadows

As shown in Figure 4.1-4, Winter Shadows, the Project sites will cast far-reaching shadows to the north-west and north-east during the winter solstice. During the transit of the sun, from 9:00 AM to 3:00 PM, shadows from the Project Site will fall upon commercial/retail, office, Angels Knoll park, surface parking, parking structure, and multi-family residential uses

The future residential related project at 348 Broadway would be shaded from 1 PM to 3 PM. It would not be shaded at 12 PM. Thus, it would not be shaded by more than 3 hours.

No sensitive uses will be shaded for more than 3 hours between the hours of 9:00 AM and 3:00 PM. Consequently, winter shadow impacts from the Project will be less than significant.

Mitigation Measures

1-1 Aesthetics (Balconies)

- Balconies on the podium levels (floors 1 through 10) shall not project from the building façade.
- Balconies on the tower (floors 11 through 34) shall not project more than 12 inches from the building façade.

1-2 Aesthetics (Tower)

- The tower portion of the building (floors 11 through 34) shall cover no less than 30 percent of the total lot area and no more than 31.5 percent of the total lot area.
- Balconies shall be counted when determining lot coverage.

1-3 Aesthetics (Landscape Plan)

All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec.12.40-D) and to the satisfaction of the decision maker.

1-4 Aesthetics (Signage)

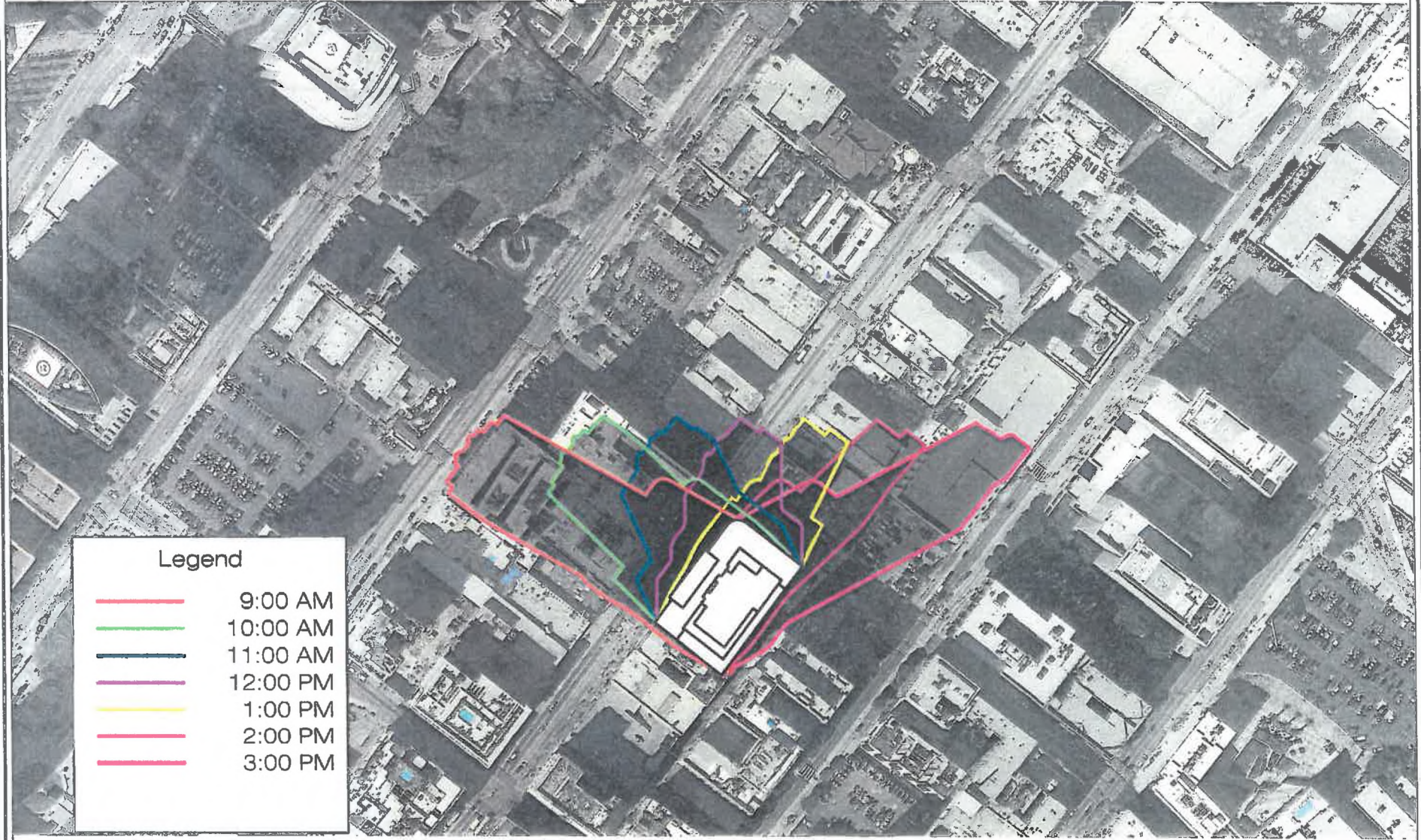
- On-site signs shall be limited to the maximum allowable under the Municipal Code.
- Multiple temporary signs in store windows and along building walls are not permitted.

1-5 Aesthetics (Vandalism)

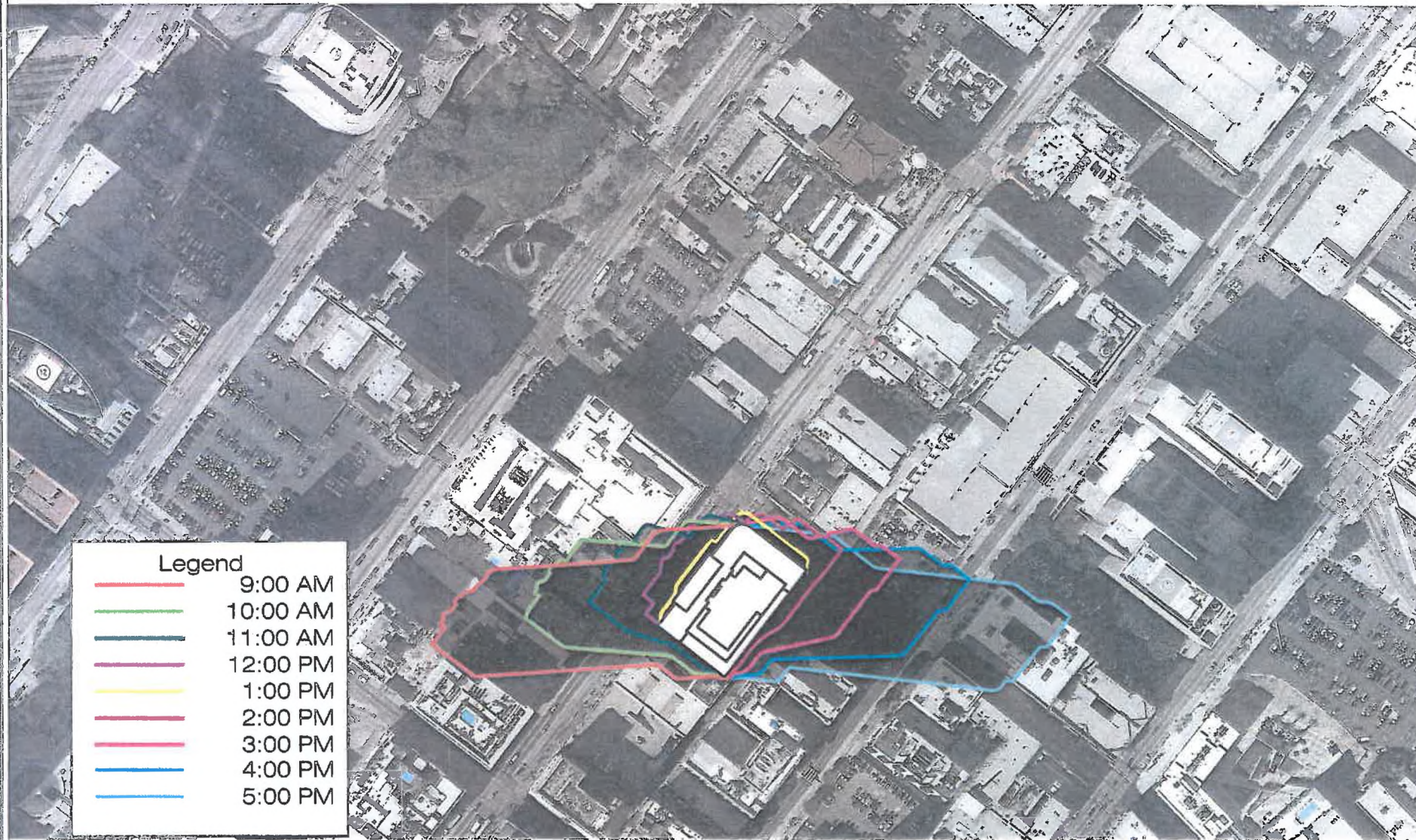
- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.

1-6 Aesthetics (Signage on Construction Barriers)

- The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS".
- Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.



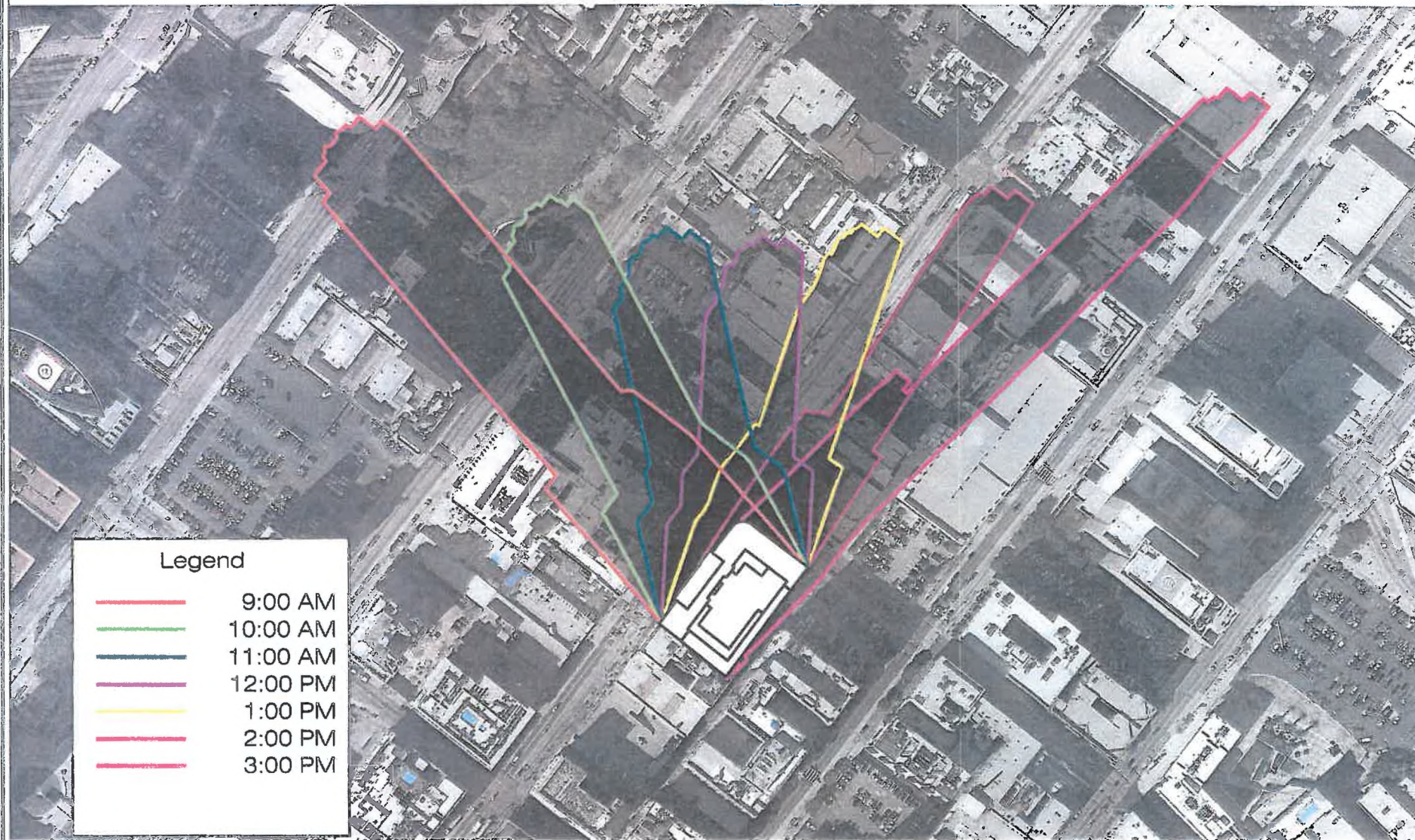
Source: Scott A. Johnson Consulting.



Source: Scott A. Johnson Consulting.



Source: Scott A. Johnson Consulting.



Source: Scott A. Johnson Consulting.

- d) **Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways.

The Project Site and surrounding area contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights.

In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling and parked on streets in the vicinity of the Project Site.

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial uses. Vehicle headlights from traffic on local surface streets also contribute to overall ambient lighting levels. In addition, Broadway and 4th Street are major thoroughfares with consistent traffic that further contributes to the amount of ambient lighting.

Outside lighting on the Project Site consists of light fixtures on the sides of the existing buildings, signage, and freestanding streetlights.

The Project would create additional sources of illumination, as the Site would go from containing a one-story retail building with rooftop parking to a Site containing a multi-story building with residential and retail uses. Exterior lighting will be shielded and directed onto the Project Site and away from adjacent uses to the maximum extent feasible and consistent with safety and security requirements. In addition to increasing the ambient “glow” presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over onto and illuminate, off-site vantages including adjacent land uses.

The Project will increase ambient light levels in the vicinity. However, the increase will not be substantial as the Project Site is located in an urbanized area of Downtown Los Angeles that is already illuminated at night and would be compatible with surrounding uses. However, exterior lighting that spills onto adjacent residential properties (such as the Judson Building) could be a potentially significant impact.

With the incorporation of the mitigation measure below, exterior lighting will be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. Therefore, the change in levels of ambient illumination as a result of the Project will be less than significant.

In addition, the Project will comply with the glare and lighting guidelines and standards of the Broadway Design Guide.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. Building surfaces or glass windows have the potential to create glare, particularly during the early morning and later afternoon time periods.

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways (Broadway and 4th Street) and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used.

Since the Project buildings will be constructed with materials that have minimal potential for generating glare, the Project is not expected to create unusual or isolated glare impacts. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating. The Project will not result in a new source of substantial glare. Impacts as a result of glare generated by the Project will be less than significant with implementation of **Mitigation Measure 1-8**.

In addition, the Project will comply with the glare and lighting guidelines and standards of the Broadway Design Guide.

Mitigation Measures

1-7 Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

1-8 Aesthetics (Glare)

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat

AGRICULTURE AND FORESTRY RESOURCES

- a) **Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?**

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California.

The Project Site is developed with a commercial building and is designated Regional Center Commercial (zoned [Q]C4-4D-CDO). The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.³

Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

- b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.⁴

The Project Site does not contain any State-designated agricultural lands or open space. Thus, the Project Site is not subject to a Williamson Act Contract. The Project Site contains a commercial building and thus will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use

³ State of California Department of Conservation, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map*, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, June 12, 2013.

⁴ State of California Department of Conservation, *Williamson Act Program*, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, accessed June 12, 2013.

to non-agricultural use. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

- c) **Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

No Impact. The Project Site is developed with a commercial building and is designated Regional Center Commercial (zoned [Q]C4-4D-CDO). Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impacts related to forest land or timberland will occur.

- d) **Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. The Project Site is developed with a commercial building, completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land will occur.

- e) **Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

3. AIR QUALITY

The section is based in part on the following report:

Air Quality, Noise, and Greenhouse Gases Impact Report, Douglas Kim + Associates, September 2013.

- a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

Less Than Significant Impact. In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the “Basin”), the applicable plan is the 2007 *Air Quality Management Plan* (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The proposed retail and residential land uses will neither conflict with the SCAQMD’s 2012 Air Quality Management Plan (AQMP) nor jeopardize the region’s attainment of air quality standards.

While the proposed mixed-use project will increase population in the City of Los Angeles by approximately 693 persons, it will not jeopardize the region’s attainment of air quality standards. Specifically, the Project is consistent with the City of Los Angeles’ General Plan, as well as growth projections used by SCAG’s 2012 Adopted Growth Forecast to identify future air quality emissions that must be mitigated through the AQMP. The Project would represent a negligible percent of the estimated 2013 population and housing units in the City, as listed by the California Department of Finance (2010 baseline based on 2010 Census and 2013 data estimate).⁵

The new jobs for the retail spaces are within the parameters of growth projected by the City of Los Angeles and SCAG. The Project is mixed-use, bringing new retail and residential development close to existing retail, office, civic, office, cultural, recreational, and residential uses in the Downtown Los Angeles. Mixed-use development encourages walkable communities and minimizes vehicle miles traveled. Moreover, the Project is infill development that helps to ensure that the residences associated with this Project have less impact on air quality emissions than a project located in areas with less density and/or transportation infrastructure. Further, the ground-floor retail uses in this infill development are

⁵ State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2013*. Sacramento, California, May 2013: <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>

likely to attract a higher-than-average share of local residents and employees from local businesses that are less likely to drive vehicles than those living in less dense environments. As a result, the Project would not conflict with or obstruct the 2012 AQMP, and impacts would be less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Unless Mitigation Incorporated. A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

Both short-term impacts occurring during construction (e.g., site grading, haul truck trips) and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. “Emissions” refer to the quantity of pollutants released into the air. “Concentrations” refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($\text{PM}_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.⁶ The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's

⁶*Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O₃) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_x) react in the presence of ultraviolet sunlight. O₃ is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x, the components of O₃, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O₃ formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O₃ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.
- Nitrogen Dioxide (NO₂) like O₃, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. NO₂ also contributes to the formation of PM₁₀. High concentrations of NO₂ can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.
- Sulfur Dioxide (SO₂) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO₂ are coal and oil used in power plants and industries. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM_{2.5}, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as SO₂, NO_x, and VOC. Inhalable particulate matter, or PM₁₀, is about 1/7 the thickness of a human hair. Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

The United States Environmental Protection Agency (USEPA) is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer

continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by CARB.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The CAA requires USEPA to designate areas as attainment, non-attainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table 4.3-1, State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin. The USEPA has classified the South Coast Air Basin as non-attainment for O₃, PM_{2.5}, and PM₁₀ and maintenance for CO and NO₂.

State

In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). The California Air Resources Board (CARB), which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table 4.3-1, State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin.

The CCAA requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a non-attainment area for O₃, PM_{2.5}, and PM₁₀.⁷

⁷CARB, *Area Designation Maps*, available at <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed August 17, 2013.

Table 4.3-1

State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	N/A ¹	0.075 ppm (147 µg/m ³)	Non-attainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Non-attainment
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	15 µg/m ³	Non-attainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Non-attainment	53 ppb (100 µg/m ³)	Maintenance
	1-hour	0.18 ppm (338 µg/m ³)	Non-attainment	100 ppb (188 µg/m ³)	Maintenance
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Non-attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Attainment

¹N/A = CARB has not determined 8-hour O₃ attainment status
Source: CARB, Ambient Air Quality Standards, and attainment status, accessed February 15, 2013
(www.arb.ca.gov/desig/adm/adm.htm)
From Table 3-1 of Air Quality, Noise, and Greenhouse Gases Impact Report.

Local

South Coast Air Quality Management District (SCAQMD)

The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as non-attainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour PM_{2.5} strategy standard by 2014.

In addition to criteria pollutants, the SCAQMD also regulates air toxics. A cornerstone of its work was the development of the Multiple Air Toxics Exposure Study (MATES-III). The monitoring program measured more than 30 air pollutants, including both gases and particulates, and estimated the risk of cancer from breathing toxic air pollution throughout the region. MATES-III found that the cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million. An addendum to the plan was completed in March 2004 that included an update on the implementation of the mobile and stationary source strategies.

In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles

The project is located in the Central City Community Plan Area. Air quality policies are governed by the City's General Plan, which includes an Air Quality Element. Adopted on November 24, 1992, the Element includes six key goals that relate directly or indirectly to air quality:

1. Good air quality in an environment of continued population growth and healthy economic structure
2. Less reliance on single-occupant vehicles with fewer commute and non-work trips
3. Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques
4. Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality
5. Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
6. Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

The City issues discretionary permits by ensuring proposed projects are consistent with these broad themes.

Existing Air Quality

Air Monitoring Data

The SCAQMD monitors air quality conditions at 40 locations throughout the Basin. The project site is located in Area 1 of the SCAQMD's Metropolitan Monitoring Subregion. Historical data from the Central LA receptor area (Source No. 1) was used to characterize existing conditions in the vicinity of the project area.

Table 4.3-2, Ambient Air Quality Conditions, shows pollutant levels, State and federal standards, and the number of exceedances recorded at the Central Los Angeles monitoring station from 2009 to 2011.⁸ The one-hour State standard for O₃ was not exceeded in 2011, though there were three exceedances of the State 1-hour standard and one exceedance of the federal 8-hour standard for O₃ in 2009 and one exceedance of the State and federal standards in 2010. CO and NO₂ levels did not exceed the CAAQS from 2009 to 2011. Localized PM₁₀ and PM_{2.5} concentrations have generally declined at this station over the past three documented years.

⁸ Note: The SCAQMD recently released 2011 monitoring data. The 2012 data will not be available until early 2014.

**Table 4.3-2
Ambient Air Quality Conditions**

Pollutant	Pollutant Concentration and Standard	Central LA		
		2009	2010	2011
Ozone	Maximum 1-hr Concentration (ppm)	0.14	0.10	0.09
	Days > 0.09 ppm (State 1-hr standard)	3	1	0
	Days > 0.075 ppm (Federal 8-hr standard)	1	1	0
Carbon Monoxide	Maximum 1-hr concentration (ppm)	3.0	3.0	N/A
	Days > 20 ppm (State 1-hr standard)	0	0	N/A
	Maximum 8-hr concentration (ppm)	2.2	2.3	2.4
	Days > 9.0 ppm (State 8-hr standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hr Concentration (ppm)	0.12	0.09	0.1
	Days > 0.18 ppm (State 1-hr standard)	0	0	0
PM ₁₀	Maximum 24-hr concentration (µg/m ³)	72	42	53
	Days > 50 µg/m ³ (State 24-hr standard)	4	0	1
PM _{2.5}	Maximum 24-hr concentration (µg/m ³)	62	39	49
	Days > 35 µg/m ³ (Federal 24-hr standard)	7	2	4
Sulfur Dioxide	Maximum 24-hr Concentration (ppm)	0.01	0.01	0.02
	Days > 0.04 ppm (State 24-hr standard)	0	0	0

From Table 3-2 of Air Quality, Noise, and Greenhouse Gases Impact Report

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Nearby receptors to the Project Site include:

- Several multi-family residences within a quarter mile of the Project Site. The nearest of these is the property adjacent to the Project Site, which is located at 424 S. Broadway. There are also multi-

family residences 270 feet to the southwest, 400 feet to the south, and 440 feet to the southwest of the Project Site

- Spring Street Park located 250 feet southeast of the Project Site.
- Angel's Knoll located 530 feet to the northwest of the Project Site.
- Cal-Tot Child Care Center located 660 feet to the northeast of the Project Site.
- Pershing Square located 680 feet to the southwest of the Project Site.

The above sensitive receptors represent the nearest sensitive receptors with the potential to be impacted by air emissions. Additional receptors are located further from the project site in the surrounding community and would be less impacted by air emissions than the above receptors.

Methodology

Construction

The analysis of construction-related air quality impacts is consistent with guidance from the SCAQMD CEQA Air Quality Handbook (1993 edition) and updated guidance. Regional and localized construction emissions were calculated using the CalEEMod model (version 2013.2). This analysis assumes a conservative 41-month construction period using the following assumptions:

Phase 1: Demolition

- Duration: 2 weeks, starting Third Quarter 2014
- Demolition Amount: 14,000 square feet of one-story buildings and garage
- Total Operating Equipment: 1 concrete saw, 2 rubber tired loader, 3 excavators

Phase 2: Site Preparation

- Duration: 2 weeks, starting Third Quarter 2014
- Full-time Operating Equipment: 2 tractor/loader/backhoes, 1 rubber tired dozer
- Maximum acres of land to be graded in one day: 0.25

Phase 3: Grading and Earthwork

- Duration: 2.5 months, with 27,777 cubic yards of material exported

- Full-time Operating Equipment: 1 excavator, 1 rubber tired dozer, 1 rubber tired dozer, water truck, 3 tractor/loader/backhoes
- Maximum acres of land to be graded in one day: 0.25

Phase 4: Construction

- Duration: 36 months, starting October 2014
- Full-time Operating Equipment: 1 crane, 3 forklifts, 1 generator set, 3 tractor/loader/backhoes, 1 welder.

Phase 5: Asphalt Paving

- Duration: 2 weeks
- Total Operating Equipment: 1 paver, 1 roller, 1 paving equipment.

Phase 6: Architectural Coatings

- Duration: 6 weeks
- Total Operating Equipment: 1 air compressor
- Assumes mix of coatings that average 50 g/L VOC for interior applications and 75 g/L VOC for exterior applications. SCAQMD Rule 1113 (Architectural Coatings) has limits on common coatings: Flats (50 g/L), Non-Flats (50 g/L), Primers/Sealers/Undercoaters (100 g/L), Stains (100 g/L), Waterproofing Sealers (100 g/L).

Operations

The analysis used the CalEEMod model (Version 2013.2) to calculate operational mobile and area source emissions. CalEEMod uses CARB's EMFAC2011 emissions model to estimate motor vehicle emissions and the US EPA's AP-42 and OFFROAD2011 emissions factors to analyze emissions from off-road construction equipment.

Significance Criteria

Construction Phase Significance Criteria

Based on guidance from the SCAQMD, the proposed project would have a significant impact if:

- Daily regional construction emissions exceed SCAQMD construction emissions thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀, as presented in Table 4.3-3, SCAQMD Construction Emissions Thresholds;
- Daily localized construction emissions exceed SCAQMD construction emissions thresholds for NO_x, CO, PM_{2.5}, or PM₁₀, as presented in Table 4.3-3, SCAQMD Construction Emissions Thresholds;
- The proposed project would generate TAC emissions that generate a health risk that exceeds ten persons in one million; and/or
- The proposed project would create an odor nuisance.

**Table 4.3-3
SCAQMD Construction Emissions Thresholds**

Criteria Pollutant	Regional Emissions (Pounds Per Day)	Localized Emissions (Pounds Per Day) ¹
Volatile Organic Compounds (VOC)	75	--
Nitrogen Oxides (NO _x)	100	74
Carbon Monoxide (CO)	550	680
Sulfur Oxides (SO _x)	150	--
Fine Particulates (PM _{2.5})	55	2
Particulates (PM ₁₀)	150	4

¹ Localized thresholds based on 25-meter receptor distance and a one acre per day grading schedule in the Central LA source receptor area.
Source: SCAQMD, 2013.
From Table 3-3 of Air Quality, Noise, and Greenhouse Gases Impact Report.

Operations Phase Significance Criteria

Based on SCAQMD guidance, the proposed project would have a significant impact if:

- Daily operational emissions exceed SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀, as presented in Table 4.3-4, SCAQMD Daily Operational Emissions Thresholds;
- Project-related traffic causes CO concentrations at study intersections to violate the CAAQS for either the one- or eight-hour period. The CAAQS for the one- and eight-hour periods are 20 ppm and 9.0 ppm, respectively;
- The proposed project would generate significant emissions of TACs;

- The proposed project would create an odor nuisance; and/or
- The proposed project would not be consistent with the AQMP.

**Table 4.3-4
SCAQMD Daily Operational Emissions Thresholds**

Criteria Pollutant	Pounds Per Day
Volatile Organic Compounds (VOC)	55
Nitrogen Oxides (NO _x)	55
Carbon Monoxide (CO)	550
Sulfur Oxides (SO _x)	150
Fine Particulates (PM _{2.5})	55
Particulates (PM ₁₀)	150

*Source: SCAQMD, 2012
From Table 3-4 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Project Impacts

Construction Phase

Regional Impacts

Construction of the proposed project will impact air quality through the use of heavy-duty construction equipment. NO_x emissions would primarily result from the use of diesel-fueled construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the type of operation, and technology employed in the equipment used.

Table 4.3-5, Estimated Daily Construction Emissions – Unmitigated, shows the estimated daily emissions associated with each construction phase.

Daily VOC, CO, SO_x, PM_{2.5}, and PM₁₀ emissions would not exceed the SCAQMD regional thresholds. As such, the project’s short-term construction impacts would result in less than significant impacts to regional air quality.

**Table 4.3-5
Estimated Daily Construction Emissions - Unmitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition						
On-Site Emissions	5	50	36	<1	4	3

**Table 4.3-5
Estimated Daily Construction Emissions - Unmitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Off-Site Emissions	1	2	3	0	<1	<1
Total Emissions	5	52	39	<1	4	3
Site Preparation						
On-Site Emissions	2	22	16	<1	7	4
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	22	17	<1	7	4
Grading						
On-Site Emissions	4	41	27	<1	9	6
Off-Site Emissions	4	22	16	<1	2	1
Total Emissions	8	63	43	<1	11	6
Building Construction						
On-Site Emissions	4	31	19	<1	2	2
Off-Site Emissions	9	8	34	<1	4	1
Total Emissions	13	39	53	<1	6	3
Asphalt Paving						
On-Site Emissions	1	10	7	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	1	10	8	<1	1	1
Architectural Coating						
On-Site Emissions	72	2	2	<1	<1	<1
Off-Site Emissions	1	<1	4	<1	1	<1
Total Emissions	74	2	6	<1	1	<1
Maximum Regional Total	74	63	53	<1	11	6
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Regional Total	72	41	27	<1	9	6

**Table 4.3-5
Estimated Daily Construction Emissions - Unmitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Localized Significance Threshold	--	74	680	--	4	2
Exceed Threshold?	No	No	No	No	Yes	Yes

*Source: DKA Planning, 2013 based on CalEEMod 2013.2 model runs.
From Table 3-5 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Localized Impacts

At a local level, the construction of the Project will produce emissions that could impact air quality near the Project Site. For example, fugitive dust emissions would result from demolition and site preparation (e.g., grading) activities. Other pollutants can impact human health near the Project without affecting regional air quality. These are important considerations given the immediate proximity of multi-family residential buildings directly adjacent to the project site.

To assess the air quality impact of localized construction emissions of PM_{2.5}, PM₁₀, CO, and NO₂, the SCAQMD’s recommended Localized Significance Threshold (LST) methodologies were used.⁹ Localized on-site emissions were calculated using similar methodology to the regional emission calculations. LSTs were developed based upon the size of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor.

As shown in Table 4.3-5, Estimated Daily Construction Emissions – Unmitigated, the proposed scale of grading activities would produce over 9 lbs/day of PM₁₀ emissions, which exceeds the SCAQMD’s recommended local threshold of 4 lbs/day. This threshold is appropriate given the proximity of residential units along Broadway and 4th Street. Similarly, grading activities would produce over 6 lbs/day of PM_{2.5} emissions, which exceeds the SCAQMD’s recommended local threshold of 2 lbs/day. These are considered significant but mitigable impacts on regional air quality.

Mitigation Measures

Construction

While construction of the Project would result in significant impacts to local air quality, **Mitigation Measure 3-1** would reduce fugitive PM₁₀ and PM_{2.5} emissions below the localized threshold of significance by applying water in sufficient quantities to prevent the generation of visible dust plumes.

⁹The concentrations of SO₂ are not estimated because construction activities would generate a small amount of SO_x emissions. No State standard exists for VOC. As such, concentrations for VOC were not estimated.

Mitigation Measure 3-2 is necessary to help ensure that application of solvents, paints, and other coatings do not exceed the SCAQMD's thresholds for regional VOC emissions during construction.

The City also requires **Mitigation Measure 3-3** to ensure that potential emissions impacts due to demolition, grading, and construction would be less than significant.

3-1 Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes.

3-2 Architectural Coating

The project shall utilize only low- and non-VOC containing paints, sealants, adhesives, and solvents in the construction of the project. The average VOC content of the coating shall be 50 g/L for all interior surfaces and 75 g/L for all exterior surfaces.

3-3 Air Pollution (Demolition, Grading, and Construction Activities)

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.
- To reduce on-site construction related air quality emissions, the Project Applicant shall ensure all construction equipment meet or exceed Tier 3 off-road emission standards.

Impacts After Mitigation

Regional Emissions

As shown in Table 4.3-6, Estimated Daily Construction Emissions - Mitigated, construction emissions of CO, VOC, NO_x, PM₁₀, PM_{2.5} and SO_x would be less than the SCAQMD significance thresholds.

Localized Emissions

As shown in Table 4.3-6, Estimated Daily Construction Emissions – Mitigated, all localized construction impacts would be considered less than significant.

**Table 4.3-6
Estimated Daily Construction Emissions - Mitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition						
On-Site Emissions	<1	2	24	<1	1	<1
Off-Site Emissions	1	2	3	0	1	<1
Total Emissions	1	4	27	<1	2	<1
Site Preparation						
On-Site Emissions	<1	1	9	<1	2	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	<1	1	10	<1	2	1
Grading						
On-Site Emissions	<1	2	20	<1	2	1
Off-Site Emissions	4	22	16	<1	2	1
Total Emissions	4	24	36	<1	4	2
Building Construction						
On-Site Emissions	<1	2	17	<1	<1	<1
Off-Site Emissions	9	8	34	<1	4	1
Total Emissions	9	10	51	<1	4	1
Asphalt Paving						
On-Site Emissions	<1	1	8	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	<1	1	9	<1	<1	<1
Architectural Coating						
On-Site Emissions	72	2	2	<1	<1	1

**Table 4.3-6
Estimated Daily Construction Emissions - Mitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Off-Site Emissions	1	<1	4	<1	1	<1
Total Emissions	74	2	6	<1	1	<1
Maximum Regional Total	74	24	51	<1	4	2
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Regional Total	72	2	24	<1	2	1
Localized Significance Threshold	--	74	680	--	4	2
Exceed Threshold?	No	No	No	No	No	No

*Source: DKA Planning, 2013 based on CalEEMod 2013.2 model runs.
From Table 3-6 of Air Quality, Noise, and Greenhouse Gases Impact Report*

Operational Phase

Regional Impacts

The Project will produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 2,266 more vehicle trips to and from the Project Site on its peak day, with up to 212 more vehicles entering and exiting the Site in the peak afternoon hour.¹⁰

As shown in Table 4.3-7, Estimated Daily Operations Emissions, regional operational emissions would not exceed SCAQMD significance thresholds, and would result in a less-than-significant impact.

¹⁰ Crain & Associates, Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, August 2013.

**Table 4.3-7
Estimated Daily Operations Emissions**

Emissions Source	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	11	<1	38	0	<1	<1
Energy Sources	<1	1	<1	0	<1	<1
Mobile Sources	28	27	109	<1	19	6
Total Operations	40	28	147	<1	19	6
SCAQMD Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

*Source: DKA Planning 2013 based on CalEEMod 2013.2 model runs.
From Table 3-7 of Air Quality, Noise, and Greenhouse Gases Impact Report*

Localized Impacts

Long-term operations of the project could produce localized impacts. CO standards could be exceeded at congested intersections with extreme traffic volumes during colder days when CO levels tend to be highest. An exceedance of the State CO standards at an intersection is referred to as a CO hotspot. Based on cleaner engine combustion and cleaner fuels, projected ambient CO concentrations all but assure that CO standards will not be exceeded.

Table 4.3-8, Project Future Year CO Concentrations (ppm), illustrates projected ambient CO concentrations at the nearest representative monitoring station.

The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios are increased by two percent at intersections with a Level of Service (LOS) of D or worse. SCAQMD also recommends a CO hotspot evaluation when an intersection LOS degrades from acceptable to unacceptable LOS.

The traffic study for the Project finds that none of the ten intersections analyzed near the Project Site would significantly degrade in LOS in the Future (2017) scenarios with and without the Project, whether looking at the AM or PM peak periods of traffic. When combined with the ambient CO concentrations in the project area, a CO hotspot analysis is not required.

As a result, CO concentrations at study intersections would not exceed the State one- and eight-hour CO standards of 20 and 9.0 ppm, respectively. The Project would result in a less-than-significant impact on localized CO concentrations.

**Table 4.3-8
Projected Future Year CO Concentrations (ppm)**

Central LA Monitoring Station	1-Hour	8-Hour
2010	5.1	4.6
2015	5.1	4.6
2020	5.1	4.6
Applicable Standard	20	9
Exceed Clean Air Standard?	No	No

*Source: South Coast Air Quality Management District "Projected Future Year 1-Hour Concentration (ppm)" and "Projected Future Year 8-Hour Concentration (ppm)"
From Table 3-8 of Air Quality, Noise, and Greenhouse Gases Impact Report*

Mitigation Measures

Operational

3-4 Air Pollution (Operational)

The building shall not include fireplaces in any residential units or common areas.

Impacts After Mitigation

With the incorporation of the above mitigation measures, operational impacts would be less than significant.

- c) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?**

Less Than Significant Impact. The project’s cumulative impact on air quality is judged in three key ways:

- 1 Will the project increase the frequency or severity of existing local air quality violations or cause or contribute to new local air quality violations?
- 2 Will the project exceed the assumptions utilized in preparing the AQMP?
- 3 Is the project consistent with any local air quality plans or policies?

Cumulative Impacts on Local Air Quality

The Project would not contribute significantly to cumulative impacts on localized CO, NO_x, PM₁₀, or PM_{2.5} concentrations. CO hotspots are not expected from cumulative growth in the area of the Project. In addition, the Project does not exceed the Localized Significance Thresholds (LST) set by the SCAQMD for NO_x and PM emissions. Future development that contributes to cumulative growth would be required to address LSTs and perform dispersion modeling if potential violations of health standards were to occur.

As a result, the Project will not result in significant cumulative impacts on local air quality.

Consistency with Assumptions from the Air Quality Management Plan

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP). The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

While the Project will increase population in the City of Los Angeles by approximately 693 persons, it will not jeopardize the region's attainment of air quality standards.¹¹ Specifically, the proposed project is consistent with the City of Los Angeles' General Plan, as well as population growth projections used by SCAG to identify future air quality emissions that must be mitigated through the 2012 AQMP.

As a result, the proposed project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

Consistency with City of Los Angeles General Plan Air Quality Element

The City's Air Quality Element relies on SCAQMD's guidance and requirements in this area to determine the significance of development on air quality. As such, they find that projects are significant if:

- Construction emissions exceed SCAQMD regional thresholds.
- Operational emissions exceed SCAQMD regional thresholds
- California 1-hour or 8-hour CO standards would be exceeded at an intersection or roadway within one-quarter mile of a sensitive receptor.

¹¹ Per CalEEMod 2013.2 forecast by DKA Planning 2013.

- The project would incrementally increase CO concentration by 1.0 ppm or greater for the California 1-hour standard or 0.45 ppm for the 8-hour CO standard.
- The project would create objectionable odors at nearby sensitive receptors.
- Toxic air contaminants would create significant adverse health effects

Based on the analysis, the project would not have significant impacts on local or regional air quality during construction or operations of the project. In addition, the Element identifies several policies that are relevant to the proposed project. Table 4.3-9, Project Consistency with City’s General Plan Air Quality Element, assesses the project’s consistency with the Air Quality Element.

Based on this assessment, the Project would be consistent with the City’s General Plan Air Quality Element and not contribute to an adverse cumulative impact on air quality.

**Table 4.3-9
Project Consistency with City’s General Plan Air Quality Element**

Policy	Analysis
Policy 1.3.1 Minimize particulate emissions from construction sites.	Consistent. Construction activities for this two-acre site will comply with SCAQMD Rule 403 that governs fugitive dust. Best management practices will be employed that reduce local exposure to PM ₁₀ and PM _{2.5} .
Policy 1.3.2 Minimize particulate emissions from unpaved roads and parking lots, which are associated with vehicular traffic.	Consistent. Any fugitive emissions of PM ₁₀ and PM _{2.5} during construction or operations of the Project would be regulated by SCAQMD Rule 403.
Policy 4.1.1 Coordinate with all appropriate regional agencies the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent The Project is a mixed-use, urban infill project that accommodates population growth in an area well serviced by public transit and local roadways. It also includes mixed-used commercial retail uses on the ground floor that supports livable communities initiatives.
Policy 4.2.2 Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.	Consistent The area is well served by local bus service provides by the City of Los Angeles’ DASH network and the Los Angeles County Metropolitan Transportation Authority. The project’s location serves to improve housing availability in the Downtown Los Angeles area.
Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel	Consistent The Project is an urban infill project that adds more housing and commercial retail in an area well served by

**Table 4.3-9
Project Consistency with City's General Plan Air Quality Element**

Policy	Analysis
vehicles.	public transit and local roadways. The project will provide both short and long term bicycle parking onsite and will limit curb cuts to secondary streets and alleys.
Policy 4.2.4 Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent The Project is being evaluated under CEQA for air quality impacts and complies with this policy.
Policy 5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Consistent The Project will comply with the State's CalGreen building standards. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
<i>Source: DKA Planning 2013. From Table 3-8 of Air Quality, Noise, and Greenhouse Gases Impact Report.</i>	

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact.

The Project, with the incorporation of the mitigation measures discussed above, would not result in on-site emission increases that exceed the LST thresholds set by the SCAQMD and would not contribute to localized violations of the CO, NO_x, PM₁₀, or PM_{2.5} standards. The Project also would not contribute to any substantial pollutant concentrations off-site from Project-related traffic for three key reasons. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which apply to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO impact.

As for exposure of sensitive receptors to toxic air contaminants (TACs), the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.¹² The Project is not anticipated to generate a substantial number of daily truck trips. Based on

¹² SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts are expected to be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would not include any of these potential sources. It is expected that the Project would not release substantial amounts of TACs, and no significant impact on human health would occur.

Localized air pollution impacts from incompatible land uses can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes. None of the uses near the Project Site are sources that would be incompatible with the proposed residential and retail commercial land uses.

In addition, the Project would not locate residential or other sensitive uses near existing sources of TACs in the Project area. Therefore, the Project would have a less than significant impact on exposure to TACs.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding.

The Project does not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). The Project would introduce new residences and ground floor retail to the area and would not result in activities that create objectionable odors. As a result, no significant odors impacts are expected from the Project.

4. BIOLOGICAL RESOURCES

- a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife¹³ (CDFW) or the U.S. Fish and Wildlife Service (USFWS).

The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building.

There is no landscaping on the Site. The sidewalk along 4th Street contains 2 mature trees in a small dirt plot adjacent to the curb. The sidewalk along Broadway contains 2 immature trees each individually contained in a small moveable sidewalk planter. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site; however street trees located in the public right-of-way will likely be removed for the project. Any potential impacts from the removal of street trees will be mitigated with the incorporation of Mitigation Measure 4-1, below.

No candidate, sensitive, or special status species are identified in local plans, policies, or regulations, or by the CDFW or the USFWS likely occurs on the Project Site. Therefore, impacts on sensitive or special status species are expected to be less than significant, with the incorporation of the mitigation measure below.

Mitigation Measures

4-1 Tree Removal (Public Right-of-Way)

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway, and on the site, on a 1:1 basis, shall be required for the unavoidable

¹³ Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: <http://www.dfg.ca.gov/about/namechange.html>

loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

- All trees in the public right-of-way shall be provided per the current Urban Forestry Division Standards.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation.

The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building.

There are no known natural communities identified in local or regional plans or policies or by the CDFW or USFWS on the Project Site or in the project vicinity. The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. Therefore, no impact to sensitive habitats will occur.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation.

The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building.

No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site.¹⁴ The nearest wetland (classified as riverine) is located at the Los Angeles River approximately 1.25 miles east of the Project Site.

¹⁴ U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Mapper*, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed June 12, 2013.

Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

- d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less than Significant Impact. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites.

The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building.

There is no native habitat on or adjacent to the Project Site and, due to the existing urban development, the Project Site does not function as a corridor for the movement of native or migratory animals. Additionally, no native wildlife nurseries are located in the project area. Therefore, impacts to migratory wildlife corridors or native wildlife nursery site are expected to be less than significant.

- e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

Potentially Significant Unless Mitigation Incorporated. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. The Project Site is located in an urbanized area of the City and is completely paved as a surface parking lot. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site; however street trees located in the public right-of-way will likely be removed for the project. Any potential impacts from the removal of street trees will be mitigated with the incorporation of Mitigation Measure 4-1, listed above.

- f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact. A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building. There is no landscaping on the Site. The sidewalk along 4th Street contains 2 mature trees in a small dirt plot adjacent to the curb. The sidewalk along Broadway contains 2 immature trees each individually contained in a small moveable sidewalk planter. The Project would not impact the sidewalk. There are no known locally designated natural communities on the Project Site or in the vicinity. Therefore, the Project will not conflict with the

provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

5. CULTURAL RESOURCES

The section is based in part on the following report and letter:

Historic Resource Assessment Report, Urbana Preservation & Planning, LLC, and Historic Consultants, Inc., Revised April 2014.

Sacred Lands File Search, Native American Heritage Commission, June 13, 2013.

- a) **Would the project cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?**

Potentially Significant Unless Mitigation Incorporated. *State CEQA Guidelines* Section 15064.5 defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

Regulatory Setting¹⁵

National Historic Preservation Act & Historic Properties

The National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of proposed federal undertakings on historic properties. A historic property is defined as any building, site, district, structure or object that is listed in or eligible for the National Register of Historic Places. In order for a property to qualify for the National Register of Historic Places it must meet one of the four National Register Criteria for Evaluation listed below by being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance. Pursuant to National Register Bulletin 15 the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

¹⁵ Pages 3-4. Historic Resources Assessment Report, Revised April 2014.

- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represents a significant and distinguishable entity whose components lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Two scenarios exist relative to the effects a potential undertaking may have on an historic property; 1) No historic properties affected, or 2) Historic properties are affected. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. A finding of no adverse effect may be issued if the proposed undertaking's effects do not meet the above-listed examples pursuant to 36 CFR part 800.5(a)(1), or if the undertaking is modified or conditions are imposed in order to avoid adverse effects.

CEQA & Historical Resources

CEQA Public Resources Code §21084.1 provides that any project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Public Resources Code §5020.1(q) defines "substantial adverse change" as demolition, destruction, relocation, or alteration such that the significance of the historical resource would be impaired. An historical resource is a resource that is listed in, or determined to be eligible for listing in the California Register of Historical Resources; included in a local register of historical resources; or is identified as significant in an historic resource survey if that survey meets the criteria specified in Public Resources Code §5024.1(g). A property may be eligible for listing on the California Register of Historical Resources if it is determined to meet one of the following criteria.

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

City of Los Angeles Historic-Cultural Monument (Local Register) Eligibility Criteria

Any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance may be designated as a Historic-Cultural Monument by the City of Los Angeles Cultural Heritage Commission if it meets at least one of the following criteria:

1. Historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or
2. Is identified with historic personages or with important events in the main currents of national, State or local history; or
3. Embodies the distinguishing characteristics of an architectural type, specimen, inherently valuable for a study of a period, style or method of construction; or
4. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman; or
5. Is a notable work of a master builder, designer or architect whose individual genius influenced his or her age.

Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource is materially impaired.

City of Los Angeles' "L.A. CEQA Thresholds Guide"

Pursuant to the City of Los Angeles CEQA Thresholds Guide, a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;

- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Project Impacts Per the City of Los Angeles CEQA Thresholds Guide

Evaluate conversion, rehabilitation, or alteration to a significant historical resource in terms of the extent of the work and the impact on the listing or eligibility of the resource. Also, determine whether the work meets the standards for rehabilitation established by the Secretary of the Interior and the OHP. Consider whether the conversion, rehabilitation, or alteration work would be compatible with the massing, size, scale, and architectural features of the resource. Projects more sensitive to historic integrity include minor repairs or temporary work that does not permanently affect significant elements and character. If new construction is proposed, give key consideration to compatibility with the massing, size, scale, and architectural features of the historical resource(s). Determine the impacts to the setting and character of the area as well as whether the new construction might indirectly reduce the viability of a district or grouping of historical resources.

Cumulative Impacts Per the City of Los Angeles CEQA Thresholds Guide

“Determine the impact of the related projects. Consider the cumulative impacts of the proposed and related projects to the population of resources which would remain, and to districts and groupings.”

Environmental Setting

National Register of Historic Places

The National Register of Historic Places (NRHP) lists many sites in downtown Los Angeles. The following are within 2 blocks of the Project Site:

- Angels Flight, at 4th Street and Hill, 2 blocks from the Project Site
- Bradbury Building, located at 216-224 W. 3rd Street, 1 block from the Project Site
- Million Dollar Theatre, located at 307 S. Broadway, 1 block from the Project Site
- Title Guarantee & Trust Company Building, located at 401-411 W. 5th Street, 2 blocks from the Project Site

The Project Site is located within the Broadway Theater and Commercial Historic District and adjacent to the Spring Street Financial Historic District. Both are listed on the National Register under Criterion A

and C. The Broadway Historic District has a period of significance of 1894-1931 in the areas of architecture, commerce, and entertainment/ recreation. The Spring Street Historic District has a period of significance of 1903-1931 in the areas of commerce and architecture.

California Historical Landmarks

The California Historical Landmarks (CHL) of the California State Parks, Office of Historic Preservation does not list any landmarks on or near the Project Site.¹⁶ The nearest CHLs are nearly 1 mile away across the 101 Freeway, clustered at the El Pueblo de Los Angeles Historic Monument:

- No. 144, Nuestra Señora La Reina De Los Angeles, located at 535 N. Main Street, approximately 4,150 feet from the Project Site.
- No. 145, Avila Adobe, located at the El Pueblo de Los Angeles Historic Monument, approximately 4,550 feet from the Project Site.
- No. 156, Los Angeles Plaza, located at the El Pueblo de Los Angeles Historic Monument, approximately 4,000 feet from the Project Site.
- No. 159, Pico House (Hotel), located at the El Pueblo de Los Angeles Historic Monument, approximately 4,000 feet from the Project Site.
- No. 301, Lugo Adobe (Site of), located at the El Pueblo de Los Angeles Historic Monument, approximately 4,500 feet from the Project Site.
- No. 730, Old Plaza Firehouse, located at the El Pueblo de Los Angeles Historic Monument, approximately 4,000 feet from the Project Site.

Los Angeles Historic Preservation Overlay Zones

Los Angeles has created 29 Historic Preservation Overlay Zones (HPOZs), commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties within designated districts.

There are no HPOZs on the Site¹⁷ or surrounding area. The nearest HPOZ is Angelino Heights, generally between Sunset Boulevard, the 101 Freeway, and north of the 110 Freeway.¹⁸

¹⁶California Historical Landmarks for Los Angeles County: http://ohp.parks.ca.gov/?page_id=21427

¹⁷ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 400 Broadway, website: <http://zimas.lacity.org/>.

Los Angeles Historic-Cultural Monument

The City of Los Angeles Cultural Heritage Ordinance, enacted in 1962, has made possible the designation of buildings and sites as individual local landmarks, called “Historic-Cultural Monuments” (HCMs) in Los Angeles. The City currently has over 1,000 Historic-Cultural Monuments, providing official recognition and protection for Los Angeles’ most significant and cherished historic resources.

The Central City Community Plan has many HCMs, especially along Broadway.¹⁹ The following are within 2 blocks of the Project Site:

- No. LA-4, Angels Flight, 4th Street and Hill, 2 blocks from the Project Site
- No. LA-6, Bradbury Building, 216-224 W. 3rd Street, 1 block from the Project Site
- No. LA-80, Palm Court (Alexandria Hotel), 210 W. 5th Street and 501-511 S. Spring Street, 2 blocks from the Project Site
- No. LA-177, Subway Terminal Building, 415-419 S. Hill Street, 1 block from the Project Site
- No. LA-271, Farmers and Merchants Bank Building, 401-411 S. Main Street, 2 blocks from the Project Site.
- No. LA-278, Title Guarantee & Trust Company Building, 401-411 W. 5th Street, 2 blocks from the Project Site
- No. LA-881, Judson Rives Building, 424. S Broadway, directly adjacent south of the Project Site
- No. LA-966, Douglas Building, 257 S. Spring Street, 2 blocks from the Project Site
- ZI-2081, Wilson Building, 431 S. Broadway, across Broadway from the Project Site
- ZI-2082, Broadway Mart Center, 401-423 S. Broadway within the Junipero Serra Building), across Broadway from the Project Site
- ZI-2086, Million Dollar Theatre, 307 S. Broadway, 1 block from the Project Site

¹⁸ Los Angeles HPOZs: <http://preservation.lacity.org/hpoz/la>

¹⁹ Los Angeles HCMs in Central City Community Plan: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result.cfm?community=Central%20City

Project Site History²⁰

Historic maps and records disclose the development history of the subject property and the surrounding block dates to the late 19th Century, with the earliest development patterns delineated in the 1894 (1900 update) Sanborn Fire Insurance Survey for Los Angeles. The 1894-1900 Sanborn Map shows the subject parcels (present-day 400 South Broadway) as being developed with the Los Angeles Chamber of Commerce Building, a three-story building plus basement owned and commissioned by George Mason. The building served as the Chamber's home for twelve years, from 1894 through 1906, and was later identified as the Mason Building and the H.D. Stack Building. In 1922 George Mason's heirs sold the property. Sanborn Maps disclose that by 1906 two floors had been added to the building. Ground floor storefronts and upper floor offices continued to characterize the property through the historic period, with the building's heat pumped in from the Angelus Hotel, an adjacent property located at the intersection of 4th and Spring Streets which had expanded to the third floor of a separately constructed building at 218-220 4th Street that shared a party wall with the Chamber of Commerce/Mason Building. By 1984 the old Chamber of Commerce/Mason Building has been entirely or substantially demolished with a single-story building in a One-Part Commercial Block form extant at the 400 South Broadway property. The single-story building featured a series of individual storefronts, and the building roof was utilized for surface parking. This single-story building with roof parking is extant today, and Los Angeles County Assessor records assign the property a 1984 year-built date.

Recognized Historical Resources in the Vicinity²¹

The Site is within the boundaries of the National Register listed Broadway Commercial and Theater Historic District. The Site is immediately adjacent to the National Register listed Spring Street Financial Historic District.

Broadway Theater and Commercial Historic District

The Broadway District is listed on the National Register under Criterion A and C at a local level of significance with a period of significance of 1894-1931 in the areas of architecture, commerce, and entertainment / recreation. The Broadway District was initially listed to the National Register in 1979. The nomination was updated in 2002 to reflect boundary changes. The 400-422 422 South Broadway property is identified as a non-contributing building in the 2002 National Register nomination.²² As a property listed on the National Register of Historic Places, the Broadway District is automatically listed on the California Register of Historical Resources, and qualifies as an historical resource under CEQA.

²⁰ Pages 5 and 8. *Historic Resources Assessment Report, Revised April 2014. Included in the Appendices.*

²¹ Pages 13-16. *Historic Resources Assessment Report, Revised April 2014. Included in the Appendices.*

²² *National Register of Historic Places Nomination – Broadway Theater and Commercial District (Boundary Increase), Additional Documentation - Page 1, Listed April 12, 2002.*

The Broadway District includes a mix of historic-era office buildings, theaters, and department stores constructed between 1894 and 1931, with most contributing properties designed and built up to twelve stories in a classical aesthetic, including the Beaux Arts style. The National Register nomination describes the district as featuring ‘even street walls’ broken by occasional surface parking lots “with commercial buildings typically exhibiting a division of street-facing elevations into three horizontal zones based on the parts of a column in Classical architecture.” Additional features that characterize the district include:

- Conformance of all buildings to a common setback abutting the sidewalk,
- Common use of materials and exterior wall finishes including glazed terra cotta, glazed brick, and cast stone, and
- Use of street-level storefronts at most buildings.²³

Spring Street Financial Historic District

The Spring Street District is listed on the National Register under Criterion A and C at a local level of significance with a period of significance of 1903-1931 in the areas of commerce and architecture. The district was initially listed to the National Register in 1979. The nomination was updated in 2000 to reflect boundary changes. The Site is not located within the original or revised boundaries of the National Register Spring Street District, however it is located directly adjacent to the District and the proposed Project would be visible from locations within the District. As a property listed on the National Register of Historic Places, the Spring Street District is automatically listed on the California Register of Historical Resources, and qualifies as an historical resource under CEQA.

The Spring Street District abuts the alley, identified as Frank Court, at the east side of the Site. Immediately adjacent to the alley within the district boundaries, is an asphalt surface parking lot identified as 403 S. Spring Street and the Title Insurance Building, a Historic District contributor originally constructed in 1928 as a 10-story office building of concrete with a terra cotta and brick façade in an Art Deco style. Overall the Spring Street District is regarded as “somewhat homogenous in both style and function” and is characterized by dense lot development with many of its buildings amounting to 12 and 13 stories in height. Architectural styles include Classical Revival and Moderne over a mix of vertical blocks (two-part, three-part, and stacked). According to the National Register nomination “most ornamentation was kept to a minimum and the more flamboyant styles of the 1920s and 30s did not gain favor...buildings were kept to a somewhat uniform appearance in scale...the visual appearance of the

²³ *Ibid.*, Continuation Sheet - Section 7 Page 1.

district no doubt played an important role in convincing the public that this was indeed the center of financial strength on the west coast.”²⁴

Proposed Project²⁵

Massing for the property would include the building envelope developed to the sidewalk (at both street-facing elevations) through the sixth floor with a seventh floor terrace along the east and south sides of the building, that would continue to the roof offering a somewhat tri-partite composition typically found in classical mid-rise and skyscraper construction (base, shaft, capital). At the Broadway elevation the building base would be vertically divided into three bays in order to emulate the appearance of three separate but adjacent buildings and effectively break up the continuous 240’ façade length. The central bay would project out from the wall plan to extend approximately 5’ over the sidewalk, beginning at a height of 42’-6” above sidewalk grade. The cornice would also be of greater height at this central bay to further articulate the façade and break up the wall plane. Exterior materials and finishes, as well as fenestration, would further reinforce the classical division of the building as follows:

- Lower Base (ground floor retail)
 - Use of a granite bulkhead, full-height storefront windows, awnings, solid and perforated metal panels to screen parking, clear and frosted glass, and black window mullions and transom panels; with terra cotta walls in a white ice color from the ground floor through the fourth floor, and a white metal spandrel panels between the third and fourth floors that are somewhat reminiscent of belt coursing at historic-era buildings.
- Upper Base (floors 5-10)
 - Use of horizontally aligned windows with clear glass and terra cotta walls at floors five through nine in a bisque color, with the 10th floor articulated by terra cotta walls in a white ice color and a pronounced corbelled and bracketed cornice which would establish a strong horizontal division where the building steps back to the 11th floor terrace/amenity deck, resulting in an overall scale and building height comparable to adjacent and nearby historic-era buildings.
- Setback – Between 10th and 11th Floors
- Shaft (floors 11-33)

²⁴ National Register of Historic Places Nomination – Spring Street Financial District – Continuation Sheet Page 1, Listed August 10, 1979.

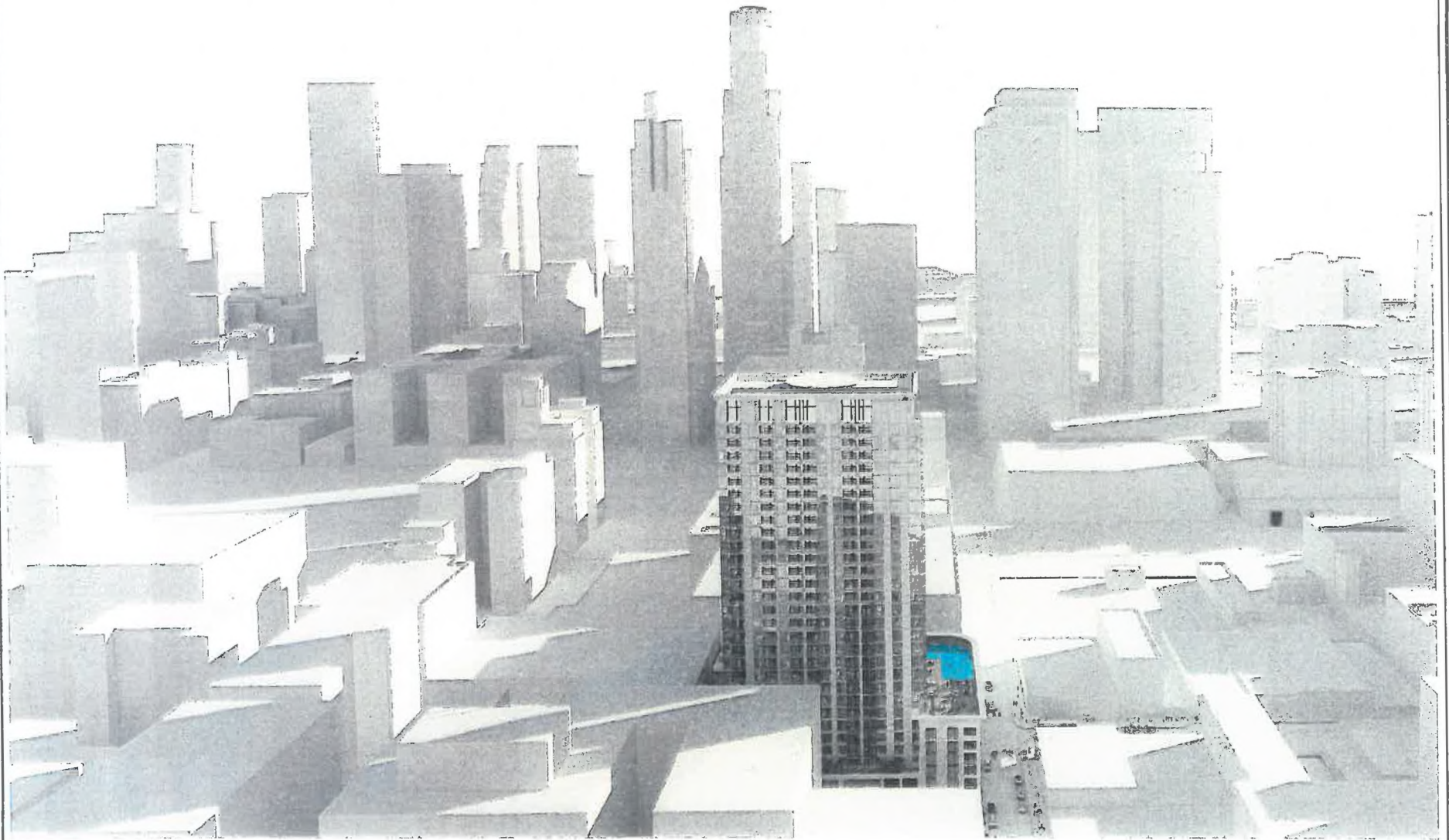
²⁵ Pages 17 and 18. *Historic Resources Assessment Report*, Revised April 2014. Included in the Appendices.

- Use of vertically and horizontally aligned windows and balconies with typical glass at windows, grey glass at transoms, and frosted glass at balconies; a mix of white and black window mullions, and cementitious panels at exterior walls in a white color.
- Capital (floor 34 – penthouse)
 - Further setback from the established wall plane and a change in fenestration dimensions to include full-height (18') window walls in a darker glass with additional cementitious panels in a white ice color capped by a flat roof with a corbelled and bracketed cornice.

The proposed cornice design at the building base / podium includes a corbelled cornice with brackets that are larger in size and similar to what is found in historic-era buildings in the surrounding historic districts. The projecting cornice continues along the Broadway elevation and increases in height at the middle portion of the facade. The proposed cornice design for the top of the residential tower is similarly corbelled with brackets.

The proposed building would abut the adjacent historically designated Judson Rives Building at 424 South Broadway, and would be built out to the existing alley accessible from 4th Street. The proposed building base would be approximately 113' in height as compared to the 130' (approximate) Judson Rives Building.

See Figures 4.5-1 and 4.5-2 for renderings of the Project. See Figures 4.5-3 through 4.5-12 for a map and view simulations intended to demonstrate how the Project will interact with the two historic districts (Broadway and Spring Street), in particular to identify how the building will be viewed from the pedestrian / street level within the two historic districts as a method of assessing visual impacts.



Source: HansonLA Architects, April 2014.



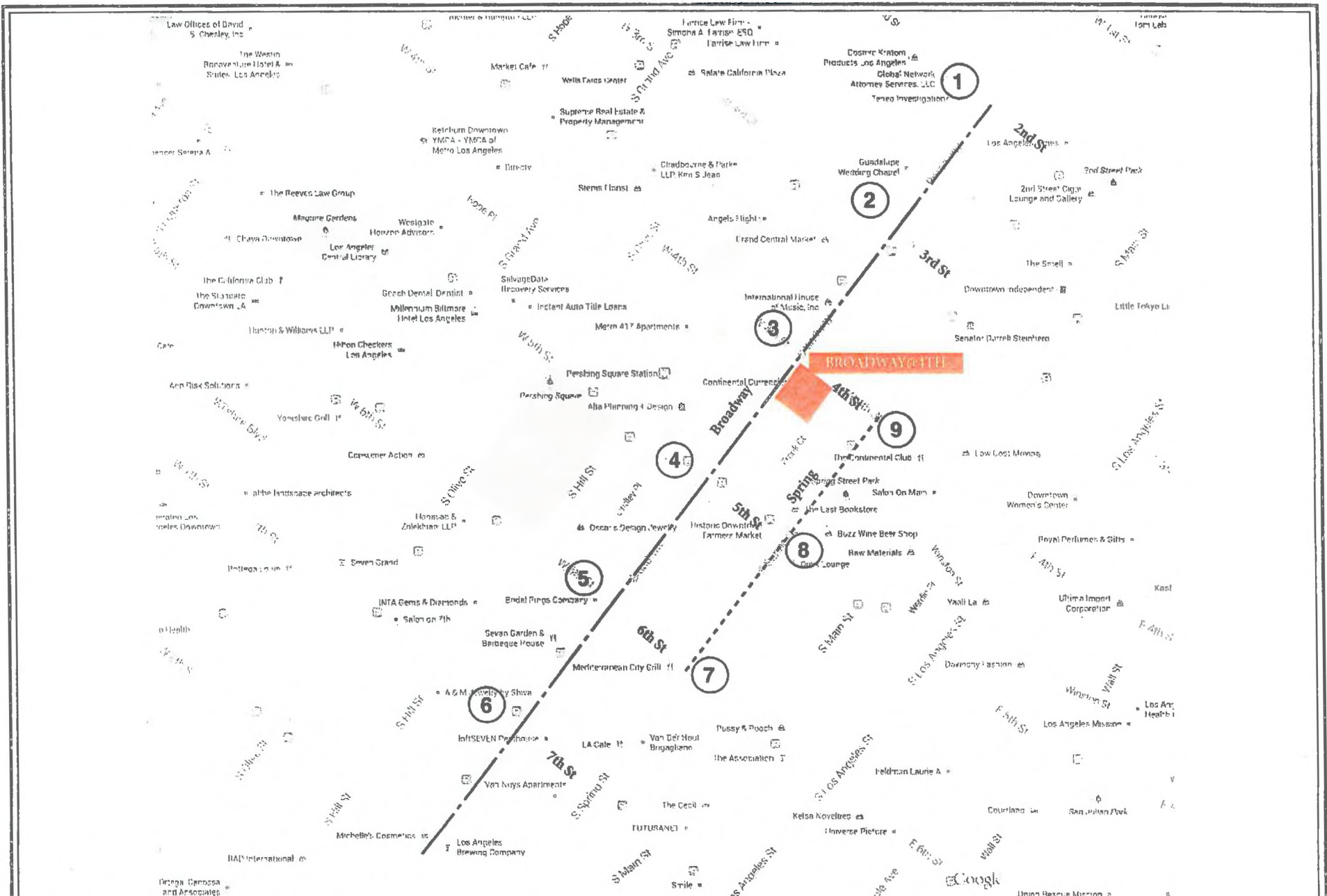
Figure 4.5-1
Rendering, View of the Project with Downtown Los Angeles Skyscrapers Visible



Source: HansonLA Architects, April 2014.

 CAJA Environmental Services, LLC

Figure 4.5-2
Rendering, View of the Corner of 4th Street and Broadway



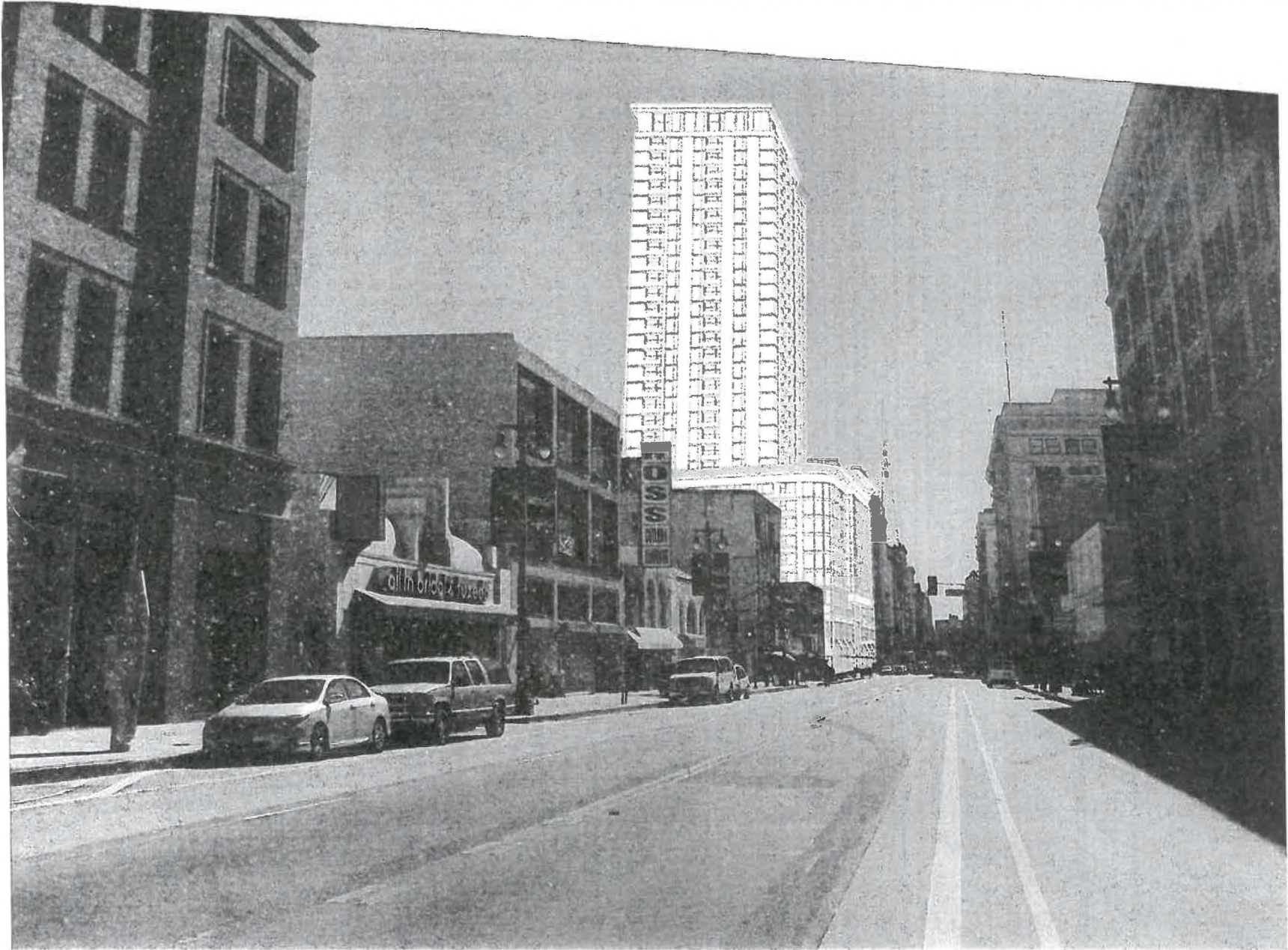
Source: HansonLA Architects, April 2014.



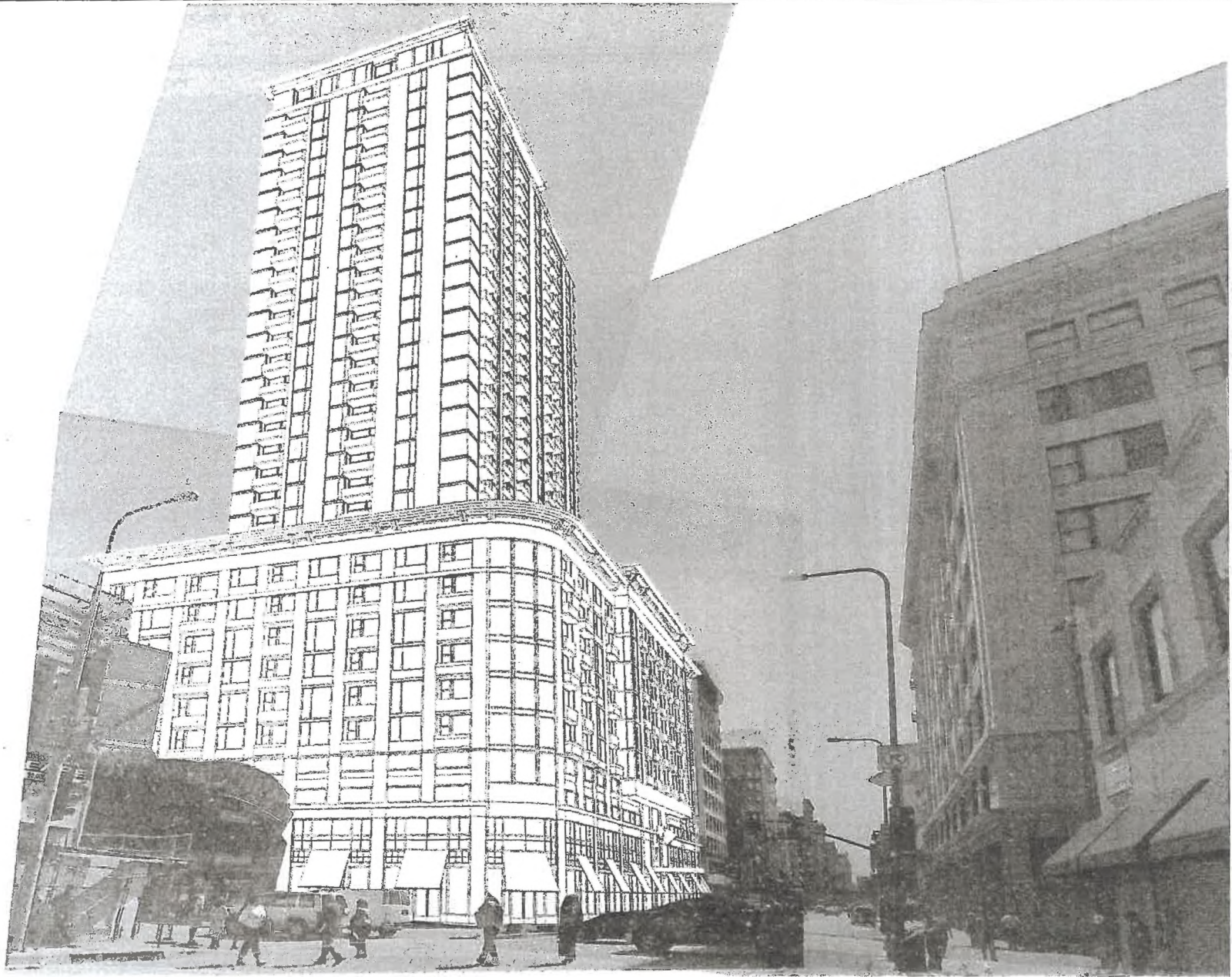
Source: HansonLA Architects, April 2014.

 CAJA Environmental Services, LLC

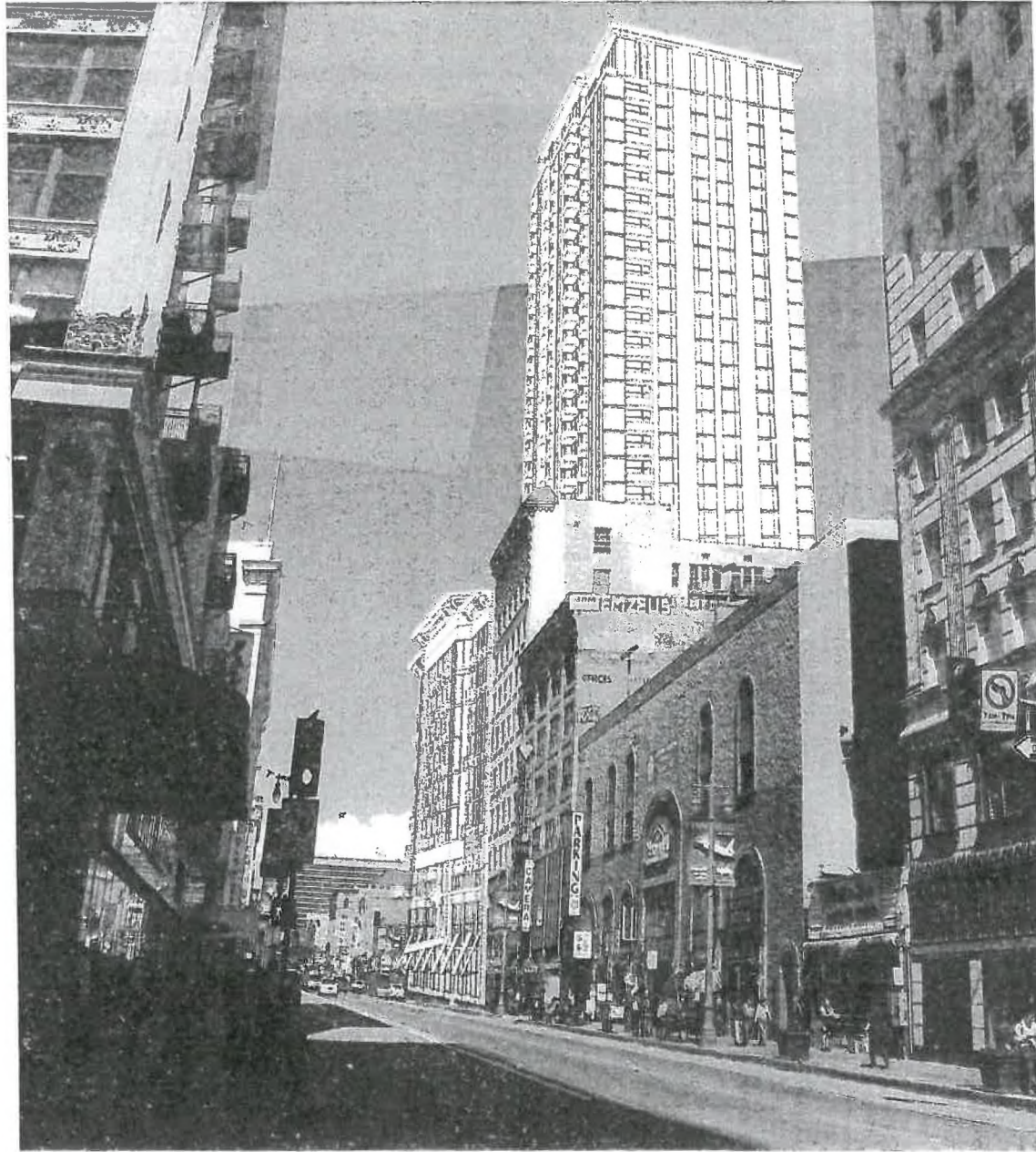
Figure 4.5-4
Simulated View 1
View south from intersection of 2nd Street and Broadway



Source: HansonLA Architects, April 2014.



Source: HansonLA Architects, April 2014.



Source: HansonLA Architects, April 2014.



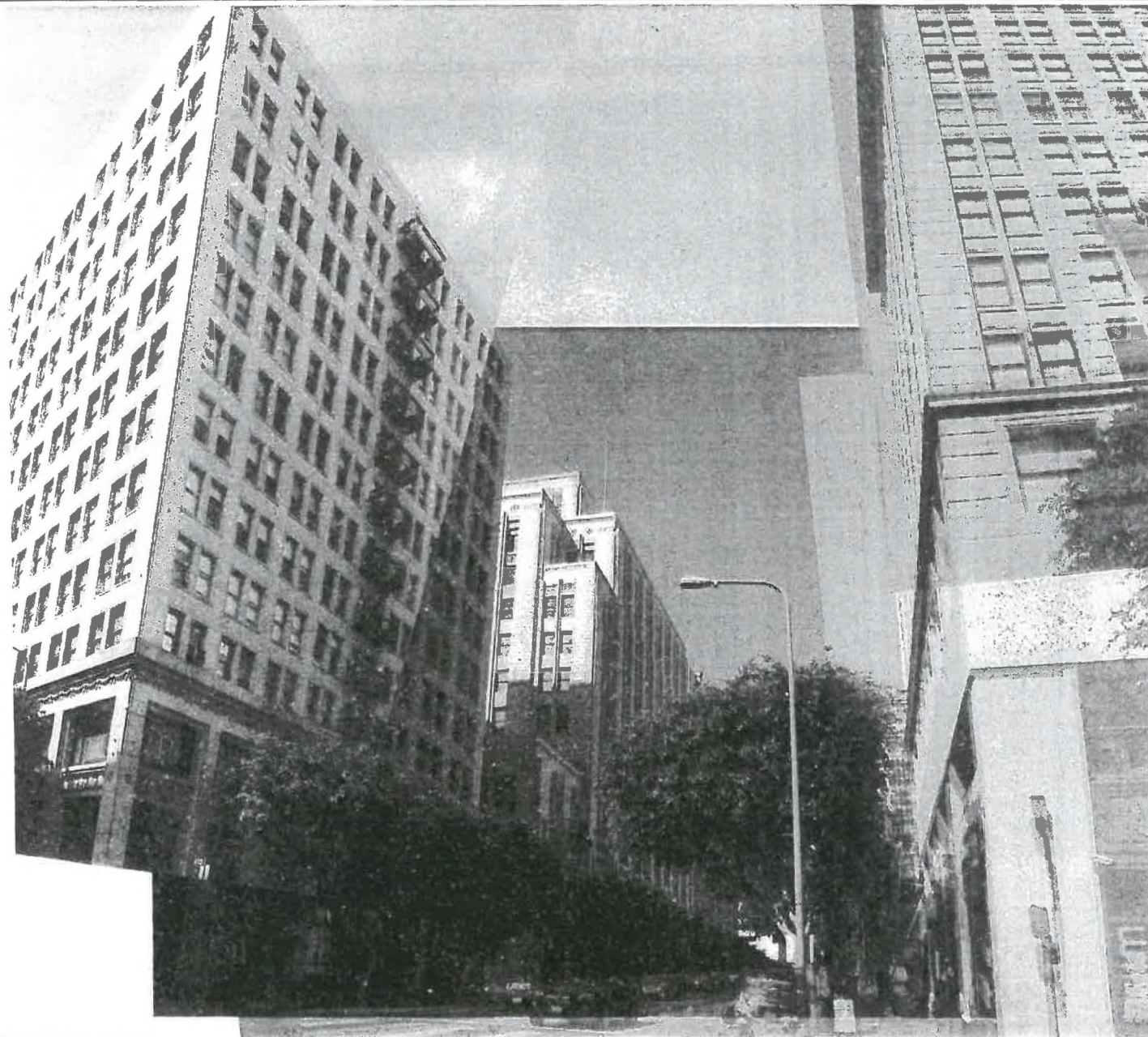
Source: HansonLA Architects, April 2014.



Source: HansonLA Architects, April 2014.



Source: HansonLA Architects, April 2014.



Source: HansonLA Architects, April 2014.



Source: HansonLA Architects, April 2014.

Design Review Analysis

*The Secretary of the Interior Standards for Rehabilitation*²⁶

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Secretary of the Interior's Standards for Rehabilitation provide the highest level of flexibility for alterations, reuse or adaptive reuse, and new construction at or in close proximity to a historic property. Following are the ten rehabilitation standards by which proposed projects are analyzed for the purposes of design review and CEQA analysis.

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

The Project represents a continuation of use at the subject parcels with ground floor commercial-retail, and expands the existing use to include residential units at the upper floors of the proposed building. Historically, the property was developed with a three and then five story building that featured ground floor commercial-retail with office units at the upper floor, however both commercial-retail and residential are uses commonly found in the historic districts.

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

The existing building is non-historic and ineligible. It is not a contributing element to the Broadway District, nor is it located within the boundaries of the Spring Street District. The Project will not result in the removal or alteration of any extant materials, features, spaces, or spatial relationships that characterize the property today, nor will it remove or alter any features, spaces or relationships that characterize either district. A contemporary-period painted wall advertisement is extant at the adjacent historically designated Judson Rives Building at 224 S. Broadway. The mural is non-historic. Construction of the Project would obstruct view of the mural location. Because the mural is non-historic, the Project has not been considered as affecting a historic mural or views of a historic mural.

3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

No changes are proposed to an existing historically or architecturally significant building, and similarly, the Project design has not been represented as a reconstruction of an historic building or replicating the

²⁶ Pages 38-41. *Historic Resources Assessment Report, Revised April 2014. Included in the Appendices.*

features or historic elements from surrounding significant buildings within the Broadway District or the adjacent Spring Street District. Construction of the Project would not give a false sense of historical development for the Broadway District or the adjacent Spring Street District.

The Project design offers a tri-partite composition with a building base of 11-stories that is lower than, but comparable to, the height of the neighboring historically designated Judson Rives Building. A metal cornice articulates this 10-story base with projections (similar to brackets) evenly spaced along the street facing elevations, including the pop-out bay fronting Broadway and adjacent to the Judson Rives Building. The cornice can be viewed as reminiscent of historic-era revival style cornices found on buildings throughout the historic district, but with an updated material the cornice treatment is clearly distinguishable as a new complementary feature rather than conjectural feature.

The proposed building would feature a granite bulkhead and terra cotta exterior walls in white ice and bisque colors at its 10-story base. The terra cotta material is a system of interlocking panels. Joints are created by slightly recessed connection points, which create an appearance of blocks or bricks. No mortar will be used for the interlocking system. Additional base materials include white metal panels for spandrel locations, solid and perforated metal panels at parking floors, and clear glass at full-height storefront windows. In its entirety the proposed building would not create a false sense of historical development in downtown Los Angeles, nor would it be a conjectural addition to the Broadway District. Through its similarly scaled podium with ground floor storefronts, terra cotta walls, and cornice treatment, the proposed design incorporates features basic to surrounding historic buildings, while still establishing the identity of new construction through the use of modern materials, and the residential tower setback from the building base.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

The existing building is non-historic and ineligible, therefore it does not contain changes that have acquired historic significance. The Project would be built on a non-contributing parcel within the boundaries of the National Register listed Broadway District. The significance of the historic district would be preserved and unchanged as part of the Project / Project design with the incorporation of Mitigation Measures 1-1 and 1-2. No material changes would occur to contributors in the district as part of the Project. The Project design addresses visual considerations relative to historic contributors by maintaining a building base with massing that is similar to the surrounding district contributors, including the adjacent Judson Rives Building, including storefronts in a traditional arrangement and design, and setting back the proposed residential tower (11th through 34th floors) such that it would not adversely affect street level views along the historic Broadway and 4th Street corridors or along the S. Spring Street corridor within the adjacent Spring Street District.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The distinctive materials, features, finishes, and construction techniques of the Broadway District would remain as part of the Project. The existing building is non-historic and ineligible. It is not a contributing element to the Broadway District. The existing building that is intended for demolition does not feature distinctive materials, features, finishes, or construction techniques, and it is not considered to be an example of important craftsmanship. The proposed new construction, at the building base, will include features and materials that are complementary to the historic district including a granite bulkhead at the 4th Street and Broadway elevations, terra cotta exterior wall surfaces in a brick or block pattern, and a decorative cornice. The proposed residential tower atop the building base offers a more contemporary appearance that, because of the tower's setback from the base and the surrounding historic wall plans, is minimized.

6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

The existing building is non-historic and ineligible. It is not a contributing element within the Broadway District and it is not located within the boundaries of the adjacent Spring Street District. The existing building that is intended for demolition does not contain or exhibit historic features that would require or warrant retention and repair. Relative to the surrounding and adjacent historic districts, the Project design as mitigated does feature massing, building height, storefront configurations, and wall colors and textures at the 10-story building base, that are complementary to the features identified at historic district contributors. The residential tower comprising the 11th through 34th floors will be new construction in a contemporary aesthetic, however, the residential tower will be setback from the building base on the Broadway and Fourth Street facades by a minimum of 30 feet, which should help to reduce visual intrusion the building may have at the sidewalk / pedestrian level in the surrounding Broadway District or the adjacent Spring Street District. The Broadway CDO and Ordinance 180,871 require that the footprint of portions of buildings above 150 feet cover no less than 30 percent and no more than 40 percent of the total lot area. As towers are not representative of either the Broadway Historic District or the Spring Street District, it is necessary to reduce the massing of the tower element to minimize the impacts to both districts. The incorporation of **Mitigation Measures 1-1** and **1-2**, discussed above in Section 1.c, will further reduce the bulk and massing of the tower by minimizing the projection of balconies and further reducing the tower's lot coverage.

7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

No chemical treatments have been proposed relative to an existing historic building in the vicinity of the Project. The adjacent Judson Rives Building would abut the new construction at the subject parcels. Measures to ensure protection of the Judson Rives Building may include appropriate screening and

stabilization as required by the City of Los Angeles and construction and engineering professionals, as well as the requirements of **Mitigation Measure 12-6**.

8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

It is recommended that this Standard No. 8 be considered with respect to the on-site identification and subsequent treatment and monitoring of subsurface cultural resources (see **Mitigation Measure 5-1**).

9. *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

Construction of the Project would not destroy historic materials or features of a historic property; however mitigation is necessary to ensure the Project does not materially impair the integrity or significance of the Broadway Historic District that the Site is located within or the Spring Street District, located adjacent to the Project Site. The proposed building is located on a non-contributing parcel within the Broadway District, but for the purposes of this analysis and Rehabilitation Standard No. 9, the Project may be regarded as an addition to the historic Broadway District – the greater historic property under *The Standards for Rehabilitation* and the historical resource under consideration as part of this review.

The vertical treatment of the proposed building in a classical tri-partite composition would be consistent with the development patterns and characteristics of many of the historic buildings in the Broadway District. The proposed design features a setback at the 11th floor to ensure compatibility of street wall scale and pedestrian experience with surrounding historic buildings. Additionally the West /Broadway elevation is further articulated by a pop-out façade that creates three vertical facades or bays to emulate the appearance of three separate buildings and break up the elevation's continuous 240' span. **Mitigation 1-1** requires that balconies on the podium levels not project from the façade of the building. Buildings within the Broadway Historic District have not historically included balconies. There are a few examples of recent conversions from fire escapes to balconies on historic buildings, however these are limited. The converted balconies are most often not on the primary façade and they retain the look of the fire escape without dominating the building façade or altering the architectural style of the building. The project design incorporates glazing and color to establish appropriately scaled horizontal division at the building base, which would appear to result in additional compatibility with the surrounding historic district, while still creating a different and distinguishable appearance. The tower is required to be setback a minimum of 30 feet from Broadway and from 4th Street per Ordinance 180,871, which maintains a consistent street wall, however at 34 stories the tower would still be highly visible from the Broadway Historic District and from portions of the Spring Street Historic District. At present the closest high-rises to the Project Site are located several blocks away in Bunker Hill. In order to further reduce the massing of the tower element and any potential impacts it may have on the historic districts, **Mitigation Measure 1-1** requires the projection of balconies be minimized and **Mitigation 1-2** requires the lot coverage of the tower be

reduced. With incorporation of these mitigation measures, the new building will be massed appropriately to continue the feel of the district at the street level while providing for increased density at the setback residential tower.

Simulated views of the Project within the Broadway District (between 2nd and 8th Streets) and the adjacent Spring Street District (between 4th and 6th Streets) show how the proposed building will relate to nearby historic-era district contributors and non-contributors are included as Figures 4.5-4 through 4.5-12. As illustrated in the simulated views, the Project will continue the established visual perspective and sight lines from the sidewalk and street level of the two historic districts. The building base / podium continues the sight line of cornice treatments found on surrounding historic buildings at the Broadway District. The residential tower is setback from the sidewalk wall plane at Broadway, which helps to lessen impacts of having a residential tower that extends approximately 20-stories above the average 13-story historic building within the boundaries of the district. Potential impacts of the tower will be further reduced with the incorporation of **Mitigation Measures 1-1** and **1-2**. Based on the simulated views and mitigation measures, the proposed building would not destroy or alter the historic materials, features, or spatial relationships that characterize the Broadway District.

The proposed building would not be visible from the sidewalk / street level of the Spring Street District when viewed from intersections of 6th Street and South Spring Street and 5th Street and South Spring Street. Views of the district are completely unchanged from these locations. The proposed building would be visible from the intersection of 4th Street and South Spring Street at the northern vicinity of the Spring Street District, however, it is important to note the presence of two non-contributing asphalt surface parking lots at the 4th Street and South Spring Street intersection, one at the northwest corner and one at the southwest corner, which open up views to the Project Site at 4th Street and South Broadway. It is assumed that the presence of the proposed building would be less apparent if the two parking lots were improved with buildings or structures. Based on the simulated views and mitigation measures, the proposed building would not destroy or alter the historic materials, features, or spatial relationships that characterize the Spring Street District. As simulated, the Project would only be visible from a small portion of the Spring Street District.

As mitigated, the Project appears to be generally compatible with the buildings within the two historic districts while still being clearly distinguishable from the district contributors.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The Project is situated on a parcel that is identified as non-contributing to the Broadway Commercial District and is outside the boundaries of the adjacent Spring Street District. The proposed building could hypothetically be removed entirely without affecting or impairing the essential form or integrity of the Broadway District or the Spring Street District.

Broadway Theater and Entertainment District Design Guide

The Project would be consistent with the Broadway Design Guide, as described in Section 10, Land Use and Planning, of this IS/MND. See Table 4.10-5, Broadway Theater and Entertainment District Design Guide, for a discussion of the Project's compliance.

Historical Resources Conclusion²⁷

The Project is a non-contributing parcel within the boundaries of the Broadway Historic District and the Community Design Overlay zone. The historic district is listed on the National Register of Historic Places and California Register of Historical Resources, and meets the definition of an historical resource pursuant to CEQA. The Broadway District has been defined as the historical resource of concern. The Spring Street District, located adjacent to the Project location, is listed on the National Register of Historic Places and is also considered a historical resource, however, because the Project is not located within the boundaries of the district.

The Project, as mitigated, would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. Substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. The Project is located on a non-contributing parcel within the boundaries of the Broadway Commercial and Theater Historic District and is adjacent to the northwest corner (but outside the boundaries) of the Spring Street Financial Historic District, both of which are listed on the National Register of Historic Places. The Project would not demolish, destroy, or relocate any elements of either the Broadway District or the Spring Street District. Additionally, the incorporation of Mitigation Measures 1-1 and 1-2 will further reduce potential impacts of the Project so as to maintain the integrity and significance of both the Broadway Historic District and the Spring Street Historic District.

Simulated views of the Project from several locations within each historic district reveal that the proposed building would not alter the visual qualities or immediate setting of either historic district. Excepting the intersection of 4th and S. Spring Street the proposed building, as simulated, would not be visible from the sidewalk / street level of the majority of the Spring Street District. As simulated, the proposed building would maintain continuity with the surrounding historic-era buildings by incorporating similar materials (terra cotta at all exterior facades of the building base), similar design features (ground floor retail with traditional storefront display windows, projecting terra cotta cornices with corbels and brackets similar to what is observed at surrounding historic buildings), and at the base / podium a massing and height similar to surrounding historic-era buildings prior to setting back at the 11th floor to continue with the residential tower for 23-stories.

²⁷ Pages 47-48. *Historic Resources Assessment Report, Revised April 2014. Included in the Appendices.*

The height of the residential tower, which comprises floors 11-34 of the proposed building, is mitigated through a setback at the 10th floor roofline, which has been articulated by a terra cotta cornice that wraps the two-street facing elevations and helps to connect the proposed building with the character and visual qualities of the nearby historic district contributors. The massing of the tower is mitigated by Mitigation Measure 1-2. The integrity of both historic districts would remain intact subsequent to completion of the proposed project, and both historic districts will continue to be listed on the National Register of Historic Places and the California Register of Historical Resources. As mitigated, the Project would not cause a substantial adverse change in the significance of either historic district, and as such would not cause a substantial adverse change in the significance of a historical resource. The Project, with the incorporation of Mitigation Measures 1-1 and 1-2, would not materially or visually impair or reduce the integrity of the Broadway District such that it could lose its National Register of Historic Places or California Register of Historical Resources listing. The view of the district as the greater historical resource would remain essentially unchanged from the pedestrian / sidewalk level. The Broadway District will still meet the definition of an historical resource after the Project is completed.

The Project would not materially or visually impair any of the individual contributors / historical resources within the Broadway District, including the adjacent Judson Rives Building. The view of the Judson Rives Building as an individual historical resource would remain unchanged from the pedestrian / sidewalk level within the district, excepting view of the building's exposed side wall which is currently painted with a non-historic wall advertisement. All individual contributors, including the adjacent Judson Rives Building, will remain intact and will retain individual historical resource status.

As mitigated, the Project conforms to *The Secretary of the Interior's Standards for Rehabilitation* and the City of Los Angeles *Broadway Theater and Entertainment District Design Guidelines*. The Project design has been determined consistent with the historic development patterns of the area while still maximizing land uses at the site, and would result in an enhancement at the street level aesthetics and pedestrian feel of the historic district. The proposed building massing helps to achieve this conclusion, as the building is designed with a 10 story base built out to the sidewalk with a residential tower comprising the 11th through 34th floors that is setback from the base wall by more than 30 feet. The tower's setbacks, reduction in massing and minimized balcony projections are essential to maintaining historic building and street corridor views from the sidewalk level. The Project would not result in a significant impact or substantial adverse change to the Broadway Historic District under Public Resources Code §5020.1(q). Therefore, with the incorporation of Mitigation Measures 1-1 and 1-2, listed above, impacts to the historical resources as a result of the Project are anticipated to be less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?

Potentially Significant Unless Mitigation Incorporated. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-

related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities, since at least 1888, and developed with the current structure in 1985.²⁸ The Project would require excavation for the subterranean parking as well as for utility and foundation work. Although the Project Site is currently developed, there is still the potential for buried archaeological resources within the Project Site. However, with the implementation of **Mitigation Measure 5-1**, impacts on archaeological resources would be less than significant.

Mitigation Measure

5-1 Cultural Resources (Archaeology)

- If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the areas of archaeological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent archaeological resources), and:
 - a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Register of Professional Archaeologists (ROPA) or a ROPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - b. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - c. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology, McCarthy Hall 477 CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834

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

²⁸ *Phase I Environmental Site Assessment, Partner, February 5, 2013, page ii.*

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

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities, since at least 1888, and developed with the current structure in 1985.²⁹ The Project would require excavation for the subterranean parking as well as for utility and foundation work. Although the Project Site is currently developed, there is still the potential for buried paleontological resources within the Project Site. However, with the implementation of **Mitigation Measure 5-2**, impacts on paleontological resources will be less than significant.

Mitigation Measure

5-2 Cultural Resources (Paleontology)

- If any paleontological materials are encountered during the course of project development, all further development activities shall halt in the areas of paleontological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent paleontological resources), and:
 - a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - b. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
 - d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

²⁹ *Phase I Environmental Site Assessment, Partner, February 5, 2013, page ii.*

- e. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations
- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site is located in an urbanized area and has been previously disturbed by past development activities, since at least 1928.³⁰ The Project would require excavation for the subterranean parking as well as for utility and foundation work. The Native American Heritage Commission (NAHC) was contacted on June 12 2013 to conduct a Sacred Lands File (SLF) Search, of which a response was received on June 13, 2013. A record search of the NAHC Sacred Lands File failed to indicate the presence of Native American traditional cultural place(s) in the Project Site, based on the USGS coordinates, the Area of Potential Effect (APE). The area is known to the NAHC and the local Salinan to be very culturally sensitive. Note that the NAHC SLF Inventory is not exhaustive; therefore, the absence of archaeological or Native American sacred places does not preclude their existence. Environmental impacts may result from project implementation due to discovery of unrecorded human remains. With the implementation of **Mitigation Measure 5-3**, impacts on human remains will be less than significant.

Mitigation Measure

5-3 Cultural Resources (Human Remains)

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
 - a. Stop immediately and contact the County Coroner:
1104 N. Mission Road, Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

³⁰ *Phase I Environmental Site Assessment, Partner, February 5, 2013, page 7.*

- b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
- c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;
- f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

6. GEOLOGY AND SOILS

The section is based in part on the following documents:

Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 400 South Broadway, Los Angeles, California, Geotechnologies, Inc, September 4, 2013.

Soils Report Correction Letter, City of Los Angeles Department of Building and Safety, October 3, 2013.

Addendum I – Additional Exploration and Response to City Review Letter, Geotechnologies, Inc, November 18, 2013.

Addendum II – Additional Geotechnical Comments, Geotechnologies, Inc, December 16, 2013.

Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, December 17, 2013.

- a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- (i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. The criteria for these major groups are based on criteria developed by the California Geologic Survey (CGS) (formerly California Division of Mines and Geology) for the Alquist-Priolo Earthquake Fault Zoning Program. By definition, an active fault is one that shows evidence of surface displacement within Holocene time (about the last 11,000 years). A potentially active fault is one that has demonstrated surface displacement within the Quaternary age deposits (about the last 1.6 million years). Inactive faults show no signs of surface displacement within the last 1.6 million years.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they provide an earthquake.

The Project Site is located approximately 1.49 kilometers (0.93 miles) from the nearest fault, the Puente Hills Blind Thrust Fault.³¹ No known active or potential active faults underlie the Project Site. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low.³²

The City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the Project will be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Therefore, impacts related to ground rupture from known earthquake faults will be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within a seismically active region. As such, development of the Project would expose future residents, employees, and visitors at the Project Site to seismic ground shaking. However, the design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code (CBC) and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current CBC and LAMC requirements would minimize the potential to expose people or structures to substantial risk of loss or injury. As such, impacts related to seismic ground shaking would be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. ZIMAS³³ and the Safety Element of the City of Los Angeles³⁴ do not classify the Project Site as within an area susceptible to liquefaction.

According to GeoTracker, the depth of groundwater in the vicinity of the Site is inferred to be present at

³¹ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 400 Broadway, website: <http://zimas.lacity.org/>.

³² *Preliminary Geotechnical Engineering Investigation*, Geotechnologies, September 4, 2013, page 6.

³³ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 400 Broadway, website: <http://zimas.lacity.org/>.

³⁴ *Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles*: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed June 12, 2013.

approximately 86 feet below ground surface (bgs).³⁵ The Preliminary Geotechnical Engineering Investigation by Geotechnologies, dated September 4, 2013, stated that groundwater was not encountered during exploration, which was excavated to a maximum depth of 120 feet below the existing site grade. The report further states that a review of the California Geological Survey Seismic Hazard Zone Report of the Los Angeles Quadrangle shows the historically highest groundwater level at the site is on the order of 45 feet below the existing site grade. Addendum I to this report, dated November 18, 2013, states that minor water seepage was encountered at a depth of 50 feet below the existing site grade, but groundwater was not encountered in the remainder of the borings.

The State of California Seismic Hazards Map does not classify the Site as part of the potentially “Liquefiable” area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. Based on the dense nature of the underlying soils, the depth to underlying bedrock, and the depth to historic highest groundwater level, the potential for liquefaction occurring at the Site is considered to be remote.³⁶

Therefore, no impacts with respect to liquefaction will be less than significant.

(iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. The Project Site is flat and free from the potential of landslide as it is not located adjacent to any mountains or steep slopes. ZIMAS³⁷ and the Safety Element of the City of Los Angeles³⁸ do not classify the Project Site as within an area susceptible to landslides. The probability of seismically-induced landslides occurring on the Site is considered to be low due to the general lack of elevation difference slope geometry across or adjacent to the Site.³⁹ Further, according to the State of California Seismic Hazards Map, the Project Site is not at risk

³⁵ *Phase I Environmental Site Assessment, Partner, February 5, 2013, page 5.*

³⁶ *Preliminary Geotechnical Engineering Investigation, Geotechnologies, September 4, 2013, page 7.*

³⁷ *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 400 Broadway, website: <http://zimas.lacity.org/>.*

³⁸ *Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, accessed June 12, 2013.*

³⁹ *Preliminary Geotechnical Engineering Investigation, Geotechnologies, September 4, 2013, page 8.*

for earthquake-induced landslides.⁴⁰ Therefore, no impacts with respect to landslides will occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. During construction, grading and excavation would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion will not occur.

Excavation will be limited to that necessary for the installation of building foundations, utilities, and the subterranean parking levels. All grading activities require grading permits from the City of Los Angeles Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills.

The area surrounding the Project Site is completely developed and will not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, the Project will be required to prevent the transport of sediments from the site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Impacts may result from the alteration of natural landforms due to extensive grading activities. However, this impact will be mitigated to a less than significant level by designing the grading plan to conform with the requirements of Chapter IX, Division 70 of the LAMC, as well as the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. All grading activities require grading permits from the Department of Building and Safety.

With the implementation of the required construction BMPs, (as described in **Mitigation Measures 6-1 and 6-2**) soil erosion during construction impacts will be less than significant.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The majority of the Project Site would be covered by the proposed structures; thus, no exposed areas subject

⁴⁰ California, *Seismic Hazard Zone Maps, Southern California, Los Angeles Quadrangle, March 25, 1999*, website: http://gmw.consrv.ca.gov/shmp/download/quad/LOS_ANGELES/maps/ozn_la.pdf, accessed June 12, 2013.

to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be mitigated to a less than significant level.

Mitigation Measures

6-1 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
 - a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
 - b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

6-2 Grading (20,000 Cubic Yards, or 60,000 Square Feet of Surface Area or Greater)

- A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.
- "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
- Movement and removal of approved fencing shall not occur without prior approval by LADBS.

- c) **Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions.

Additionally, as discussed in the response the Question 6(a)(iii) and 6(a)(iv), the Project Site is not at risk for liquefaction or landslides.

Based upon the exploration, laboratory testing, and research, the construction of the Project is feasible from a geotechnical engineering standpoint, provided the advice and recommendations of the Preliminary Geotechnical Engineering Investigation⁴¹ (incorporated by reference) are followed and implemented during construction.

Due to the limited access of the current Site condition, additional exploration will be necessary in order to achieve a thorough investigation of the Site. A comprehensive report should be prepared when the Site is available for additional exploration (see **Mitigation Measure 6-3**). The design information is subject to be modified or reaffirmed subsequent to additional exploration.

The City Department of Building and Safety reviewed the Geotechnical Investigation (September 4, 2013) and required the following to be conducted before the review is completed (letter dated October 3, 2013):

- Provide a comprehensive report once additional exploration and testing is available.
- Substantiate all the anticipated total and differential settlement values give on page 19 of the soils report with calculations. Use actual unreduced (dead plus live) anticipated loads.
- Verify the foundation/mat dimensions used in the settlement calculations are correct.
- Evaluate settlements for the mat foundation to a depth not less than twice the larger mat foundation dimension.

⁴¹ *Preliminary Geotechnical Engineering Investigation, Geotechnologies, September 4, 2013, pages 10-43.*

Geotechnologies prepared two addendums (dated November 18, 2013 and December 16, 2013) to satisfy the City's request. The Department of Building and Safety issued a Soils Report Approval Letter on December 17, 2013.

Three additional borings were excavated in October 2013. Addendum II provided additional information on the elimination of lateral over-excavation due to property line constraints; shoring and lagging; and foundation sizes and settlement analyses. Based on the additional settlement analyses, the differential settlement between foundations bearing on five feet of compacted fill over bedrock and foundations bearing in the dense native soils will be on the order of ½ inch. Therefore, the grading and foundation recommendations presented in the referenced Addendum I remain applicable for the Project.⁴²

After reviewing the two addendums, the City issued a Soils Report Approval Letter on December 17, 2013. The reports are acceptable, provided that 45 conditions listed on pages 2 through 5 are complied with during site development.⁴³ This is included as part of **Mitigation Measure 6-4**.

The Project will not be affected by hazards from landslide, settlement, or slippage, and that the proposed development will have no adverse effect on the geotechnical stability of properties outside of the Project Site, provided it is constructed and maintained in accordance with recommendations presented in the report.⁴⁴ Therefore, potential impacts will be less than significant.

Mitigation Measures

6-4 Geotechnical Report

- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

⁴² Pages 1-2, Addendum II – Additional Geotechnical Comments, Geotechnologies, Inc, December 16, 2013.

⁴³ Pages 2-5, Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, December 17, 2013.

⁴⁴ Preliminary Geotechnical Engineering Investigation, Geotechnologies, September 4, 2013, pages 10-43.

- The project shall comply with the conditions contained within the Department of Building and Safety's Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area.

The onsite geologic materials are in the very low expansion range. The Expansion Index was found to be 4 for a bulk sample remolded to 90 percent of the laboratory maximum density, according to the Geotechnical Engineering Investigation performed by Geotechnologies. Therefore, impacts due to expansive soils are anticipated to be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. This question would apply to the Project only if it were located in an area not served by an existing sewer system.

The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems will occur.

7. GREENHOUSE GAS EMISSIONS

The section is based in part on the following report:

Air Quality, Noise, and Greenhouse Gases Impact Report, Douglas Kim + Associates, September 2013.

a) **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less Than Significant Impact. Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO₂) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO₂ emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO₂ comprises over 80 percent of GHG emissions in California.⁴⁵
- Methane (CH₄) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.⁴⁶
- Nitrous Oxide (N₂O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N₂O emissions.⁴⁷ N₂O emissions from motor vehicles generally occur directly from operation of vehicles.
- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions

⁴⁵ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 11.

⁴⁶ United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003*, April 2005 (EPA 430-R-05-003)

⁴⁷ United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N₂O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001

from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF₆) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF₆ are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.⁴⁸ The other GHGs are less abundant but have higher GWP than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. High GWP gases such as HFCs, PFCs, and SF₆ are the most heat-absorbent. See Table 4.7-1 for the global warming potential of various greenhouse gases.

**Table 4.7-1
Global Warming Potential for Greenhouse Gases**

Greenhouse Gas	Global Warming Potential
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	21
Nitrous Oxide (N ₂ O)	310
HFCs, PFCs	6,500
Sulfur Hexafluoride (SF ₆)	23,900

*Source: BAAQMD Source Inventory of Bay Area Greenhouse Gas Emissions. November 2006.
From Table 5-1 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

The effects of increasing global temperature are far-reaching and difficult to quantify. In general, increases in the ambient global temperature as a result of increased GHGs is anticipated to result in rising sea levels which could threaten coastal areas through accelerated coastal erosion, threats to levees and inland water systems and disruption to coastal wetlands and habitat.

If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy

⁴⁸ California Air Resources Board, *Climate Change Emission Control Regulations, 2004*

Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population.

Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to begin the process of adapting the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy analyzes risks and vulnerabilities and proposes strategies to reduce risks.

Regulatory Setting

Federal

The U.S. EPA has historically not regulated GHGs because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHGs could be considered within the Clean Air Act's definition of a pollutant.⁴⁹ In December 2009, U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

State

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The

⁴⁹ *Massachusetts v. Environmental Protection Agency et al* (127 S. Ct. 1438 (2007))

California Environmental Protection Agency formed a Climate Action Team that recommended strategies that can be implemented by State agencies to meet GHG targets.

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. A companion bill, Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the State.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.⁵⁰ On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. CARB determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit is 427 million metric tons of CO₂e. The 2020 target reductions are currently estimated to be 174 million metric tons of CO₂e.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. These include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. The measures will be developed and put in place by 2012. CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO₂ per year and make up 94 percent of the point source CO₂ emissions in California.

In response to SB 97, the Governor's Office of Planning and Research (OPR) adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;

⁵⁰California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government:

- (1) regional long-range transportation plans and investments;
- (2) regional allocation of the obligation for cities and counties to zone for housing; and
- (3) a process to achieve greenhouse gas emissions reductions targets for the transportation sector.

It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.⁵¹

On October 24, 2008, CARB published draft guidance for setting interim GHG significance thresholds. This was the first step toward developing the recommended Statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB believes that thresholds in these sectors will advance climate objectives, streamline project review, and encourage in CEQA analyses of GHG emissions throughout the State.

⁵¹*American Planning Association, California Chapter, Analysis of SB 375, <http://www.calapa.org/-en/cms/?2841>, accessed March 30, 2009.*

Regional

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies.

Local

The City of Los Angeles has adopted its LA Green Plan that outlines goals and actions to reduce the generation of GHGs to 35 percent below 1990 levels. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos.

The City adopted a Green Building Ordinance in April 2008 (updated in 2013) that calls for reduction of the use of natural resources for new development. Larger projects must be certified by the Leadership in Energy and Environmental Design (LEED), including:

- New non-residential building or structure of 50,000 gross square feet or more of floor area;
- New mixed-use or residential building of 50,000 gross square feet or more in excess of six stories;
- New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
- The alteration or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
- The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

The City's Green Building Ordinance has requirements that call for reductions in GHG emissions from reducing energy use, water use, and solid waste generation.

Existing Air Quality

Existing GHG Emissions Inventory

In December 2006, the California Energy Commission prepared an inventory of GHG emissions for the State.⁵² It includes a projected inventory of 542 million metric tons of CO₂e in 2010 and 610 million metric tons in 2020.

Existing Site Emissions

The Project Site is currently a 14,000 square foot commercial retail facility with ancillary surface level parking. As such, it generates GHG emissions through the combustion of fuel for energy and from area sources. It also generates GHG emissions from approximately 242 daily vehicle trips (excluding pass-by trips) that access the site.⁵³

As shown in Table 4.7-2, Existing Annual Greenhouse Gas Emissions, the existing development generates the majority of its GHG emissions from mobile sources.

**Table 4.7-2
Existing Annual Greenhouse Gas Emissions**

Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Source	3.5000e-004	0.0	0.0	3.7000e-004
Energy Source	119.6	2.8200e-003	6.0000e-004	119.8
Mobile Source	206.9	0.01	0.0	207.1
Waste Source	3.0	0.2	0.0	6.7
Water Source	11.8	0.03	8.5000e-004	12.8
Total Emissions	341	0.2	1.4500e-003	346.4

Metric tons per year
Source: DKA Planning, 2013 based on CalEEMod 2013.2.
From Table 5-2 of Air Quality, Noise, and Greenhouse Gases Impact Report.

Methodology

The methodology utilized for the following analysis is based on a Technical Advisory released by the Governor’s Office of Planning and Research (OPR) on June 19, 2008 titled CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review. GHG emissions were quantified from construction and operation of the proposed project using the URBEMIS

⁵² California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004*; CEC-600-2006-013-SF (December 2006).

⁵³Crain & Associates, *Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, August 2013.*

2007 model. Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions.

To assess the project's consistency with AB 32 emission reduction targets, this analysis includes potential emissions under two scenarios. First, a "business-as-usual" scenario was developed that is based on historic trends across economic sectors and represents emissions in the absence of GHG reduction measures (e.g., AB 1493 standards for vehicles, the California Low Carbon Fuel Standard, full implementation of the Renewables Portfolio Standard). Second, an "As Proposed" scenario was developed that includes project design features and implementation of State mandates that reduce GHG emissions across economic sectors. This also includes the January 2011 revisions to Title 24 commonly known as the California Green Building Standards Code, as well as full implementation of the 33 percent Renewables Portfolio Standard for the Los Angeles Department of Water and Power, the California Low Carbon Fuel Standard, and tailpipe standards in AB 1493 (Pavley).

Significance Criteria

Given the evolving nature of the issue, there are no quantitative standards for judging the significance of a project's impacts on climate change in the South Coast Air Basin. As a result, this analysis relies on primary direction from the CEQA Guidelines. The March 2010 amendments to CEQA Guidelines Appendix G indicate a project could have a significant impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Further, CEQA Guidelines Section 15064.4 states that:

1. A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:
 - a. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
 - b. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
 - c. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a

particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

To that end, this analysis recognizes that the AB 32 Scoping Plan represents the most significant plan for reducing GHG emissions. In calling for a return to 1990 levels of GHG emissions by 2020, the Plan contains strategies targeting direct regulations, market-based incentives, voluntary actions, and other strategies that would reduce statewide GHG emissions. These goals encouraged local governments to adopt a reduction goal for municipal operations emissions and community emissions of 15 percent from current levels by 2020. In the 2011 Scoping Plan, the statewide emissions reduction goal was revised to 16 percent. SCAG has proposed draft reduction targets specific to land use decisions at much lower levels, approximately 8–13 percent below “business-as-usual” emissions. Therefore, demonstrating consistency with the more aggressive AB 32 statewide targets is considered to be conservative.

Consequently, this analysis discloses potential GHG emissions and finds that the proposed project’s impact on climate change would be significant if:

1. It conflicts with or obstructs implementation of the AB 32 Scoping Plan.
2. It does not constitute an equivalent or larger break from “business-as-usual” than has been determined by the CARB to be necessary to meet the AB 32 goals (approximately 15 percent for community emissions).

Project Impacts

Construction

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. These impacts would vary day to day over the 41-month duration of construction activities.

As illustrated in Table 4.7-3, Estimated Daily Construction Emissions – Mitigated, construction emissions of CO₂e would peak during grading, where 8,152 lbs/day of CO₂e are anticipated.

**Table 4.7-3
Estimated Daily Construction Emissions - Mitigated**

Construction Phase	Main Site CO ₂ (Pounds per Day)
Demolition	
On-Site Emissions	4,184
Off-Site Emissions	645
Total Emissions	4,829

**Table 4.7-3
Estimated Daily Construction Emissions - Mitigated**

Construction Phase	Main Site CO₂ (Pounds per Day)
Site Preparation	
On-Site Emissions	1,615
Off-Site Emissions	105
Total Emissions	1,720
Grading	
On-Site Emissions	3,179
Off-Site Emissions	4,973
Total Emissions	8,152
Building Construction	
On-Site Emissions	2,721
Off-Site Emissions	5,430
Total Emissions	8,151
Paving	
On-Site Emissions	1,147
Off-Site Emissions	95
Total Emissions	1,242
Architectural Coating	
On-Site Emissions	282
Off-Site Emissions	782
Total Emissions	1,064
Maximum Daily (pounds)	8,152
<i>From Table 5-3 of Air Quality, Noise, and Greenhouse Gases Impact Report.</i>	

Operation

Greenhouse gas emissions were calculated for area source and mobile vehicle operations. As shown in Table 4.7-4, Estimated Annual Greenhouse Gas Emissions, the Project would emit 5,899 metric tons of CO₂e per year during typical operations (including amortized construction emissions).

This represents a 19 percent reduction in CO₂e emissions from a Business-As-Usual scenario and is thereby consistent with the State’s AB 32 Scoping Plan objectives for reducing community-based emissions.

The Project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond the "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Because the development would exceed six stories, the Project is considered a high-rise residential building that must incorporate several measures and design elements that reduce the carbon footprint of the development:

1. **GHG Emissions Associated with Energy Demand.** The project must meet Title 24 2013 standards and include ENERGY STAR appliances.
2. **GHG Emissions Associated with Solid Waste Generation.** The project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.
3. **GHG Emissions Associated with Water Use.** The project would be required to develop a Storm Water Pollution Prevention Plan that covers prevention of soil loss by storm water run-off and/or wind erosion, sedimentation, and/or dust/particulate matter air pollution. It must provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.
4. **GHG Emissions Associated with Motor Vehicles.** The project is required to provide short- and long-term bicycle parking, and designate parking for low emission vehicles. Statewide regulations will help reduce motor vehicle emissions associated with project through the implementation of low carbon fuel standards, tailpipe emission controls, and other requirements. In addition, SB 375 will call for balanced growth policies that encourage infill development that reduces the carbon footprint of the State. The project is an infill development that will reduce GHG emissions by locating residential and commercial retail development near commercial districts and providing access to public transportation bus lines along Broadway, 4th Street, and other major arterials.

In addition to the GHG emission reductions described above, it is important to note that the CO₂ estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a

project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

**Table 4.7-4
Estimated Annual CO₂e Emissions (Metric Tons)**

Scenario and Source	Business as Usual Scenario	As Proposed Scenario	Reduction from Business as Usual Scenario	Change from Business as Usual Scenario
Area Source	8	8	-1	-7%
Energy Source	1,177	1,100	-77	-7%
Mobile Source	5,237	4,224	-1,014	-24%
Waste Source	110	98	-13	-13%
Water Source	396	370	-26	-7%
Construction	100	100	0	-0%
Total Emissions	7,029	5,899	-1,130	-19%

Metric tons per year

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance.

Source: DKA Planning, 2013 based on CalEEMod 2013.2 model runs.

From Table 5-4 of Air Quality, Noise, and Greenhouse Gases Impact Report.

For example, if a substantial portion of California’s population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

It is impossible to know at this time whether residents of the Project would have longer or shorter trips relative to their destinations; whether they would walk, bike, and use public transportation more or less than under existing circumstances; and whether their overall driving habits would result in higher or lower VMT. Much of the vehicle-generated CO₂ emissions attributed to the project could simply be from vehicles at an existing location moving to the project site, and not from new vehicle emissions sources relative to global climate change.

Therefore, although it is not possible to calculate the net contribution of vehicle-generated CO₂, CH₄, and N₂O emissions from the Project (i.e., project generated emissions minus current emissions from vehicles that would move to the project site), the net contribution would likely be much less than the estimated emissions and therefore greenhouse gas impacts are anticipated to be less than significant.

b) Would the project conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. However, the AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the Project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change.

As shown in Table 4.7-5, the project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan. As a result, the Project's cumulative impact on climate change is considered less than significant.

**Table 4.7-5
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies**

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	Not Applicable The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	Not Applicable The development of standards is not relevant to the Project.
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	Consistent The project is designed to meet Cal Green building standards.
Renewables Portfolio Standard Achieve 33 percent renewable energy mix statewide.	Consistent The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard Develop and adopt the Low Carbon Fuel Standard.	Not Applicable The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases Develop regional greenhouse gas emissions reduction	Not Applicable The development of regional planning goals is not relevant

**Table 4.7-5
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies**

Strategy	Project Consistency
targets for passenger vehicles.	to the Project.
Vehicle Efficiency Measures Implement light-duty vehicle efficiency measures.	Not Applicable State agencies are responsible for implementing efficiency measures.
Goods Movement Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Neutral. The project does not include solar roofs and is not part of the proposed Statewide initiative.
Medium/Heavy-Duty Vehicles Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable State agencies are responsible for implementing efficiency measures.
Industrial Emissions Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	Not Applicable This measure addresses industrial facilities.
High Speed Rail Support implementation of a high speed rail system.	Not Applicable This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. The Project is designed to meet Cal Green building standards.
High Global Warming Potential Gases Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	Consistent. The proposed project would recycle a majority of construction debris, re-use existing materials in new construction, use recycled content materials, and use recycled mulch.
Sustainable Forests	Not Applicable

**Table 4.7-5
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies**

Strategy	Project Consistency
Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Resource Agency departments are responsible for implementing this measure.
Water Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.
Agriculture In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable The Project does not include agricultural facilities.
<i>Source: DKA Planning, 2013. From Table 5-5 of Air Quality, Noise, and Greenhouse Gases Impact Report.</i>	

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following report:

Phase I Environmental Site Assessment Report, 400-416 Broadway, Partner Engineering and Science, Inc., February 5, 2013.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

The Project would construct residential units and retail space on an existing urban retail site. Other than the typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project. Therefore, the Project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Site Reconnaissance

As part of the Phase I Environmental Site Assessment Report, Partner Engineering and Science, Inc. performed site reconnaissance. As part of the site reconnaissance, Partner noted that the Project Site currently occupied by a two story parking structure with attached retail suites for commercial use. Onsite operations consist of a public parking lot, restaurant operations, and retail sales. Non-hazardous waste is deposited into three dumpsters located inside the covered area of the garage on the Project Site and the waste is collected and disposed of by Waste Management Inc. Sanitary sewage is discharged into the municipal sanitary sewer system. No process wastewater is generated at this site and no evidence of wells or cisterns were identified on the Project Site. There are no hazardous materials or petroleum products currently used or stored on site. No drums or containers of regulated substances were observed on the Project Site at the time of the site inspection. No biohazardous waste was identified on the site at the time of site inspection. No evidence of pits, drywells or catchbasins was identified on the Project Site. Additionally, there is no visual evidence of existing or historical Underground Storage Tanks or Aboveground Storage Tanks identified at the property. The property was inspected for equipment

contaminated with polychlorinated biphenyls (PCBs), such as electrical transformers. A visual inspection found incandescent and fluorescent light fixtures that are unlikely to contain PCBs and a locked vaulted transformer that Partner was not able to gain access to in order to confirm presence of PCBs, however there was no visual evidence of PCB release observed around the transformer. The EPA Map of Radon Zones for Los Angeles County places the property in Zone 3, areas of low potential for radon exposure. Due to the date of construction of the existing building on site, it is unlikely that lead-based paints are present.

Site History

As part of the Phase I, Partner conducted a historical review of the Site as well as a regulatory records review. This included reviewing historical aerial photographs, topographic maps, Sanborn Fire Insurance maps, and a City directory search. Additionally, Partner reviewed regulatory records provided by the State Water Resources Control Board, the Los Angeles County Environmental Health Department, Los Angeles Fire Department, Air Quality Management District, Regional Water Quality Control Board, Department of Toxic Substances Control, the Los Angeles Department of Building and Safety, the Los Angeles Department of City Planning, and the California Division of Oil, Gas, and Geothermal Resources. Partner also conducted a mapped database records search. According to available historical sources, the subject property was formerly developed as early as 1888 with residences, developed with a chamber of commerce building, a dwelling and stables by 1894, developed with mixed use office/retail and a hotel between 1906 and 1984, and developed with the current structure in 1985. The records and database review did not identify any recognized environmental conditions, historical recognized environmental conditions, or environmental issues.

Adjacent Property Reconnaissance

The adjacent property reconnaissance consisted of observing the adjacent properties from the Project Site premises. No items of environmental concern were identified on the adjacent properties during the site inspection, including hazardous materials, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

Asbestos-Containing Materials (ACMs)

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Asbestos is commonly used as an acoustic insulator, thermal insulation, fire proofing and in other building materials. Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in asbestos fibers. Continued exposure can increase the amount of fibers that remain in the lung. Fibers embedded in lung tissue over time may cause serious lung diseases including: asbestosis, lung cancer, or mesothelioma.

The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be *presumed* to contain asbestos, for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building constructed prior to 1980 and have not been appropriately tested are “presumed asbestos-containing material” (PACM).

The Project Site building was constructed in 1985. As such, an asbestos evaluation was not required by the scope of services; however, there are observed materials that would be considered suspect ACMs in the event of a thorough survey:

- Drywall Systems located throughout the building interior
- Floor tiles located throughout the building interior

The limited visual survey consisted of noting observable materials (materials which were readily accessible and visible during the course of the site reconnaissance) that are commonly known to potentially contain asbestos. This activity was not designed to discover all sources of suspect ACM, PACM, or asbestos at the site; or to comply with any regulations and/or laws relative to planned disturbance of building materials such as renovation or demolition, or any other regulatory purpose. Rather, it is intended to give an indication if significant (significant due to quantity, accessibility, or condition) potential sources of ACM or PACM are present at the Project Site. Additional sampling, inspection, and evaluation will be warranted for any other use.

According to the US EPA, ACM and PACM that is intact and in good condition can, in general, be managed safely in-place under an Operations and Maintenance (O&M) Program until removal is dictated by renovation, demolition, or deteriorating material condition. Prior to any disturbance of the construction materials within this facility, a comprehensive ACM survey is recommended. This is included as **Mitigation Measure 8-1**.

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substance or petroleum product on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term REC includes hazardous substances and petroleum products even under conditions that might be in compliance with laws. The term is not intended to include "de minimis" conditions that do not present a threat to human health and/or the environment and that would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

- Partner did not identify any recognized environmental conditions during the course of its assessment.

A *historical recognized environmental condition (HREC)* refers to an environmental condition which would have been considered a REC in the past, but which is no longer considered a REC based on subsequent assessment or regulatory closure.

- Partner did not identify any historical recognized environmental conditions during the course of its assessment.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, require discussion. The following was identified during the course of this assessment:

- Partner did not identify any environmental issues during the course of this assessment.

Conclusion

Partner's assessment has revealed no evidence of recognized environmental conditions or environmental issues in connection with the Site. Based on the conclusions of its assessment, Partner recommends no further investigation of the Project Site at this time.

Partner recommended a comprehensive ACM survey. Due to the age of the building being demolished, toxic and/or hazardous construction materials may be located in the structure. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, these impacts can be mitigated to a less than significant level by **Mitigation Measure 8-1**.

Mitigation Measure

8-1 Explosion/Release (Existing Toxic/Hazardous Construction Materials)

- **(Asbestos)** Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

There are no schools within 0.25 mile (1,320 feet) of the Project Site.⁵⁴

In addition, the Project will not emit any hazardous substances during construction or operation. Therefore, impacts of hazardous materials within one-quarter mile of a school will not occur.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referred to lists and therefore would pose an environmental hazard to surrounding sensitive uses.

In meeting the provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency.

According to EnviroStor, there are no cleanup sites, permitted sites, or other sites on the Project Site.⁵⁵

According to GeoTracker, there are no LUST Cleanup Sites, Other Cleanup Sites, Land Disposal Sites, Military Sites, WDR (Waste Discharge Requirements) Sites, Permitted UST Facilities, Monitoring Wells, DTSC Cleanup Sites, or DTSC Hazardous Waste Permit sites on the Project Site.⁵⁶

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.⁵⁷

⁵⁴ LAUSD: http://home.lausd.net/ourpages/auto/2012/3/19/43726930/EducationalServiceCenter_Map_EAST_2012-2013.pdf

⁵⁵ State of California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtscc.ca.gov/public/>, accessed August 14, 2013.

⁵⁶ State of California Environmental Protection Agency, State Water Resources Control Board, Geotracker, website: <http://geotracker.waterboards.ca.gov/map/>, accessed August 14, 2013.

⁵⁷ State of California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed August 14, 2013.

There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.⁵⁸

The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.⁵⁹

Therefore, as the Project Site is not located on a list of hazardous material sites and will not result in a significant hazard to the public or environment, no impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area or within two miles of a public airport, and subject to a safety hazard.

The Project is not within an airport hazard area.⁶⁰ The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 11 miles southwest, Santa Monica Airport located 11 miles west, Bob Hope-Burbank Airport located 11 miles northwest. Therefore no impact would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard.

There are no nearby private airstrips. Therefore, no impacts will occur.

⁵⁸ State of California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/default.htm>, accessed August 14, 2013.

⁵⁹ State of California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, accessed August 14, 2013.

⁶⁰ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 400 Broadway, website: <http://zimas.lacity.org/>.

- g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Broadway or 4th Street, and would not interfere with any adopted emergency response plan or emergency evacuation plan. According to the City's Safety Element, Temple Street and Alameda Street are identified as selected disaster routes.⁶¹ The Project would not impact either street.

As discussed under Section 16, Transportation and Traffic, of this IS/MND, the Project will not result in significant traffic impacts at any of the 10 study intersections, any CMP monitoring locations, or public transit.⁶² Given that the height of the building is greater than 75 feet, the Project will be required to submit an emergency evacuation plan for approval by the Fire Department per LAMC Section 57.33.19. Compliance with this requirement will ensure impacts from the project are less than significant.

- h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire.

The Project Site is not located in a Very High Fire Hazard Severity Zone,⁶³ nor does the Site contain any wildlands or high fire hazard terrain or vegetation. Therefore, no impacts will occur.

⁶¹ *Los Angeles Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles:* <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>.

⁶² *Traffic Impact Study, Crain & Associates, August 5, 2013, page 57.*

⁶³ *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 400 Broadway, website: <http://zimas.lacity.org/>.*

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems.

The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality.

The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs.

The SUSMP identifies the types and sizes of private development projects that are subject to its requirements. Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC 64.70 (the City's stormwater ordinance) and expanding on the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP, requiring a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures.

All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. Project must comply with the LID Best Management Practices (BMPSs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply.

The Project will be required to obtain an NPDES water quality permit from the LARWQCB. Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs.

As construction of the Project will not disturb more than one acre of land (the total site area is 0.786 acres)⁶⁴, the Project Applicant will not be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).⁶⁵

However, construction projects that include grading activities during the rainy season must develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, impacts related to water quality will be less than significant. Additionally, with the incorporation of the mitigation measure below, impacts related to water quality would be reduced to a less than significant level.

Mitigation Measure

9-1 Stormwater Pollution (Demolition, Grading, and Construction Activities)

- Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.
- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

⁶⁴ See Section 2, *Project Description for breakdown of land area.*

⁶⁵ California Environmental Protection Agency, State Water Resources Control Board, *Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed August 28, 2013.*

- b) **Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

According to topographic map interpretation, the direction of groundwater in the vicinity of the Site is inferred to flow toward the southeast. The nearest surface water in the vicinity of the Site is the Los Angeles River located approximately 5,000 feet east of the Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed at the Site.⁶⁶

According to available information, a public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. According to a representative of the LADWP, shallow groundwater directly beneath the Site is not utilized for domestic purposes. The sources of public water for the City of Los Angeles are surface water from California Water Project.

According to GeoTracker, the depth of groundwater in the vicinity of the Site is inferred to be present at approximately 86 feet below ground surface (bgs).⁶⁷

Grading would consist of excavations approximately 20 feet below the ground surface for the two lower garage levels (B2 and B1). As excavation activities will not extend close to any groundwater level⁶⁸, the development of the Project would not interfere with the current groundwater flows, the existing groundwater level, or groundwater recharge.

The Project Site is covered with an existing building containing retail and parking. The Project will not increase the amount of impermeable surfaces on the Project Site. There are no groundwater wells located on-site and the Project does not involve the withdrawal of groundwater. Therefore, the Project will neither increase the amount of stormwater entering the groundwater table, nor deplete the groundwater through wells. As such, impacts related to groundwater depletion will be less than significant.

⁶⁶ *Phase I Environmental Site Assessment, Partner, February 5, 2013, page 5.*

⁶⁷ *Phase I Environmental Site Assessment, Partner, February 5, 2013, page 5.*

⁶⁸ *86 feet as measured by Geotracker, or 45 feet according to historically high groundwater level, or beyond 120 according to the boring excavation in the Geotechnical Engineering Investigation page 4.*

- c) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project.

No natural watercourses exist on or in the vicinity of the Project Site. No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site.⁶⁹ The nearest wetland (classified as riverine) is located at the Los Angeles River approximately 1.25 miles east of the Project Site.

The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building. The Project building will also cover the entire Site with an impervious surface. The amount of impervious surface would not substantially change between the existing use and proposed use. There would be no exposed land/soil that could create erosion or siltation. Thus, the Project would not result in substantial erosion or siltation on- or off-site. Therefore, impacts will be less than significant.

- d) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties.

No natural watercourses exist on or in the vicinity of the Project Site. No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site.⁷⁰ The nearest wetland (classified as riverine) is located at the Los Angeles River approximately 1.25 miles east of the Project Site.

Stormwater flows southwest along Broadway and southeast along 4th Street. There is a stormwater catch basin at the corner of 4th Street and Broadway. The catch basin connects to a storm drain connector pipe

⁶⁹ U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed June 12, 2013.*

⁷⁰ U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed June 12, 2013.*

(round, 18-inch diameter, reinforced concrete pipe) under 4th Street. This connects to a main line pipe round, 61-inch diameter, reinforced concrete pipe) that runs parallel under 4th Street⁷¹

Runoff currently flows toward the existing storm drain system, and development of the Project will not alter the amount of runoff from the Project Site. The entire Project Site is presently covered with impermeable surfaces (hardscape, paving, or the building), and with development of the Project, the Project Site will continue to be covered with impermeable surfaces.

Thus, no substantial increase in the rate or amount of surface runoff is expected to occur with Project development. No flooding is expected to occur on- or off-site due to the level grades of the adjacent streets. Thus, the Project will not result in a substantial increase in stormwater runoff from the Project Site above existing levels. Impacts related to runoff will be less than significant.

e) **Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains.

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean.

As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program as well as the requirements set forth in Section 64.70 of the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants.

Construction

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are:

- 1) the handling, storage, and disposal of construction materials containing pollutants;
- 2) the maintenance and operation of construction equipment; and

⁷¹ *Navigate LA, City of Los Angeles, Bureau of Engineering, Storm Drains (Storm Drain Inlets and Storm Pipes) Layer: <http://navigatela.lacity.org/index01.cfm>*

- 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment.

Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants.

The Project is also required to comply with Section 64.70 of the LAMC and the City of Los Angeles’ Low Impact Development BMPs, which are determined on a case-by-case basis by the Department of Public Works. Approval for development project and building/grading permits would not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project design plans, thereby mitigating potential impacts to a less-than-significant level.

Operation

The Project Site primarily consists of impermeable surfaces as it is fully paved and developed. The Project will not result in a change in the amount of impervious surface area at the Project Site, and would therefore not be anticipated to result in an increase in stormwater runoff from the Project Site.

Activities associated with operation of the Project will generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking area could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system.

However, impacts to water quality would be reduced since the project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for water quality impacts to a less than significant level.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. . A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. The Project does

not include any long-term sources of contaminants that could substantially degrade water quality. However, there will be an increased potential to degrade water quality standards during the grading and construction period. Potential impacts will be reduced to a less-than-significant level through the incorporation of Mitigation Measure 9-1, above, and through compliance with the stormwater requirements of LAMC Section 64.70. Therefore, impacts to water quality would be less than significant.

- g) **Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood zone. While the Project will include residential dwelling units, it would not be located in a 100-year flood hazard area according to the Los Angeles Safety Element map.⁷² Therefore, the Project will not place housing within a 100-year flood hazard area and no impact related to this issue would occur.

- h) **Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows.

According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) for the project area indicates that the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.⁷³ Additionally, the Project Site is not located within a City-designated 100- or 500-year floodplain.⁷⁴ Therefore, the Project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

- i) **Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

No Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The Project Site is not within a potential inundation area according to the Los Angeles City Planning Department

⁷² *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles:* <http://cityplanning.lacity.org/cwd/gnlpln/saftevt.pdf>.

⁷³ *Federal Emergency Management Agency, Flood Insurance Rate Maps, DFIRM 06037C1636F*

⁷⁴ *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles:* <http://cityplanning.lacity.org/cwd/gnlpln/saftevt.pdf>.

Environmental and Public Facilities Maps (September 1, 1996), therefore there will be no impacts due to the failure of a levee or dam.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project Site is not located within a potential inundation area.⁷⁵

The Project Site is not located within an area potentially impacted by a tsunami, which is typically located along the coast of the Pacific Ocean.⁷⁶

Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. There are no levees or dams nearby.

The Project Site is not located within a Hillside Area.⁷⁷ There is no potential for mudflow.

Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Impacts related to tsunamis, seiches, and mudflow will be less than significant.

⁷⁵ Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/saftevt.pdf>.

⁷⁶ Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/saftevt.pdf>.

⁷⁷ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, website: <http://zimas.lacity.org/>, accessed June 12, 2013.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community.

The Project is not of the scale or nature that could physically divide an established community. The Project is not affecting any right-of-ways.

As such, impacts related to physical division of an established community will be less than significant.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The following is a list of applicable plans:

Regional Level

- *Southern California Association of Governments*
 - Regional Comprehensive Plan and Guide (RCPG)
 - Compass Blueprint
 - Regional Comprehensive Plan (RCP)
 - Regional Transportation Plan (RTP)
- *South Coast Air Quality Management District (SCAQMD)*
 - *Air Quality Management Plan (AQMP)*
- *Los Angeles County Metropolitan Transportation Authority (Metro)*
 - *Congestion Management Plan (CMP) for Los Angeles County.*

City of Los Angeles

- *City of Los Angeles General Plan, including Framework Element and Land Use Element*
- *Central City Community Plan*
- *Broadway Theater and Entertainment District Design Guide Community Design Overlay and Ordinance No. 180,871*
- *Downtown Design Guide*
- *Broadway Streetscape Plan*
- *City Center Redevelopment Project*
- *City of Los Angeles Planning and Zoning Code*

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

Compass Blueprint Growth Vision Report

The Compass Blueprint Growth Vision, adopted by SCAG as part of its June 2004 Southern California Compass Growth Vision Report, is an implementing mechanism for the regional growth strategies outlined in the SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG). The Compass Growth Vision is intended to provide a strategy to accommodate the projected 24 million residents expected to live in the region by 2035 while balancing valuable quality of life goals. The Compass Vision emphasizes focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable communities, targeting growth around existing and planned transit stations, and preserving existing open space and stable residential areas.

Four principles were established for the Compass Blueprint Growth Vision Report that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and

be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (a) encourage transportation investments and land use decisions that are mutually supportive; (b) locate new housing near existing jobs and new jobs near existing housing; (c) encourage transit-oriented development; and (d) promote a variety of travel choices.
- *Principle 2. Foster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote “people scaled,” pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.
- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

The Compass Blueprint 2% Strategy is a guideline for how and where the Growth Vision can be implemented. It calls for moderate changes to current land use and transportation trends in 2 percent of the land area of the region, known as the 2% Strategy Opportunity Areas. These areas are defined as having a high potential to implement projects, plans, and/or policies consistent with the Compass principles that would result in the greatest progress towards economic, mobility, livability and sustainability benefits to local neighborhoods.

Table 4.10-1, SCAG Compass Blueprint, lists the initiatives and objectives of the SCAG Compass Blueprint and the Project’s consistency statement with each of them. As shown, the Project would be consistent with the applicable (developer-controlled or focused) initiatives and objectives of the Compass Blueprint.

**Table 4.10-1
SCAG Compass Blueprint**

Initiative and Objective	Discussion
Initiative 1 Increase the region's mobility	Consistent. The Project would increase residential density in an urban area that is well served by local and regional transit lines, such as the Metro rail lines, Metro bus lines, and LADOT DASH line.
Objective 1-1 Encouraging transportation investments and land use decisions that are mutually supportive	Consistent. The Project would increase residential density in an urban area that is well served by local and regional transit lines. The Project would increase the residents, visitors, and employees who would utilize the forthcoming Metro Regional Connector and Metro Broadway Streetcar.
Objective 1-2 Locating new housing near existing jobs and new jobs near existing housing	Consistent. The Project would provide new housing in Downtown Los Angeles, a rich jobs area. The Project would also include retail, which would provide jobs to the local residential community.
Objective 1-3 Encouraging transit-oriented development	Consistent. The Project would increase residential density in an urban area that is well served by local and regional transit lines.
Objective 1-4 Promoting a variety of travel choices	Consistent. The Project would allow residents, visitors, and employees to access the Site via vehicle, walking, and biking. The Project includes substantial bicycle parking.
Initiative 2 Enhance the livability of our communities	Consistent. The Project would redevelop an underutilized and low-density retail use at a prominent corner with a dense, mixed-use building designed to the standards of the Design Guide and Community Overlay.
Objective 2-1 Promoting in-fill development and redevelopment to revitalize existing communities	Consistent. The Project would redevelop an underutilized and low-density retail use at a prominent corner with a dense, mixed-use building designed to the standards of the Design Guide and Community Overlay.
Objective 2-2 Promoting developments which provide a mix of uses	Consistent. The Project would provide a mix of uses including residential and retail.
Objective 2-3 Promoting "people-scaled," walkable communities	Consistent. The Project would be designed with architectural features on its lower floors to be people-scaled and accessible, including ground-floor retail. The surrounding sidewalks on Broadway and 4 th Street are wide and include a variety of street furniture including News Kiosks.
Objective 2-4 Supporting the preservation of stable neighborhoods	Consistent. The Project would provide residential and retail uses that are already included in the local area. There would not be an introduction of a substantially altered use. The area also supports mid- and high-rise buildings.
Initiative 3 Enable prosperity	Consistent. The Project would redevelop an underutilized and low-density retail use at a prominent corner with a dense, mixed-use building. This would increase the tax revenues and property tax generated at the Site.
Objective 3-1 Providing a variety of housing types in each community to meet the housing needs of all income levels	Consistent. The Project provides new housing in a range of sizes and prices (studio, 1, and 2 bedrooms).

Initiative and Objective	Discussion
Objective 3-2 Supporting educational opportunities that promote balanced growth	Not Applicable. The Project is not an educational facility.
Objective 3-3 Ensuring environmental justice regardless of race, ethnicity or income class	Consistent. The Project would provide housing consistent with the federal, State, and local laws that prohibit housing discrimination based on race, ethnicity, or income class, consistent with the Los Angeles Housing and Community Investment Department.
Objective 3-4 Supporting local and state fiscal policies that encourage balanced growth	Not Applicable. The Project is a private development and cannot affect local and state fiscal policies encouraging balanced growth.
Objective 3-5 Encouraging civic engagement	Not Applicable. The Project is a private development and cannot affect civic engagement.
Initiative 4 Promote sustainability for future generations	Consistent. The Project will comply with CalGreen requirements of the California Building Code. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint. The Project also includes mitigation measures that reduce consumption and generation of utility resources (such as water, wastewater, solid waste), air quality emissions (pollution) and greenhouse gas emissions.
Objective 4-1 Developing strategies to accommodate growth that use resources efficiently, and minimize pollution and greenhouse gas emissions	Consistent. The Project is undergoing an environmental review process through CEQA, resulting in this Mitigated Negative Declaration that includes mitigation measures that avoid, minimize, rectify, reduce, or compensate any potential environmental impact. These potential impacts include utility resources, air quality emissions (pollution) and greenhouse gas emissions.
Objective 4-2 Preserving rural, agricultural, recreational and environmentally sensitive areas	Not Applicable. The Project is located on a developed area surrounded by a dense urban environment in Downtown Los Angeles. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Site.
Objective 4-3 Focusing development in urban centers and existing cities	Consistent. The Project is located in the urban center of Downtown in the City of Los Angeles.
Objective 4-4 Using "green" development techniques	Consistent. The Project will comply with CalGreen requirements of the California Building Code. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
<p>Source: SCAG, Compass Blueprint: http://www.compassblueprint.org/Pages/About%20Pages/About.aspx Table: CAJA Environmental Services, August 2013.</p>	

Regional Comprehensive Plan (RCP)

SCAG has also prepared the 2008 Regional Comprehensive Plan (the 2008 RCP) in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.⁷⁸ The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Growth Vision Report and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced RCPG for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the Regional Transportation Plan (RTP) (discussed below) and the Compass Growth Vision Report. Nevertheless, a discussion of the Project's consistency with the relevant policies in the 2008 RCP is presented in Table 4.10-2. As shown therein, the Project would be consistent with the applicable (developer-controlled or focused) policies.

⁷⁸ 2008 Regional Comprehensive Plan, SCAG, <http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP>.

**Table 4.10-2
SCAG Regional Comprehensive Plan**

Policies	Discussion
Land Use and Housing¹	
<p>LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
Open Space and Habitat²	
<p>OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities:</p> <ul style="list-style-type: none"> • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. 	<p>Consistent. The Project would be an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located on a developed area surrounded by a dense urban environment in Downtown Los Angeles. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Site.</p>

Policies	Discussion
<ul style="list-style-type: none"> Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects. 	
<p>OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.</p>	<p>Not Applicable. OSC-9 does not apply to this Project as it is not near natural areas for outdoor recreation.</p>
<p>OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The Project is an infill development in an existing community.</p>
<p>OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
<p>OSC-12 Developers and local governments should promote water-efficient land use and development.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
<p>OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.</p>	<p>Consistent. The Project would contain multiple uses (residential and retail) and be a redevelopment of an urban area. It will bring residents within proximity to local parks and recreational uses.</p>
<p>Water³</p>	
<p>WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</p>	<p>Consistent. The Project includes conservation features to reduce water use for operation and irrigation.</p>
<p>WA-10 Developers and local governments should include conjunctive use as a water</p>	<p>Consistent. Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active</p>

Policies	Discussion
management strategy when feasible.	form of conjunctive use utilizes artificial recharge, where surface water is intentionally percolated or injected into aquifers for later use. The Project would not conflict or preclude the City from exploring conjunctive use as a water management strategy.
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	Consistent The Project would confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. The Project Applicant shall implement any upgrade to the water infrastructure serving the Project Site that is needed to accommodate the Project's water consumption needs.
WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	Consistent. The Project would include minimal landscaping. Drought-tolerant native plants and weather-based irrigation systems will be used where feasible.
WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.	Not Applicable. The Project would not impact wetlands.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	Consistent. The Project Site primarily consists of impermeable surfaces as it is fully paved and developed. The Project will not result in a change in the amount of impervious surface area at the Project Site.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	Consistent. The Project will comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would exceed Title 24 standards with compliance with the City's Green Building Ordinance. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce

Policies	Discussion
	waste; and reduce the carbon footprint.
Energy ⁴	
<p>EN-8 Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> ◦ Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. ◦ Land use and planning strategies to increase biking and walking trips. 	<p>Consistent. The Project would be a mixed-use residential and commercial development that is in proximity to Metro rail lines and bus lines, and would encourage biking and walking trips due to bicycle parking and within a pedestrian-oriented area of Downtown Los Angeles.</p>
<p>EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> ◦ Using energy efficient materials in building design, construction, rehabilitation, and retrofit ◦ Encouraging new development to exceed Title 24 energy efficiency requirements. ◦ Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. ◦ Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. ◦ Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. ◦ Encouraging combined heating and cooling (CHP), also known as cogeneration, 	<p>Consistent. The Project would exceed Title 24 standards with compliance with the City’s Green Building Ordinance.</p>

Policies	Discussion
<p>in all buildings.</p> <ul style="list-style-type: none"> • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from renewable energy. 	
<p>EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.</p>	<p>Consistent. The Los Angeles Department of Water and Power was sent a request for information on electricity consumption on June 12, 2013. A response has not been received.</p> <p>The Southern California Gas Company was sent a request for information on natural gas on June 12, 2013. A response was received on July 10, 2013. The Gas Company stated that there are several distribution lines ranging from 1-inch diameter to 4-inch diameter next to the Site in the City right-of-way. At the time of the response, there are no known natural gas service problems or deficiencies in the Project area. The Gas Company stated that it would be able to accommodate the Project’s demand for natural gas service with the existing infrastructure in the area and with existing natural gas supplies.</p>
<p>EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.</p>	<p>Not Applicable. This is an encouragement to incorporate solar panels, not a requirement.</p>
<p>EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.</p>	<p>Not Applicable. The Project has no control over programs such as telecommuting, ridesharing, or alternative work schedules.</p>
<p>Solid Waste ⁵</p>	
<p>SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p>	<p>Consistent. The Project would include a demolition and construction waste recycling program as well as an operational recycling program.</p>

Policies	Discussion
<ul style="list-style-type: none"> • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: <ul style="list-style-type: none"> • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	
<p>SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.</p>	<p>Not Applicable. The Project would not be a composting, or composting, recycling, or conversion technology facility.</p>
<p>SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.</p>	<p>Not Applicable. The Project would not be a waste management facility.</p>
<p>SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.</p>	<p>Not Applicable. The Project would not be an eco-industrial park.</p>
<p>SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.</p>	<p>Not Applicable. The Project would not be a solid waste management facility.</p>

Policies	Discussion
<p>SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf</p> <p>¹ Page 20</p> <p>² Pages 34-39</p> <p>³ Pages 59-61</p> <p>⁴ Pages 75-76</p> <p>⁵ Pages 105-106</p> <p>Table: CAJA Environmental Services, August 2013.</p>	

2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (the “2012-2035 RTP/SCS”). For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region’s residents and visitors. While mobility is a vital component of the quality of life that this region deserves, it is by no means the only component. SCAG has placed a greater emphasis than ever before on sustainability and integrated planning in the 2012–2035 RTP/ SCS, whose vision encompasses three principles that collectively work as the key to the region’s future: mobility, economy, and sustainability.

The 2012–2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS) as set forth by the Federal Clean Air Act. As such, the 2012–2035 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2023–2035 time frame and clear steps to move toward this objective. This is especially critical for our goods movement system. The development of a world-class zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2012–2035 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, greenhouse gas (GHG) reduction, and economic development.

For the first time, the 2012–2035 RTP/SCS includes a significant consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the 2012–2035 RTP/SCS, considering not only the economic and job creation impacts of the direct investment in transportation infrastructure, but also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2012–2035 RTP/SCS outlines a transportation infrastructure investment strategy that will benefit Southern California, the state, and the nation in terms of economic development, competitive advantage, and overall competitiveness in the global economy in terms of attracting and retaining employers in the Southern California region.

The 2012–2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region’s economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its 22 million residents by 2035. More importantly, the RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2012-2035 RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development, and transportation.⁷⁹ It notes, however, that the example measures are “not intended to serve as any kind of checklist to be used on a project-specific basis.” Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

The 2012-2035 RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development in proximity to transit hubs in order to reduce vehicle miles traveled and thereby reduce GHG emissions from personal vehicles. Development of the Project would reduce vehicle miles traveled by providing an infill development of new residential uses in close proximity to existing transit hubs, including Metro rail lines (Blue, Expo, Purple, and Red lines), Metro buses, LADOT DASH, and the downtown employment center. A discussion of the Project’s consistency with the relevant policies in the 2012-2035 RTP/SCS is presented in Table 4.10-3. While the RTP/STS focuses on transportation investments in the SCAG region, as demonstrated, the Project would be consistent with the applicable 2012-2035 RTP/SCS policies.

Goal	Consistency Discussion
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The Project would reduce vehicle miles traveled by providing a higher density infill development of new residential uses in close proximity to existing transit hubs, including Metro rail lines, Metro buses, LADOT DASH line, and the downtown employment center. In addition, the Project would encourage bicycling with the provision of ample bicycle parking. Finally, the Project would promote walkability based on its location downtown, in close walkable distance to jobs and other commercial/retail uses.
Actively encourage and create incentives for energy efficiency, where possible.	Consistent. The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would exceed Title 24 standards with compliance with the City’s Green Building Ordinance. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles

⁷⁹ SCAG, *Final PEIR, 2012-2035 RTP/SCS, Appendix G*, http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.

	Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. The Project would reduce vehicle miles traveled by providing a higher density infill development of new residential uses in close proximity to existing transit hubs, including Metro rail lines, Metro buses, LADOT DASH line, and the downtown employment center. In addition, the Project would encourage bicycling with the provision of ample bicycle parking. Finally, the Project would promote walkability based on its location downtown, in close walkable distance to jobs and other commercial/retail uses.
<p><i>Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2012.</i></p> <p><i>Table: CAJA Environmental Services, November 2013.</i></p>	

Applicability of SCAG Plans

The goals and policies of the Compass Blueprint, RCP, and 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to SCAG criteria (CEQA Guidelines 15206),⁸⁰ as the Project as the project contains less than 500 units (the Project proposes 450 dwelling units). However, as demonstrated in Tables 4.10-1 through 4.10-3, the Project would be consistent with SCAG policies contained in the Compass Blueprint, RCP, and RTP/SCS. As such, impacts would be less than significant.

⁸⁰ Southern California Association of Governments, *Environment, Intergovernmental Review, Criteria List, Minimum Criteria For Classification Of Projects As Regionally Significant*, website: <http://www.scag.ca.gov/igr/clist.htm>, accessed November 4, 2013.

South Coast Air Quality Management District (SCAQMD)

Air Quality Management Plan (AQMP)

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP). The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

While the Project will increase population in the City of Los Angeles by approximately 693 persons, it will not jeopardize the region's attainment of air quality standards.⁸¹ Specifically, the proposed project is consistent with the City of Los Angeles' General Plan, as well as population growth projections used by SCAG's 2012 Adopted Growth Forecast to identify future air quality emissions that must be mitigated through the 2012 AQMP. The Project would represent a negligible percent of the estimated 2013 population and housing units in the City, as listed by the California Department of Finance (2010 baseline based on 2010 Census and 2013 data estimate).⁸²

As a result, the Project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

Los Angeles County Metropolitan Transportation Authority (Metro)

Congestion Management Plan (CMP) for Los Angeles County.

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP.

⁸¹Per CalEEMod 2013.2 forecast by DKA Planning 2013.

⁸² State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2013. Sacramento, California, May 2013: <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>

See Section 16 Transportation and Traffic, question b), in this IS/MND, for a discussion of the CMP. The traffic study provided the following conclusion:

Given the distance between the project site and the surrounding freeways, as well as the anticipated distribution of project trips, the project would contribute well below the 150 directional-trip threshold to all CMP freeway monitoring segments, no significant project impacts to CMP freeway monitoring locations are forecast, and no additional freeway analysis is necessary.⁸³

Consistency with City and Local Plans

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.⁸⁴ The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements.

The General Plan Land Use identifies the Project Site as Regional Center Commercial.⁸⁵

Regional Centers⁸⁶

Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents.

⁸³ *Traffic Impact Study*, Crain & Associates, August 5, 2013, page 56. Included in the Appendices.

⁸⁴ California Government Code Section 65300.

⁸⁵ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System*, search for 400 Broadway, website: <http://zimas.lacity.org/>.

⁸⁶ City of Los Angeles, Chapter 3 – Land Use: <http://cityplanning.lacity.org/cwd/framwkw/chapters/03/03205.htm>

They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities.

Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and well being necessary for ensuring public nighttime use of transit facilities.

They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in the community plan. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services.

Physically, the regional centers are generally characterized by three forms of development:

1. Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages (e.g., Wilshire and Hollywood Boulevards). The intensity of activity and incorporation of retail uses in the ground floor of these structures should induce considerable pedestrian activity.
2. Areas containing mid- and high-rise structures sited on large independent lots, set back from the property frontages (e.g., Warner Center and most of Century City). Though inhibited by the separation of structures, it is encouraged that buildings and sites be designed to improve pedestrian activity within the center.
3. Areas containing retail commercial "malls," characterized by low- and mid-rise buildings clustered around common pedestrian areas. It is encouraged that these buildings be sited and designed to improve their relationships to their principal street frontages, enhancing pedestrian activity.

Table 4.10-3, General Plan for Regional Centers lists the goal, objective, and policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the General Plan for Regional Centers.

The Project's integration of housing and retail uses in a commercially-designated land use area is consistent with the goal and objective of the General Plan Framework for a Regional Center area.

Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.

**Table 4.10-3
General Plan for Regional Centers**

Goal, Objective, Policies	Discussion
<p>Goal 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.</p>	<p>Consistent. The Project would be a mixed-use development (residential and retail) that provides jobs and housing.</p>
<p>Objective 3.12 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.</p>	<p>Consistent. The Project would be the development of a new regional center (building) that provides job opportunities, is accessible through the local and regional transportation system (buses and subway), is compatible with adjacent land uses (other residential and retail buildings, including mid- and high-rises), and would enhance the urban pedestrian experience along Broadway and 4th Street with a design compatible with the Broadway Community Design Overlay.</p>
<p>Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.</p>	<p>Consistent. Table 3-1 describes land use standards and typical characteristics/uses. The Project is Regional Center Commercial and would be a mixed-use structure integrating housing with commercial uses. Regional Centers generally will fall within the range of floor area ratios from 1.5:1 to 6.0:1, characterized by six- to 20-stories (or higher) buildings. Some will only be commercially oriented; others will contain a mix of residential and commercial uses.</p> <p>The Project would have an FAR of 11.8:1 and contain 34 stories. The Project is requesting up to 150,000 square feet of floor area from the Convention Center to the Project. According the Community Plan, the Regional Commercial has a D limitation to 6:1 FAR, except for transfer of floor area up to 13:1 (with -4D zone designation). The Project is zoned C4-4D-CDO.</p> <p>Table 3-6 refers to Regional Center Land Use Designation and the C4 zoning, which applies to the Project Site.</p>
<p>Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.</p>	<p>Consistent. The Project would accommodate and encourage multi-modal transit, including walking (walkable Downtown area), biking (onsite bicycle parking) driving (onsite vehicle parking), and mass transit (nearby buses and subway).</p>
<p>Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers.</p>	<p>Consistent. The Project would increase the density on the Site, including new residents that would induce pedestrian activity. The frontage along Broadway and 4th Street would be retail uses. Parking would be in the rear, above, and below street-fronting uses (retail) and accessed via a driveway at the edge of the Site at 4th Street and along the rear alley of Frank</p>

Goal, Objective, Policies	Discussion
	Court.
<p>Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.</p>	<p>Consistent. The Project would not conflict with any City plan's for public streetscape improvements along the public right-of-way.</p>
<p>Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.</p>	<p>Not Applicable. The Project does not include small parks or pedestrian-oriented plazas. However, post-dedication, the sidewalk along Broadway would be wider and the City can decide to implement streetscape and sidewalk furniture and landscaping.</p>
<p>Policy 3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and use.</p>	<p>Consistent. The Project would include safety and security lighting to facilitate nighttime access and use. The outdoor lighting shall be designed and installed with shielding to minimize light trespass and light pollution to adjacent uses.</p>
<p>Source: City of Los Angeles, Chapter 3 – Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm Table: CAJA Environmental Services, September 2013.</p>	

Central City Community Plan

The Central City Community Plan, part of the City's General Plan Land Use Element, sets forth specific land use requirements and required entitlements for projects within the area of the City, where the Project Site is located.

The City of Los Angeles General Plan contains goals, numerous policies and objectives to guide development and uses planned within the City. Not every goal, policy, or objective in the Community Plan is applicable to the Project or the Project Site.

Purposes

The Community Plan purpose is to:⁸⁷

1. Creates residential neighborhoods; while providing a variety of housing opportunities with compatible new housing.
2. Improves the function, design and economic vitality of the commercial districts.
3. Preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
4. Maximizes the development opportunities of the future rail transit system while minimizing adverse impacts.
5. Plans the remaining commercial and industrial development opportunity sites for needed job producing uses that improve the economic and physical condition of the Central City Community.

Purposes 1 and 2 can be applied to this Project. The Project would create a residential use with a range of housing choices (studio, 1, and 2-bedroom). The Project is an urban infill redevelopment of an underutilized and single-use prominent corner of Downtown Los Angeles. The area is a transition between residential uses and converted lofts in the Historic Core and the commercial uses of Bunker Hill.

The existing use does not create a community identity due to its small scale, unadorned façade and appearance and unspecialized use (retail and restaurant). Thus, there is no incentive to preserve and enhance the existing use (Purpose 3)

Purpose 4 applies as the Project would increase the density of the area, including substantial new residents, who would support the existing Metro Rail station and the future Regional Connector and Broadway Streetcar.

⁸⁷ Central City Community Plan, page II-2: <http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF>

Purpose 5 applies as the Project would create a new commercial and residential development opportunity. The immediate area is a mix of commercial, retail, office, civic, and residential uses so an industrial use is not appropriate.

Goals

The Community Plan does not list itemized goals, but rather defines goals within the following contexts:⁸⁸

- Having residents live and work in the community will foster one of Central City's primary goal which is the establishment of an active 24-hour downtown.
- The ultimate goal of the Central City Community Plan is to create an environment conducive to conducting business and actively promote Downtown Los Angeles as the economic center for the region and California.

The Project would provide residents to live and work in the community, and establish longer hours of activity at the corner of Broadway and 4th Street, which currently has retail uses that are not particularly active after sundown. The Project would also generate economic activity by increasing the density of uses on site, increasing the local population of consumers and spenders, and providing residents access to the regional transportation network to support other areas of Los Angeles.

Table 4.10-4, Central City Community Plan, sets forth the Community Plan objectives and policies and discusses the Project's consistency and applicability with each of them.

Some of the objectives and policies are directed toward the City (government and public facilities), and the various departments and agencies within, such as open space and recreation (Department of Recreation and Parks), Police Protection (LAPD), Fire Protection (LAFD), Schools/Education (LAUSD), Libraries (LAPL), social services (public and non-profit). As noted in the table below, certain policies do not relate to individual private projects and are not applicable to this Project. The Project would be consistent with all applicable policies related to the buildings siting, location in Downtown, uses, and design features.

⁸⁸ Central City Community Plan, page I-17: <http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF>

**Table 4.10-4
Central City Community Plan**

Objectives and Policies	Discussion
Residential	
Objective 1-1 To promote development of residential units in South Park.	Not Applicable. The Project Site is not located in South Park.
Policy 1-1.1 Maintain zoning standards that clearly promote housing and limit ancillary commercial to that which meets the needs of neighborhood residents or is compatible with residential uses.	Not Applicable. The Project Site is not located in South Park.
Objective 1-2 To increase the range of housing choices available to Downtown employees and residents.	Consistent. The Project would provide 450 residential units in a range of sizes (studio, 1-, and 2-bedroom units).
Policy 1-2.1 Promote the development of neighborhood work/live housing.	Not Applicable. The Project does not include live/work housing. However, the Project would not preclude the promotion or development of other areas that would include work/live housing.
Objective 1-3 To foster residential development which can accommodate a full range of incomes.	Consistent. The Project would provide 450 residential units in a range of sizes (studio, 1-, and 2-bedroom units). These would be priced according to size and other characteristics, allowing for a range of income levels.
Policy 1-3.1 Encourage a cluster neighborhood design comprised of housing and services.	Consistent. The Project would provide housing in an area that already includes residential housing, such as the adjacent Judson apartment building, and the historic lofts along Spring Street and 4 th Street.
Objective 1-4 To facilitate the conversion of historic buildings in the Historic Core to housing, office, art, and cultural uses in order to attract new residents.	Not Applicable. The Project does not include a historic building.
Policy 1-4.1 Encourage the rehabilitation and adaptive reuse of historic buildings for housing, artist lofts and live-work units.	Not Applicable. The Project does not include a historic building.
Objective 1-5 To preserve the existing low-income housing stock, including single room occupancy (SRO) units.	Not Applicable. The Project Site does not contain existing housing. The Project would add 450 housing units, but not SRO units.
Policy 1-5.1 Monitor the supply of low-income housing stock to guard against loss of units through demolition, conversion, and deterioration of units.	Not Applicable. The Project Site does not contain existing housing and would not result in the loss of any existing housing.
Objective 1-6 To support additions to the housing stock in Little Tokyo.	Not Applicable. The Project Site is not in Little Tokyo.
Policy 1-6.1 Encourage housing for all income levels in Little Tokyo.	Not Applicable. The Project Site is not in Little Tokyo.
Commercial	
Objective 2-1 To improve Central City's competitiveness as a location for offices,	Consistent. The Project would include new retail space in a modern building.

Objectives and Policies	Discussion
business, retail, and industry.	
Policy 2-1.1 To reinforce Bunker Hill and the Financial Core Districts as dominant centers for legal, financial and other corporate services for Southern California and the Pacific Rim.	Not Applicable. The Project would not conflict with Bunker Hill and the Financial Core Districts uses.
Policy 2-1.2 To maintain a safe, clean, attractive, and lively environment.	Consistent. The Project would maintain a safe, clean, and attractive building.
Objective 2-2 To retain the existing retail base in Central City.	Consistent. The Project would include retail uses.
Policy 2-2.1 Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force, and businesses.	Consistent. The Project would include new retail space in a modern building that could attract new businesses.
Policy 2-2.2 To encourage pedestrian-oriented and visitor serving uses during the evening hours especially along the Grand Avenue cultural corridor between the Hollywood Freeway (US 101) and Fifth Street, the Figueroa Street corridor between the Santa Monica Freeway (I-10) and Fifth Street and Broadway between Third Street and Ninth Street.	Consistent. The Project would include new retail space for pedestrians and visitors. The hours of operation (into the evening) is not known at this time.
Policy 2-2.3 Support the growth of neighborhoods with small, local retail services.	Consistent. The Project would include new retail space for the local area.
Objective 2-3 To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.	Not Applicable. The Project Site is not near the major hotels and convention center of South Park.
Policy 2-3.1 Support the development of a hotel and entertainment district surrounding the Convention Center/Staples Arena with linkages to other areas of Central City and the Figueroa corridor.	Not Applicable. The Project Site is not near the major hotels and convention center of South Park.
Objective 2-4 To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.	Consistent. The Project includes a mix of uses (retail and residential) that would activate the area longer than typically during the day from a single, retail use.
Policy 2-4.1 Promote night life activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.	Consistent. The Project includes residential that would provide a economic base to support night life activity.
Objective 2-5 To increase specialty and ethnic markets in order to foster a diverse range of retail and commercial uses in Central City.	Not Applicable. The Project Site existing use was not a specialty or ethnic market, nor would the Project. The retail uses could include items that specialize in specialty or ethnic markets, but it is unknown at this time.
Policy 2-5.1 Make Downtown a tourist destination by combining its cultural and commercial offerings with those of the ethnic communities surrounding it.	Not Applicable. The Project would not conflict with hotels that support tourists seeking cultural and commercial offerings.
Industrial	
Objective 3-1 To strengthen, retain and expand the existing industrial base as well as attract new industries to the Central City Area.	Not Applicable. The Project is not located in an industrial area and has not existing or proposed industrial uses.

Objectives and Policies	Discussion
Policy 3-1.1 Maintain and expand the toy, garment, small electronics, and other import/export wholesale industries.	Not Applicable. The Project is not located in the wholesale industry area.
Policy 3-1.2 Encourage development and public improvements in the Fashion District and South Markets area that enhance the pedestrian environment, improves pedestrian circulation within the area and provides pedestrian linkages to other downtown activity centers, particularly the Broadway retail and theater district.	Not Applicable. The Project is not located in the Fashion District
Policy 3-1.3 Encourage the refurbishment of the old produce terminal for more efficient wholesale activities and office uses.	Not Applicable. The Project is not located in the old produce terminal.
Objective 3-2 To study the possibility of developing “artist-in-residence” districts, where appropriate and feasible, in industrial areas where the development of joint live/work units would continue to improve the jobs/housing ratio, respond to market demands, complement surrounding uses and maintain and enhance the viability of industrial lands as the space needs of manufacturers evolve.	Not Applicable. The Project is not located in an industrial area.
Open Space and Recreation	
Objective 4-1 To encourage the expansion and additions of open spaces as opportunities arise.	Consistent. The Project would include open space for residents, including terraces, communal, and private balconies on the tower levels.
Policy 4-1.1 Review existing open space standards in order to expand the range of potential open space resources at the neighborhood and community levels.	Not Applicable. The Project is not a governing agency to review open space standards.
Objective 4-2 To maximize the use of the City’s existing and envisioned open space network and recreation facilities by providing connections to the open space system.	Consistent. The Project would provide residents to an area that could use the nearby open spaces, parks, and recreation centers.
Policy 4-2.1 To foster physical and visual links between a variety of open spaces and public spaces Downtown.	Not Applicable. The Project is surrounded by buildings and streets and does not create or block physical or visual links to open space.
Objective 4-3 To encourage increased use of existing park and recreational spaces.	Not Applicable. The Project is not a governing agency to increase use of parks.
Policy 4-3.1 Review existing park and recreational space usage in order to determine factors impacting low use of certain facilities.	Not Applicable. The Project is not a governing agency to review parks and recreation space usage.
Objective 4-4 To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.	Not Applicable. The Project is not a governing agency that could create traditional and non-traditional sources of open space.
Policy 4-4.1 Improve Downtown’s pedestrian environment in recognition of its important role in the efficiency of Downtown’s transportation and circulation systems and in the quality of life for its residents, workers, and visitors.	Not Applicable. The Project cannot affect offsite, right-of-way areas for pedestrian circulation. The Project would create a pedestrian-friendly façade and retail uses.

Objectives and Policies	Discussion
Police Protection	
Objective 5-1 To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.	Consistent. The LAPD was contacted about the Project and provided an informational response on July 26, 2013. The Project includes mitigation measures to reduce police impacts.
Policy 5-1.1 Consult with the Police Department as part of the review of significant development projects and General Plan amendments affecting land use to determine the impact on law enforcement service demands.	Consistent. The LAPD was contacted about the Project and provided an informational response on July 26, 2013. The Project includes mitigation measures to reduce police impacts.
Policy 5-1.2 Promote the establishment of Police facilities and programs which provide police protection at a neighborhood level.	Not Applicable. The Project is not a governing agency that can establish police facilities.
Objective 5-2 To inform developers, design professionals, and the public of the possible reduction of criminal opportunities when crime prevention principles are developed during the initial planning stages of a development.	Consistent. The LAPD was contacted about the Project and provided an informational response on July 26, 2013. The Project includes mitigation measures to reduce police impacts, including crime prevention design features.
Policy 5-2.1 Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.	Consistent. The LAPD was contacted about the Project and provided an informational response on July 26, 2013. The Project includes mitigation measures to reduce police impacts, including crime prevention design features.
Fire Protection	
Objective 6-1 To ensure that fire facilities and protective services are sufficient for the existing and future population and land uses of Central City.	Consistent. The LAPD was contacted about the Project and provided an informational response on June 28, 2013. The Project includes a mitigation measure to reduce fire impacts.
Policy 6-1.1 Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	Consistent. The LAPD was contacted and provided an informational response on June 28, 2013. The Project includes a mitigation measure to reduce fire impacts.
Schools/Education	
Objective 7-1 To site schools in locations complementary to existing land uses, recreational facilities, and community identity and as a re-use of historic structures.	Not Applicable. The Project is not a governing agency that can site schools.
Policy 7-1.1 Encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character and, as appropriate, use schools to create a logical buffer between different land uses.	Not Applicable. The Project is not a governing agency that can influence school locations, layouts, and design.
Policy 7-1.2 Pursue planning and building code changes allowing the reuse of existing buildings for educational purposes.	Not Applicable. The Project is not a governing agency that can influence planning and building code changes for reuse of existing buildings as educational purposes.

Objectives and Policies	Discussion
Libraries	
Objective 8-1 To assist the City Library Department in providing adequate library service which responds to the needs of the community.	Consistent. The LAPL was contacted about the Project and provided an informational response on August 1, 2013.
Policy 8-1.1 Encourage flexibility in siting libraries in mixed use projects, pedestrian oriented areas, transit oriented districts, and similarly accessible facilities.	Not Applicable. The Project is not a governing agency that can site libraries.
Social Services	
Objective 9-1 To address the problems of the homeless population by creating a mix of policies, services and facilities that better serve their needs.	Not Applicable. The Project is not a governing agency or social service provider that can address the homeless population.
Policy 9-1.1 Preserve the existing affordable housing stock through rehabilitation and develop new affordable housing options.	Not Applicable. The Project Site does not contain existing housing.
Objective 9-2 To provide the requisite services, housing opportunities, and community environments to allow the homeless to rejoin the workforce and lead more productive lives.	Not Applicable. The Project is not a governing agency or social service provider that can address homeless services.
Policy 9-2.1 Establish a physical infrastructure capable of supporting a variety of human services, employment, residential and recreational opportunities for Central City East and other Downtown residents.	Not Applicable. The Project is not a governing agency or social service provider for human services, employment or recreational opportunities. The Project would include residential units.
Policy 9-2.2 Provide opportunities for daytime activities for the neighborhood including day centers, job-training centers, libraries, etc. Provide programmed and managed open spaces for recreational, cultural and survival needs including restroom and storage facilities.	Not Applicable. The Project is not a governing agency or social service provider that is required to provide daytime activities such as daycare, job training, or libraries.
Policy 9-2.3 Provide free, secure, well-monitored, permanently plumbed toilets near residential and commercial areas throughout Downtown.	Not Applicable. The Project is not a governing agency or social service provider that is required to provide public toilets.
Policy 9-2.4 Establish a shuttle system which can connect people with services both inside and outside the neighborhood.	Not Applicable. The Project does not have a transportation impact that would create a nexus to support a shuttle system.
Policy 9-2.5 Coordinate among law enforcement, public agencies and social service providers to establish homeless services and programs that harmonize the provision of such services with the safety, cleanliness and quality-of-life concerns of the growing downtown residential community, visitor and tourism industry and myriad commercial and manufacturing businesses.	Not Applicable. The Project is not a governing agency or social service provider that can address homeless services.
Policy 9-2.6 Establish a town center or "common" that provides an open space, retail and other neighborhood services.	Consistent. The Project would include retail spaces, but is not required to provide public open space. There would be private open space for residents.

Objectives and Policies	Discussion
Arts, Culture, and Architectural History	
Objective 10-1 To ensure that the arts, culture, and architecturally significant buildings remain central to the further development of downtown and that it remains clearly discernible and accessible to all citizens in and visitors to Los Angeles.	Not Applicable. The Project is not a governing agency or cultural institution that is required to ensure the arts, culture, and aesthetical significant buildings are noticed. The Site does not contain a historic or cultural resource.
Policy 10-1.1 Promote the development of a "Cultural Corridor" along Grand Avenue and the First Street/Broadway "Arts T" as well as other complimentary visitor serving uses.	Not Applicable. The Project is not located along Grand Avenue and the First Street/Broadway Cultural Corridor.
Policy 10-1.2 Promote the development of the night-time entertainment uses in the historic Broadway theater district.	Not Applicable. The Project Site existing use does not contain night-time entertainment so the Project would not create a loss of night-time uses.
Policy 10-1.3 Ensure that the Downtown circulation system serves the existing arts and cultural facilities with ease of accessibility and connections.	Not Applicable. The Project is not a governing agency that influence the circulation system (transportation and mobility)
Objective 10-2 To maintain and reuse one of the largest and most distinguished sets of under used historic buildings in the United States.	Not Applicable. The Project Site does not contain a historic building.
Policy 10-2.1 Clearly designate those historic buildings which should be preserved and prioritized for available funding. Encourage both their rehabilitation and/or adaptive reuse and the development of adjacent available sites.	Not Applicable. The Project Site does not contain a historic building.
Policy 10-2.2 Adopt building, safety and zoning ordinances to respond to existing building conditions and to ensure predictability in the code's applications.	Not Applicable. The Project is not a governing agency that can adopt building, safety and zoning ordinances.
Policy 10-2.3 Establish district-specific preservation policies and programs consistent with the goals of each area. Encourage a mix of uses in developing adaptive reuse projects.	Not Applicable. The Project is not a governing agency that can establish district-specific preservation policies. The Project is not an adapted reuse project.
Policy 10-2.4 Facilitate the construction of parking garages to support new and existing buildings in the Center City, encouraging shared parking between new development and historic buildings.	Consistent. The Project would include a new parking garage to serve the buildings' commercial and residential, visitors, guests, and employees.
Policy 10-2.5 Encourage the transformation of Broadway Downtown to include the adaptive reuse of historic buildings for arts, cultural, entertainment, restaurant and retail uses as well as infrastructure improvements such as sidewalk rebuilding and streetscape and landscape improvements in conjunction with major public transit expenditures.	Not Applicable. The Project Site does not contain a historic building or would be an adaptive reuse. The Project is not in conjunction with a major public transit expenditure.
Policy 10-2.6 Encourage the reuse of historic buildings as live/work offices, housing, retail, and educational facilities.	Not Applicable. The Project Site does not contain a historic building.
Policy 10-2.7 Utilize historic buildings to accommodate office space within the Civic	Not Applicable. The Project Site does not contain a historic building nor is it within

Objectives and Policies	Discussion
Center boundaries.	the Civic Center boundaries.
Policy 10-2.8 Encourage the location of new government uses in historic buildings within the Civic Center boundaries.	Not Applicable. The Project Site does not contain a historic building nor is it within the Civic Center boundaries.
Policy 10-2.9 Encourage an historic building advocacy office whose goal is to revitalize Downtown's historic districts and other historic structures at and above street level.	Not Applicable. The Project is not a governing agency or cultural institution, non-profit that would establish a historic building advocacy office.
Policy 10-2.10 Provide one-stop technical assistance to property owners tenants, developers and designers to expedite approvals and negotiate code compliance.	Not Applicable. The Project is not a governing agency that could provide technical assistance to expedite approvals and negotiate code compliance.
<p>Source: Central City Community Plan, pages III-1 to III-18: http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF Table: CAJA Environmental Services, September 2013.</p>	

Broadway Theater and Entertainment District Design Guide Community Design Overlay⁸⁹

Ordinance No. 180,871 became effective on October 26, 2009, establishing the Broadway Theater and Entertainment District Design Guide [Community Design Overlay (CDO)].

The Ordinance established the boundaries of the CDO and the [Q] conditions imposed upon each property within. As shown in Table 4.10-5, below, the Project complies with the building form and massing, the parking location (in the rear, underground, and enclosed within a structure), and the ground-floor heights as well as all other applicable design guidelines. The Project has requested relief from the [Q] condition requiring a minimum floor to ceiling height of 15 feet on the ground floor, for a small portion of one retail space.

Table 4.10-5, Broadway Theater and Entertainment District Design Guide, lists the Project's consistency with all applicable guidelines and standards from the Guide. The applicable areas are New Construction, Signs, Landscaping, and Sustainability.

The goals of the Design Guide are:

- Create a recognizable and attractive entertainment district on Broadway that enlivens the corridor, serves as a regional entertainment draw and encourages the reuse of its numerous historic theaters;
- Promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows and tourism;
- Encourage the location of entertainment-related uses in the district, including, but not limited to: restaurants, cafes, hotels, bars, cabarets, clubs, museums, and live theater to create a cohesive entertainment district that is anchored by the corridor's historic theaters;
- Encourage reuse of all historic buildings on Broadway for entertainment, retail, commercial, office, residential and other appropriate uses;
- Encourage development patterns and a mix of uses that contribute to a pedestrian-friendly environment on Broadway and promote an active street life 24 hours a day, with an emphasis on night-time and entertainment uses for residents, workers, visitors and tourists;
- Encourage pedestrian-oriented and visitor-serving uses during the evening hours to expand activity centers within Downtown and create better, safer linkages among Downtown districts;

⁸⁹ *Broadway Theater and Entertainment District Design Guide for the Community Overlay Zone, effective 10-26-09: <http://cityplanning.lacity.org/complan/othrplan/pdf/broadway.pdf>*

- Preserve architecturally significant buildings by ensuring appropriate rehabilitation of those buildings that contribute to the Broadway Theater and Commercial National Register Historic District, in accordance with the Secretary of the Interior Standards;
- Provide guidelines for appropriate design of infill development that will be complementary to and enhance the Broadway Theater and Commercial National Register Historic District;
- Ensure that any potential infill projects maintain the urban form of Broadway, in particular, by reinforcing the existing streetwall;
- Promote projects that are designed to ensure compatibility among the wide range of uses encouraged in the district and which incorporate measures that help diminish noise, improve energy efficiency and mitigate other potential impacts;
- Promote outdoor dining, including sidewalk dining on the ground floor and reuse of basements and upper floors, including the roof, as appropriate;
- Encourage development that contributes to the safety and comfort of Downtown residents and visitors.⁹⁰

The design principles of the Design Guide are:

1. Activity
2. Context
3. Compatibility
4. Interest
5. Quality
6. Maintenance
7. Sustainability⁹¹

The Project would activate and enliven the Broadway corridor with new retail and new residents. The Project would be a new development that provides a mix of uses, is pedestrian-friendly along the street frontages, and promotes activity over longer hours (due to residents in the morning and evening). The

⁹⁰ Broadway Design Guide, pages 5-6: <http://cityplanning.lacity.org/complan/othrplan/pdf/broadway.pdf>

⁹¹ Broadway Design Guide, page 6: <http://cityplanning.lacity.org/complan/othrplan/pdf/broadway.pdf>

Project Site does not contain a historic structure due to its recent age (1985) and would be an infill development completely surrounded by complementary urban uses (retail and residential). The Project includes mitigation measures and other code-required features that diminish noise, improve energy efficiency, and mitigate any other potential impacts. The Project would contribute to the safety and comfort of the area with a new building designed with LAPD and LAFD standards, including secure facilities, and lighting.

Table 4.10-5

Broadway Theater and Entertainment District Design Guide

Guidelines and Standards	Discussion
New Construction	
1. Respect the Historic Context	
<p>Guideline 1: Pursue creative and innovative contemporary designs for new buildings that will complement Broadway's designated National Register Historic District.</p>	<p>Consistent. As mitigated, the Project is considered to be consistent with The Secretary of the Interior's Standards for Rehabilitation, the threshold for evaluating whether projects are compatible to existing historic buildings and structures and for determining whether a proposed project, under CEQA would cause a significant impact to a historical resource, wherein pursuant to Section 15064.5 of the CEQA Guidelines, if a proposed project can be considered to meet <i>The Standards</i>, that project's impacts will be considered less than significant. Because the proposed project design meets <i>The Standards</i> it is considered to respect the historic context of the Broadway District, and by extension the adjacent Spring Street District.</p> <p>The project design is complimentary to the three main features of the historic district in that it maintains the common setback throughout the Broadway District by abutting the sidewalk, it incorporates terra cotta wall finishes – a material specifically referenced in the Broadway District National Register nomination, and includes street-level storefronts. To account for the proposed visible height of the building at 34 floors above the street level, the proposed design incorporates a setback at the 11th floor which would result in a compatible scale and height with surrounding street walls of the typical 13-story buildings within the District.</p> <p>The project design includes two enhanced cornices with corbels and brackets, of terracotta construction – one at the 10-story building base / podium and one at the top of the building.</p>
<p>Standard 1a: New construction shall continue the pedestrian-oriented, mixed-use pattern of development characteristic of Broadway. Building massing, placement and entryways shall be</p>	<p>Consistent. The Project would contain a pedestrian-oriented, mixed-use (retail and residential) building with ground floor-retail. The building</p>

Guidelines and Standards	Discussion
functionally and aesthetically compatible with their surroundings.	massing would contain an appropriate setback in the tower element. The entryway for residents would be on Broadway and there would be multiple entrances to the retail on 4 th and Broadway.
Standard 1b: Development of large sites should respect the traditional lot patterns, vertical rhythms, horizontal building forms as well as maintain the tradition of articulated, transparent storefronts and storefront entryways and prominent main building entries on the ground floor facing a public street.	Consistent. The Project would respect the lot pattern (rectangular-shaped). The area is a mix of low, mid, and high rise buildings and the Project would contain horizontal and vertical design elements to create a matching rhythm and context with the surroundings.
Standard 1c: New construction shall be differentiated from the old yet be compatible with the historic materials, scale, massing and proportions that characterize the historic district and shall otherwise comply with the Secretary of Interior Standards for new construction and additions.	Consistent. As mitigated in Section I., the Project will be compatible with and not conflict with the historic materials, scale, massing, and proportions of the historic district. The podium levels of the building will be roughly even with the adjacent Judson Building.
2. Building Orientation and Frontage	
Guideline 2: Site buildings to promote pedestrian activity along the public right-of-way by placing business entrances on the street. Developments should not face inward but rather should be oriented towards the street to reinforce the existing character of the Broadway Corridor.	Consistent. The Project is intended for construction at the corner of 4 th and South Broadway in downtown Los Angeles with ground floor retail to support a pedestrian presence and storefronts that open up to the sidewalks at Broadway and 4 th Streets. All public spaces are accessible from the Broadway and 4 th Street openings, with retail support spaces, and the building lobby (for residents) sited in the center of the ground floor.
Standard 2a: Buildings shall be built to the front property line to continue and reinforce the existing streetwall. If consistent with the existing development pattern, the main structural elements of new buildings shall maintain the existing streetwall but may have recessed storefronts and building entryways.	Consistent. The Project will be built to the front property line on Broadway to reinforce the existing streetwall, which includes the adjacent Judson Building.
Standard 2b: Corner buildings shall be built to front and side lot lines with allowances for a visibility triangle as required by Chapter 1, Section 12.21 C.7 of the Los Angeles Municipal Code (LAMC). At major street intersections, buildings may have corner entrances that emphasize the location of the building at the intersection.	Consistent. The Project is located on the corner of Broadway and 4 th Street and includes a triangle, or curved building corner.
Standard 2c: Surface parking lots shall not be located between the front property line and the building on the street side but rather to the rear of all structures.	Consistent. There would be no surface parking lot.
Standard 2d: All new buildings shall have a minimum floor-to-ceiling height of 15 feet for 100-	Consistent. The majority of the Project first floor would have a 20'-0"

Guidelines and Standards	Discussion
percent of the ground floor as measured from sidewalk grade.	height. The Project has requested a zone change to allow one section of the ground floor to have a lower floor to ceiling height.
Standard 2e: All new buildings shall have a primary entrance which shall be oriented toward the street on all street-facing facades. The primary entrance shall be prominent and easy to locate. It should be distinguished from storefront entrances and highlighted through the use of articulation or other architectural treatment (such as enlarged entryways, appropriately scaled signage or lighting).	Consistent. The Project's primary entrance will be on Broadway, oriented toward the street. The entrance will contain a slight building cut inwards to indicate the prominent entrance.
Standard 2f: Each retail space or storefront should be accessible directly from the sidewalk and/or from a publicly accessible walkway (paseo, arcade, etc.), rather than through common interior lobbies.	Consistent. The retail spaces will be accessible directly from the sidewalk along 4 th Street and Broadway.
Standard 2g: Where a building extends through an entire block or is located at a corner, the entrances shall be connected with a suitably scaled public lobby.	Consistent. The Project is located at a corner. The residential entrance on Broadway is connected to a lobby.
Standard 2h: Line large expanses of unused linear street frontage with shallow storefronts or veneers.	Consistent. The Project linear street frontage will contain multiple storefronts and other building articulations.
Standard 2i: Accessory parking structures shall be located to the rear of the site, whenever feasible, and shall be visually compatible with other structures associated with the project, in terms of material, color, design and other elements.	Consistent. Parking at the ground level would be contained to the rear of the building. There would be subterranean parking levels that would not be visible. The above ground parking levels would be within the building structure and not exposed visually to the outside.
Standard 2j: New freestanding parking structures on Broadway and any perpendicular streets shall be prohibited, unless designed with retail uses at the ground floor at a minimum depth of 25 feet. Parking structures shall additionally be screened so as to disguise their use. The exterior of parking structures shall consist of architectural cladding that provides proportion, rhythm and scale for the purpose of creating an architectural facade on all street-facing facades. Particular attention should be paid to fenestration.	Not Applicable. The Project would not be a free-standing parking structure. Rather, the parking structure would be part of the podium wrapped with residential and retail uses, and topped with a residential tower.
3. Setbacks	
Guideline 3: Encourage an inviting pedestrian environment and provide for streetwall continuity by locating new buildings at the property line or the prevailing setback, as applicable. Where permitted, additional setback areas should encourage active public uses through additional street trees, outdoor seating areas, kiosks, forecourts and arcades.	Consistent. The Project design maintains continuity of surrounding historic buildings by situating the new building up to the property line. Refer to Guideline 1 for additional discussion.
Standard 3a: Breaks in the streetwall shall be limited to those necessary to accommodate pedestrian passageways (paseos, arcades, etc.), public plazas, necessary vehicular access driveways and hotel	Consistent. The streetwall will contain breaks necessary for pedestrian access to the residential lobby and retail uses, and for the residential

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drop-offs.	driveway on 4 th Street, near Frank Court alley.
Standard 3b: Limited portions of buildings may be setback from the lot line when the setback area is used for publicly accessible patios, plazas, courtyards, outdoor dining, seating, kiosks, and/or landscaping. In such instances, structural columns and building walls above the ground floor shall be located at the property line or prevailing setback, as applicable applies.	Not Applicable. There would be no other setbacks for patios, plazas, courtyards, outdoor dining, or other uses.
Standard 3c: Buildings (or building additions) shall be built to the property line abutting a public street above the ground floor and up to a minimum of 100 feet but no more than 150 feet above the sidewalk grade.	Consistent. The building will be built to the property line. The tower element begins on Floor 12.
Standard 3d: South of Fourth Street, the portion of building above 150 feet (as permitted by tower standards) shall be setback a minimum of 30 feet from Broadway and any perpendicular street.	Consistent. The building portion above 150 feet will be setback a minimum of 30 feet from Broadway (44 feet) and 4 th Street (47 feet).
Standard 3e: When constructing a tower, the portion of the building above 150 feet shall include a lot coverage of no less than 30-percent and not more than 40-percent of lot coverage which can include the minimum 30-foot setback when a 30-foot setback is required. Note: Projects incorporating uses or structures in the existing public right-of-way, such as sidewalk dining or awnings, must obtain proper approval from the Department of Public Works Bureau of Engineering. A Revocable Permit (R-Permit) may be necessary to grant conditional encroachment of the public right-of-way by private parties not authorized to occupy the right-of-way. This does not apply to projects that remain solely on private property or within setback areas.	Consistent. The building portion above 150 feet will include a lot coverage between 30 and 40 percent. The tower element has a foot print of 13,117.80 square feet and a lot area of 37,529 square feet. Thus a percentage of 35 percent.
4. Open Space	
Guideline 4: Encourage publicly accessible, urban open spaces as part of a project site design to invite and encourage pedestrian activity. Create inviting spaces, provide shade, screen unattractive areas, and enhance architectural detailing through the thoughtful and careful placement of landscaping. Paseos and arcades should accommodate pedestrian traffic and offer opportunities for amenities such as outdoor dining, sitting areas, and landscaping. The arcade presents the opportunity for pedestrian-oriented retail.	Consistent. Pedestrian oriented retail is presented in the Project design with shops that open to the Broadway and 4 th Street sidewalks.
Standard 4a: Paseos and arcades should be strategically located at regular intervals to create pleasant and inviting passageways that are safe, accessible and connect areas of pedestrian activity. Wherever a project has contiguous Broadway street frontage of 300 feet or greater, pedestrian access or an arcade shall be provided from the rear of the building to the front property line of the building.	Not Applicable. The Project does not have a contiguous Broadway street frontage of 300 feet or greater. The frontage is approximately 240 feet.

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<p>Standard 4b: A paseo shall:</p> <ul style="list-style-type: none"> i. Be at least 15 feet wide at a minimum and 20 feet wide on average; ii. Provide, or in the case of projects that do not consist of through lots, enable a continuous connection from street to street iii. Have a clear line of site to the back of the paseo, gathering place, or focal element; iv. Be at least 50-percent open to the sky or covered with a transparent material; v. Be lined with ground floor spaces designed for retail, especially restaurants, and/or entertainment and cultural uses along at least 50-percent of its frontage; and vi. Include at least one gathering place with a fountain or other focal element. 	<p>Not Applicable. The Project is not required to create a paseo as it does not have 300 feet or more of Broadway street frontage.</p>
<p>Standard 4c: An arcade shall:</p> <ul style="list-style-type: none"> i. Be at least 15 feet wide at a minimum and 20 feet wide on average; ii. Have a minimum of a 20 foot opening and a minimum interior height of 30 feet; iii. Be lined with ground floor spaces designed for retail, especially restaurants, and/or entertainment and cultural uses along at least 50-percent of its frontage. 	<p>Not Applicable. The Project is not required to create an arcade as it does not have 300 feet or more of Broadway street frontage.</p>
<p>Standard 4d: When breaks in the streetwall are necessary to provide publicly accessible open spaces, paseos, arcades etc., design or architectural features shall be used to define the street edge at any property line abutting a public street. Where the open space is open to the sky, design techniques may include decorative walls, arches or gates at the property line on the ground floor. For those spaces that are not open to the sky, another technique to define the streetwall is to construct the upper stories to any property line abutting a public street or the prevailing setback, as applicable. In all cases, such design features at the ground floor shall be open, transparent and readily permit visual and physical access to the open space or passageway from the abutting public right-of-way.</p>	<p>Not Applicable. The Project is not required to create a publicly accessible space, paseo, or arcade as it does not have 300 feet or more of Broadway street frontage.</p>
<p>Standard 4e: Rooftop decks are encouraged and should be architecturally integrated through the use of building materials, color, texture, shape, size and other architectural features. As may be required by the Fire Department and the Department of Building and Safety, rooftop decks should be enclosed by a wall or railing that complements the architectural features of the building. Any rooftop deck railings and/or rooftop enclosures should be of an open framework or lattice design to maximize transparency and shall be subject to review.</p>	<p>Consistent. The Project includes rooftop deck or open space terraces on Floor 7, Floor 11, and the roof level. The Project will comply with the Fire Department and Department of Building and Safety requirements for enclosures.</p>
<p>5. Corporate Identify Architecture</p>	

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<p>Guideline 5: Buildings in the District should contribute to the architectural integrity of the surrounding area. Buildings used for franchise restaurants, retail space or other formula commercial uses that traditionally have a pre-determined corporate architectural identity may not be compatible with these guidelines. In such cases, buildings shall be redesigned so as to be consistent with these Design Guidelines and Development Standards.</p>	<p>Not Applicable. No specific corporate identity has been integrated into the Project design because the new building would be residential in nature with commercial-retail at the ground floor.</p>
<p>Standard 5: All projects, including those related to franchise or corporate establishments shall be designed to comply fully with the Design Guidelines and Development Standards.</p>	<p>Consistent. The Project would be designed to be consistent with the Broadway Design Guide.</p>
<p>6. Building Scale and Massing</p>	
<p>Guideline 6: Building massing of new buildings should complement the existing urban form and the prevailing height of existing buildings while considering light, shadows, views, etc.</p>	<p>Consistent. Massing for the Project would include the building envelope developed to the sidewalk (at both street-facing elevations) through the 10th floor with an 11th floor terrace/amenity deck demarcating a setback of 14'- 6" that would continue to the roof offering a somewhat tri-partite composition typically found in classical mid-rise and skyscraper construction.</p>
<p>Standard 6a: To ensure the continuity of the scale and massing of the historic Broadway Corridor, new buildings or building additions should maintain a minimum height of the streetwall of 100 feet and a maximum height of 150 height at the front and side property lines. The street wall is largely defined by individual building massing.</p>	<p>Consistent. The Project will maintain the minimum height of the streetwall of 100 feet and maximum of 150 feet along Broadway and 4th Street. The tower element (setback from the podium) would begin on Floor 12.</p>
<p>Standard 6b: Buildings (or building additions) shall be built to the front property line above the ground floor and up to a minimum of 100 feet but no more than 150 feet above the sidewalk grade.</p>	<p>Consistent. The building will be built to the front property line above the ground floor and up to a minimum of 100 feet, but no more than 150 feet above the sidewalk on Broadway. The tower element (setback from the podium) would begin on Floor 12.</p>
<p>Standard 6c: South of Fourth Street, the portion of building above 150 feet (as permitted by tower standards) shall be setback a minimum of 30 feet from Broadway and any perpendicular street.</p>	<p>Consistent. The portion of the building above 150 feet will be setback a minimum of 30 feet from Broadway (44 feet) and 4th Street (47 feet)</p>
<p>Standard 6d: When constructing a tower, the portion of the building above 150 feet shall include a lot coverage of no less than 30-percent and not more than 40-percent of lot coverage which can include the minimum 30-foot setback when a 30-foot setback is required.</p>	<p>Consistent. The building portion above 150 feet will include a lot coverage between 30 and 40 percent. The tower element has a floor area of 13,117.80 square feet and a lot area of 37,529 square feet. Thus a percentage of 35 percent.</p>
<p>Standard 6e: All buildings shall incorporate pedestrian scale detailing at the ground floor.</p>	<p>Consistent. The Project will include pedestrian-scale details along the frontage for the retail, including windows and entrances.</p>

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<p>Standard 6f: New construction shall take into consideration the design features of prominent buildings, including the fenestration pattern and storefront openings common to the adjacent historic structures.</p>	<p>Consistent. The Project will consider the adjacent and nearby buildings (such as the Judson Building and Serra Building) for their design features such as fenestration. The podium levels of the building will be roughly even with the adjacent Judson Building. The Project building first floor (retail) will be a taller level than upper floors, similar to the Judson.</p>
<p>7. Building Articulation</p>	
<p>Guideline 7: Heighten visual interest and enhance pedestrian orientation by incorporating variation in the facades of buildings. These elements and variations may include: architectural features; changes in building materials, texture and color; generously sized, transparent display windows; arcades, canopies and awnings; cornices, and other details such as transom windows and over doors. New developments should be governed by a formal architectural concept, like the existing historic structures, that exhibits variation in the basic principles of visual order to clarify buildings' uses and differentiate ground floor uses.</p>	<p>Consistent. Exterior materials and finishes, as well as fenestration choices help to articulate the proposed design at the 4th Street and Broadway elevations, and would further reinforce the classical division of the building relative to the surrounding historic district. The ground floor retail would feature larger storefront windows, awnings, typical and frosted glass, black window mullions and transom panels, with white ice colored terra cotta walls and a horizontally aligned level of white metal spandrel panels reminiscent of belt coursing.</p> <p>Floors 2-10 would feature horizontally aligned windows, bisque colored terra cotta walls at floors two through nine, with the 10th floor articulated by white ice terra cotta walls and a terra cotta cornice pale in color which would establish a strong horizontal division where the building steps back, resulting in an overall scale and building height comparable to adjacent and nearby historic-era buildings. Floors 11-33 would feature vertically and horizontally aligned windows and balconies with typical glass at windows, grey glass at transoms, and frosted glass at balconies; a mix of white and black window mullions, and white ice colored cementitious panels at exterior walls. Floor 34 (the penthouse) would feature an additional setback from the established wall plane and a change in fenestration dimensions to include full-height (18') window walls in a darker glass with additional white ice colored cementitious panels at exterior walls capped by a flat roof with corbelled and bracketed terra cotta cornice in a similar pale color.</p>

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Standard 7a: Ground floors of buildings shall have a different architectural treatment than the upper floors and feature high quality materials that add scale, texture and variety at the pedestrian level.	Consistent. The ground floor will contain a different architectural treatment than the upper floors (podium and tower), including high quality materials that add scale, texture and variety.
Standard 7b: In order to respect existing historic features, the cornice or roof line of adjacent historic structures should be reflected with a demarcation on new adjacent structures.	Consistent. The building will respect the adjacent historic structure (The Judson Building) with a demarcation.
Standard 7c: Large unbroken surfaces shall be avoided through the use of individual storefronts, recessed storefront bays; and large, transparent display windows. Large storefronts should be divided by structural bays to maintain the highly articulated building form found on the corridor, characterized by narrow storefronts and other details. These details present a steady rhythm along the edge of the building at a comfortable human scale and create an inviting pedestrian environment.	Consistent. The Project will include retail storefronts with large transparent windows.
Standard 7d: Wall openings, such as storefront windows and doors, shall comprise at least 70-percent of the ground floor façade fronting a public street. Use non-reflective glass that allows a minimum of 90-percent light transmission on all street-fronting facades, especially in conjunction with retail uses. Dark tinted, reflective, or opaque glazing is prohibited for any required wall opening along street-facing, ground floor facades.	Consistent. The wall openings for windows and doors will be at least 70 percent of the façade. The glass will be non-reflective and not dark tinted, reflective, or opaque.
Standard 7e: Commercial ground-floor frontage should be distinguishable from the upper floor façades and should provide a strong building base. The ground floor commercial portion of development should relate to the scale, form and proportion of the rest of the building. Ground floor uses should be distinguished from the upper façade with inviting and transparent storefronts and sensitively scaled proportions. Commercial uses should have greater window-to-wall ratios than the upper stories of a building.	Consistent. The ground floor will be distinguishable from the upper floors through a higher ceiling height and other architectural details. The ground floor retail would be inviting and transparent, with multiple glass windows and entrances.
Standard 7f: When buildings occupy more than 150 feet of street frontage along any single street, their horizontal massing should be reduced by using articulation to create the appearance of multiple structures as stated in Guideline 6.	Consistent. The Project frontage on Broadway would be more than 150 feet. The horizontal massing will be reduced through building articulation to break up a large streetwall.
8. Entry Treatments	
Guideline 8: Each building should have a prominent main building entrance that allows pedestrians access to a main lobby from Broadway and any perpendicular side street to an active pedestrian environment.	Consistent. The proposed design includes a pedestrian / resident entrance at the ground floor Broadway elevation and an auto entrance / exit at the 4 th Street elevation adjacent to the existing alley. The lobby entrance is situated between two major retail spaces with a large window adjacent to

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	the entrance.
Standard 8a: A primary pedestrian entrance should be provided from the public street for all buildings.	Consistent. The Project's primary entrance will be on Broadway, oriented toward the street.
Standard 8b: Maintain the primary building entrance for all buildings along the public street so that they remain unlocked and unobstructed during normal business hours.	Consistent. The Project's primary entrance will be on Broadway, oriented toward the street.
Standard 8c: Highlight building main entrances with canopies or awnings, lighting, color, planters or other distinguishing architectural treatments around the doorway.	Consistent. The entrance will contain a slight building cut inwards to indicate the prominent entrance.
Standard 8d: Locate new service areas and loading docks on secondary facades whenever feasible.	Consistent. The service/trash areas would be accessed on Frank Court alley.
9. Storefronts	
Guideline 9: Encourage window-shopping and an active pedestrian environment by providing a significant level of storefront transparency at the ground floor on building facades along public streets. Storefronts should allow maximum visibility from sidewalk areas into the interior of all commercial uses. Storefront entrances should be designed so that they are a predominant architectural feature on the building façade and create an inviting entrance.	Consistent. The proposed ground floor elevations along Broadway and 4 th Street are almost entirely window walls or retail openings. An active pedestrian environment would be established at the building.
Standard 9a: Storefront entrances should be enhanced through architectural treatments around the doorway, individual awnings or placement of appropriate signage above the entryway.	Consistent. The ground-floor retail entrances will contain architectural treatments around the doorway and appropriate signage.
Standard 9b: Wall openings such as windows and doors should occupy at least 70-percent the ground floor façade fronting a public street.	Consistent. Wall openings such as windows and doors will occupy at least 70 percent of the ground floor façade.
Standard 9c: Use non-reflective glass that allows a minimum of 90-percent light transmission on all street-fronting facades.	Consistent. All street-fronting glass will be non-reflective and allow a minimum of 90-percent light transmission
Standard 9d: The bottom of storefront windows should be a minimum of 18-inches and a maximum of 24-inches from the sidewalk grade to accommodate a traditional bulkhead.	Consistent. The retail windows will be minimum of 18-inches and a maximum of 24-inches from the sidewalk grade.
Standard 9e: Recess new storefront windows at least 3 inches from the front plane of the building.	Consistent. The retail windows will be recessed at least 3 inches.
Standard 9f: Individual storefronts should not be used for storage or left empty without window displays. However, window displays shall not cover or block views into the building interior.	Consistent. The retail spaces will not be used for storage or left empty without a window display.
Standard 9g: Any railings shall be transparent and shall be subject to review.	Consistent. Any Project railings will be transparent.
Standard 9h: Locate interior mechanical equipment away from the storefront glazing.	Consistent. The interior mechanical equipment will be kept away from the storefront windows.
Standard 9i: Merchandise displayed out-of-doors should be neatly exhibited within cases	Consistent. The retail merchandise displayed will be neatly exhibited in

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constructed to fit within storefront recesses and within the interior of the property line. In limited instances, displays may encroach not more than three feet into the property line, with appropriate approvals from the Bureau of Engineering.	cased and within the encroachment limits approved by the Bureau of Engineering.
10. Windows	
Guideline 10: All structures should have as many windows as possible on the ground floor when facing a street or pedestrian walkway. There should be little or no blank wall area, except to separate buildings or retail/office spaces. This increases safety by allowing businesses to have ‘eyes on the street’ and passersby to see interior building activities. Windows should incorporate passive solar and other green building standards to the extent feasible to reduce energy consumption.	Consistent. The proposed ground floor elevations along Broadway and 4 th Street are almost entirely window walls or retail openings. The proposed design would not appear to discourage a pedestrian presence nor would it appear to create an unsafe environment.
Standard 10a: Use clear and non-reflective glass allowing a minimum of 90-percent light transmission on the ground floor.	Consistent. The Project will use clear and non-reflective glass allowing a minimum of 90-percent light transmission on the ground floor.
Standard 10b: Windows should be recessed (set back) from the exterior building wall, except where inappropriate to the building’s architectural style. The required recess may not be accomplished by the use of plant-ons around the window.	Consistent. The windows will be recessed from the exterior wall.
Standard 10c: Windows on levels above the ground floor should be evenly and regularly spaced to create a discernible rhythm.	Consistent. The windows in the levels above the ground floor (podium and tower) will be evenly and regularly spaced to create a rhythm.
Standard 10d: To minimize heat gain, projects should employ high-performance glazing (i.e., dual paned window), coupled with awnings or exterior window shelves - particularly along the southeast, south, and southwest building faces.	Consistent. The Project would include glazing (dual-pane) windows and will explore the feasibility of awnings and exterior window shelves.
Standard 10e: The placement of windows should balance light considerations with the need to provide adequate ventilation and allow for cross-ventilation. If single-sided ventilation is necessary, consider horizontal pivot windows, which offer the highest ventilation capacity.	Consistent. The windows will be placed to balance light considerations with adequate ventilation.
11. Façades, Exterior Surface Materials & Color	
Guideline 11: The texture of building facades should be complementary to other buildings in the surrounding area. Large expanses of the same building material detract from the building’s aesthetics. The use of varied and complementary building materials reduces the mass of a building and creates visual interest.	Consistent. The proposed design includes a building base that maintains continuity of sidewalk development patterns and street wall scale. Exterior walls are intended for cover with a terra cotta finish that changes from white ice colored at the ground floor retail, to bisque colored at floors two through nine, and pale grey at the 10th floor before the building is setback by almost 15’. Glazed terra cotta is one of three materials identified in the National Register nomination as being common

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	to the historic district. The proposed design offers a sufficient degree of variety in fenestration and fenestration materials (window glass and metal panels) such that some visual interest is created.
Standard 11a: The exterior facade of buildings shall consist of complementary building materials, including but not limited to masonry, brick or stone, consistent with the surrounding architectural character and styles. Textured stucco is prohibited.	Consistent. The building materials will consist of masonry, brick or stone, There would be not textured stucco.
Standard 11b: Buildings should not have monotonous exteriors, and should employ building materials that reduce massiveness and minimize glare impacts on surrounding uses.	Consistent. The building materials will be chosen to reduce the perception of mass and to minimize glare.
Standard 11c Projects should incorporate tile, terrazzo or other paving materials in building entryways and lobbies and allow the paving to spill out onto the sidewalk, when otherwise compatible with the architectural style of the proposed project.	Consistent. The Project could incorporate tile, terrazzo or other paving materials in building entryways and lobbies.
12. Lighting	
Guideline 12: Lighting should be incorporated into the design not only to accentuate architectural features, but also to provide a safe environment for pedestrian activity. All open areas, including parking lots, walkways, and trash areas, should have security lighting for safety.	Consistent. The building lighting will be designed, placed and directed to accentuate architectural features and provide safety and security. All open areas will have security lighting.
Standard 12a: New lighting fixtures should be compatible with the architectural design of the building.	Consistent. The building lighting will be compatible with the architectural design of the building.
Standard 12b: Storefront illumination from within is encouraged both during and after business hours to the extent possible.	Consistent. The retail spaces will be illuminated from within during operating hours, and after business to the extent possible.
Standard 12c: Provide lighting along all vehicular access ways and pedestrian walkways. Recessed lighting on the ground along vehicular access ways and pedestrian walkways is highly encouraged.	Consistent. There will be lighting along the vehicle driveways and pedestrian walkways.
Standard 12d: All exterior lighting should be directed onto the lot, and all flood lighting should be designed or shielded to eliminate glare to adjoining properties.	Consistent. The exterior lighting will be directed onto the Site and building, and shielding to eliminate glare to adjoining properties.
Standard 12e: Down lighting that illuminates the storefronts and sidewalks for pedestrians is encouraged.	Consistent. The Project will explore the feasibility of down lighting to illuminate the retail spaces and the sidewalk.
Standard 12f: Buildings should be highlighted through uplighting or accent lights placed on the façade where appropriate.	Consistent. The Project will include uplighting or accent lighting to highlight the façade.
Standard 12g: Lighting architectural details with washlights or other appropriate lighting fixtures is encouraged.	Consistent. The Project will light architectural details with washlights.

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Standard 12h: Intense lighting which is used solely for advertising purposes is strongly discouraged.	Consistent. The Project will not include intense lighting for advertising.
Standard 12i: Lighting that uses flashing, strobe, motion or multi-color elements is strongly discouraged. Lighting that promotes District identity is encouraged; lighting should offer a unique and visually stimulating experience, accentuate the surrounding architecture, and highlight special uses and activities.	Consistent. The Project will not include flashing, strobe, motion, or multi-color elements in the lighting.
Standard 12j: Relighting of basements and illumination and/or rehabilitation of glass block in sidewalks is encouraged.	Not Applicable. The Project Site does not have visible basements or glass block sidewalk illumination.
Standard 12k: Awnings may not be backlit.	Consistent. The Project will not backlight any awnings.
13. Awnings and Canopies	
Guideline 13: Where appropriate, use awnings or canopies to define the public realm of the sidewalk, provide shelter and shade, and enhance the building façade by adding variation, color, and horizontal rhythm. Awnings and canopies reinforce a pedestrian scale and add a comfortable sense of enclosure to outdoor seating and other active public uses.	Consistent. The proposed design maintains continuity with the historic materials and rhythm of the surrounding district by incorporating terra cotta wall finishes, a setback in the wall plane to maintain compatible views of the building base relative to the surrounding historic buildings, and use of colored metal (white and black) to create an impression of belt coursing and horizontal division.
Standard 13a: Size and placement of awnings and canopies should enhance the building’s overall frame, detailing, and rhythm. Placement should correspond to the location of a storefront or entrance.	Consistent. Awnings and canopies will enhance the buildings architectural details, rhythm, color, and texture and would be placed along the retail storefronts and entrances.
Standard 13b: For awnings located above windows, awning shapes shall be consistent with window frames.	Consistent. Awnings above windows will be shaped consistent with the window frames.
Standard 13c: Awnings and canopies shall be constructed of high quality, durable, fade-resistant, and fire-retardant materials. There are several types of awnings and canopies ranging from canvas to structural space frames.	Consistent. Awnings and canopies will be high quality, durable, fade-resistant, and fire-retardant.
Standard 13d: Plastic, vinyl and other similar materials should be not be used on storefront awnings. Shiny, high-gloss materials are not permitted.	Consistent. Awnings will not be made of plastic, vinyl and other similar materials, and would not be shiny or high-gloss.
Standard 13e: Avoid single awnings or canopies for buildings. Storefronts should provide one awning or canopy for each structural bay if such bays exist.	Consistent. There would not be only a single awning or canopy. Awnings would be provided along the retail storefronts and entrances.
Standard 13f: Awnings or canopies should not conceal architectural features and should be designed so as to be architecturally compatible with the structure on which they are to be attached.	Consistent. Awnings or canopies would not conceal architectural features and would be designed to be compatible with the building’s architecture and design aesthetic.

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Standard 13g: No items are permitted to hang from the awning.	Consistent. No item will hang from the awning.
Standard 13h: The valance on an awning may not be more than 16 inches tall.	Consistent. The valance on an awning will not be more than 16 inches tall.
Standard 13i: Standard awnings at street level may project up to 7 feet from the property line. At no point shall the underside of the awning structure be less than 8 feet from the ground.	Consistent. Awnings would project up to 7 feet from the property line and would be no less than 8 feet above the ground.
Standard 13j: Awnings above street level may project up to 3 feet beyond the property line.	Consistent. Awnings would project up to 3 feet beyond the property line.
Standard 13k: Awnings may not be backlit.	Consistent. The Project will not backlight any awnings.
Standard 13l: No trellis structures are permitted to be affixed above entryways and storefronts. Note: Projections into the public right-of-way, extending beyond private property, must obtain proper approval from the Department of Public Works Bureau of Engineering. A Revocable Permit may be necessary.	Consistent. There would be no trellis structures above entryways or storefronts.
14. Security Grilles	
Guideline 14: Buildings should be designed with security features that effectively deter criminal activity while maintaining a positive image about the community. When used, security grilles should be screened from view during business hours and should be integrated into the design of the building.	<p>Consistent. The building will be designed with security features according to the LAPD "Design Out Crime Guidelines: Crime Prevention Through Environmental Design".</p> <p>All proposed retail spaces are accessible from Broadway and 4th Street. The retail spaces do not provide public access to the interior of the new building, which would help to respond to security concerns for building residents. It is assumed that the pedestrian entrance on Broadway and the parking entrance on 4th Street would be secure and require a key or electronic code, etc. to gain access. No security grilles, including roll-down gates, have been reviewed as part of the Project design.</p>
Standard 14a: Permanently affixed exterior security grilles or bars are prohibited.	Consistent. There would be no permanent exterior security grills or bars.
Standard 14b: Security grilles should be retractable and should recess completely into pockets that completely conceal the grill when it is retracted. Such pockets should be integrated into the design of the building.	Consistent. If security grilles are used, they will be retractable and recessed and concealed completely into the building.
Standard 14c: Exterior accordion-style or roll-down security grilles that conceal storefront windows are prohibited.	Consistent. There would be no exterior accordion-style or roll-down security grilles.
15. Utilities, Mechanical Equipment, Trash Containers & Loading	

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Guideline 15: Utilities, storage areas, loading docks, mechanical equipment and other service areas should be screened from the adjacent public right-of-way. Equipment can be screened from public view through the use of building parapets, landscaping walls and other similar architectural treatments. Plywood and wood lattice screens should be avoided.	Consistent. All utilities, mechanical equipment, containers, and associated locations are sited away from public view or public use areas in the building. Retail and residential trash rooms and residential service and loading spaces are situated at the ground floor in the center of the building. These spaces are not publicly accessible.
Standard 15a: Locate all service areas and loading docks at the rear of structures or at the location that is most out of view to the general public.	Consistent. Service areas and trash would be located at the rear of the building, accessed from Frank Court alley.
Standard 15b: Screen all exterior rooftop and ground level mechanical equipment, including HVAC equipment, exhaust fans and satellite dishes from public view.	Consistent. The rooftop mechanical equipment will be screened from view. Any ground level mechanical equipment will also be screened.
Standard 15c: No mechanical equipment shall be permitted in window or door openings facing public streets.	Consistent. No mechanical equipment will be allowed in windows or door openings facing 4 th Street or Broadway.
Standard 15d: Service areas, such as those used for storage or automobile repair facilities, should be enclosed within a building.	Consistent. Any service area (trash or storage) will be enclosed within the building. There would not be an auto repair facility.
Standard 15e: Screen or locate solar panels away from the public right-of-way to the extent possible.	Not Applicable. The Project is not including solar panels.
Standard 15f: Locate enclosed trash containers at the rear of the building where they are not visible to the public.	Consistent. The trash rooms would be located to the rear of the building accessed via Frank Court alley.
Standard 15g: Trash storage bins should be located within a gated, covered enclosure constructed of materials identical to the exterior wall of the building so as not to be viewed from the public right-of-way. Landscaping may be used to screen such enclosures.	Consistent. The trash storage will be located in a secure space and not visible from the public right-of-way.
Standard 15h: Enclose all trash collection areas with a minimum six-foot high decorative wall or fence.	Consistent. The trash collection areas would be enclosed within the building on the ground floor.
Standard 15i: Provide a separate enclosure for trash and recyclable materials.	Consistent. The Project will provide a separate space for trash and recyclable materials, consistent with Mitigation Measure 17-12.
16. Sidewalk Dining Enclosures	
Guideline 16: Support an open and safe physical environment by designing enclosures for outdoor eating areas that do not detract from the quality of the pedestrian experience along the sidewalk.	Not Applicable. No sidewalk dining is proposed as part of the Project at this time.
Standard 16a: Enclosures should consist of elements that have an open or transparent framework or lattice design. The materials and design should be decorative and coordinate with structures on the site.	Not Applicable. The Project does not include sidewalk dining or restaurants.

Guidelines and Standards	Discussion
Standard 16b: No enclosures abutting a public street shall be taller than 42 inches.	Not Applicable. The Project does not include sidewalk dining or restaurants.
Standard 16c: Swinging gates, cantilevered objects or any other obstructions that create an unsafe environment for the blind or physically disabled are prohibited, unless deemed safe by the Bureau of Engineering.	Not Applicable. The Project does not include sidewalk dining or restaurants.
Standard 16d: Furnishings are limited to moveable chairs, tables, umbrellas, heaters and tarps. Plant material may be placed in moveable planting boxes.	Not Applicable. The Project does not include sidewalk dining or restaurants.
Standard 16e: Moderately sized lighting fixtures may be permanently affixed to the front of the main building to light outdoor sidewalk dining areas.	Not Applicable. The Project does not include sidewalk dining or restaurants.
Standard 16f: When installing sidewalk dining enclosures, the pedestrian path of travel on the sidewalk shall not be less than 7 feet in width and shall not include any border hardware such as parking meters, street lights, signs, news racks, posts, or other obstructions.	Not Applicable. The Project does not include sidewalk dining or restaurants.
Standard 16h: Sidewalk dining facilities shall be free standing, unattached to the sidewalk and shall be removed from the sidewalk when the dining facility is not open for business. Note: Projections into the public right-of-way, extending beyond private property, must obtain proper approval from the Department of Public Works, Bureau of Engineering. A Revocable Permit may be necessary.	Not Applicable. The Project does not include sidewalk dining or restaurants.
17. Wireless Telecommunication Facilities	
Guideline 17: Wireless telecommunication facilities should be designed so as to appear compatible with or complementary to surrounding architecture and structures.	Not Applicable. No wireless telecom facilities are proposed as part of the Project at this time.
Standard 17a: Where possible, wireless telecommunication facilities should be incorporated into existing buildings and other structures and should appear unobtrusive.	Not Applicable. The Project does not include wireless telecommunication facilities.
Standard 17b: Roof-top wireless facilities should be located so as to be least disruptive to the primary visible façade of the building and should be screened by materials that are simple and do not compete with or attempt to replicate the architectural features of the existing building.	Not Applicable. The Project does not include wireless telecommunication facilities.
18. Parking and Parking Structure Design	
Guideline 1: Parking lots and structures should fit within the urban fabric; massing, scale and façade articulation should respond to the surroundings and provide a degree of three-dimensional interest. The overall design should promote pedestrian safety by minimizing conflict with vehicles. Parking should encourage a balance between a pedestrian-oriented Broadway and necessary car storage. Protect nearby residents from potential adverse impacts — noise, visual, or otherwise — of parking	Consistent. Residential parking is proposed within the new building, with two levels of subterranean parking and five additional levels above the ground floor retail. The parking levels have been obscured from view within the building, and the exterior wall sections at the parking floors have been designed to feature windows with continued horizontal and

Guidelines and Standards	Discussion
and parking structures.	vertical alignment consistent with larger fenestration patterns at the building.
Standard 1a: To the extent possible, parking for all new buildings should be located underground or to the rear of the lot.	Consistent. There will be two subterranean parking levels.
Standard 1b: Rehabilitation of existing buildings should not result in new surface parking areas. Existing parking for all buildings that is already located underground or to the rear should be retained.	Not Applicable. The Project is not a rehabilitation of an existing building.
Standard 1c: Existing surface parking lots abutting a property line fronting a public should be screened by a durable barrier, such as a solid wall, fence, or hedge or landscaping not to exceed 42 inches in height.	Not Applicable. The Project does not involve an existing surface parking lot.
Standard 1d: Locate parking away from the streetwall and minimize direct driveway access from Broadway to improve streetwall continuity and encourage a safe and inviting pedestrian environment. Side streets and alleys shall provide the primary point of vehicular access for service and parking facilities for retail, commercial and residential uses as determined by the Director of Planning, in consultation with LADOT.	Consistent. The Project would have no driveways on Broadway. The primary point of access will be on Frank Court alley.
Standard 1e: Surface parking lots shall not be located between the front property line and building(s) on the site but should be located to the rear of all structures.	Not Applicable. The Project is not a surface parking lot.
Standard 1f: Surface parking is generally discouraged. Any surface parking areas should include a dedicated pedestrian walkway that extends the length of the parking area and leads to the primary structure it serves or the nearest public sidewalk. Pedestrian walkways through surface parking lots should be accompanied by decorative landscaping.	Not Applicable. The Project is not a surface parking lot.
Standard 1g: When there is on-site parking and vehicular access cannot be taken from a side street or alleyway, one driveway shall be permitted per every 200 feet of building frontage. Not more than two driveways shall be permitted per building, and at least 50 feet in distance should span between them.	Consistent. The access will be provided on a side street (4 th Street) and Frank Court alley.
Standard 1h: Driveway widths should be as narrow as possible (12 feet for one-way driveways and 24 feet for two-way driveways). Driveways shall lead to underground parking or parking stalls located to the rear of the building. Variations will be permitted only if the Department of Transportation determines that no other alternative exists that is consistent with these standards.	Consistent. The driveways will be permitted to widths approved by LADOT.
Standard 1i: New freestanding parking structures on Broadway and any perpendicular streets shall	Not Applicable. The Project is not a free-standing parking structure.

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<p>be prohibited, unless designed with retail uses at the ground floor at a minimum depth of 25 feet. The exterior of parking structures shall consist of architectural cladding that provides proportion, rhythm and scale for the purpose of creating an architectural facade on all street-facing facades. Particular attention should be paid to fenestration.</p>	
<p>Standard 1j: Parking structures shall not overtly appear to be used for parking. Parking structures shall be designed with architectural detailing (see Standard 1i above). Above grade parking levels shall be visually integrated into the design of the building façade.</p>	<p>Consistent. The parking levels above ground will be visually integrated into the building façade.</p>
<p>Standard 1k: Automobiles on parking levels above the ground floor shall be screened from public view as seen from a public street or alley.</p>	<p>Consistent. The parking levels above ground will be screened from public view by the building façade.</p>
<p>Standard 1l: Parking structures should receive landscape treatment to eliminate unattractive views.</p>	<p>Consistent. The parking structure will be screened from public view by the building façade to eliminate unattractive views.</p>
<p>Standard 1m: Any fences, gates or doors securing any parking garage entry or driveway shall be consistent with the streetwall.</p>	<p>Consistent. The parking entries will be consistent with the building façade.</p>
<p>Standard 1n: Where parking is provided within or to the rear of the building, pedestrian access or an arcade shall be provided from the parking or the rear of the building to the building's front property. Pedestrian walkways should be separated from driveways and service access ways.</p>	<p>Consistent. Pedestrian access from the parking to the front of the building will be provided through a lobby with elevators.</p>
<p>Standard 1o: Parking structures that abut or are adjacent to any residential use shall:</p> <ul style="list-style-type: none"> i. Contain solid decorative walls and/or baffles to block light and deflect noise along those sides closest to residential use; ii. Contain solid spandrel panels at a minimum of 3 feet 6 inches in height, installed at the ramps of the structure, to minimize headlight glare; iii. Construct garage floors and ramps using textured surfaces to minimize tire squeal; and iv. Not contain exhaust vents along sides closest to residential uses. 	<p>Consistent. The parking structure would be adjacent to residential uses and would comply with the design measures to block light, deflect noise, minimize headlight glare, minimize tire squeal, and have exhaust vents away from residential uses.</p>
<p>Standard 1p: The portion of the ground floor in new development not used as habitable floor space should be designed to accommodate commercial and theater loading and staging (i.e. the ability to accommodate semi-trucks and the provision of electrical outlets and high-speed internet access).</p>	<p>Not Applicable. The Project does not include commercial and theater spaces that would require semi-trucks for loading and staging.</p>
<p>19. Vehicular Access</p>	
<p>Guideline 2: Minimize conflicts between pedestrians on the sidewalk and automotive traffic by providing vehicular access to parking areas along side streets or alleys wherever possible.</p>	<p>Consistent. To minimize conflicts between pedestrians, cyclists, and automobiles, the parking entrance and exit point has been sited at the secondary elevation along 4th Street adjacent to the existing alley.</p>

Guidelines and Standards	Discussion
Standard 2a: Locate curb cuts and driveways at alleys or side streets to the greatest extent possible.	Consistent. Curb cuts and driveways would be on a side street (4 th Street) and Frank Court alley.
Standard 2b: Limit curb cuts to one per 200 feet of street frontage to the greatest extent possible.	Consistent. There would be one curb cut on 4 th Street for the driveway.
Standard 2c: Commercial uses in mixed-use developments should orient access ways (entries, service and parking) to minimize impacts on residential uses.	Consistent. The ground floor retail uses would be oriented toward Broadway and 4 th Street, which already contain many retail uses.
Signs	
No signage is proposed at this time.	
Landscaping	
1. Site Landscaping	
Guideline 1: Landscape the areas surrounding a building including site entrances, walkways and parking lots with small trees, planter boxes and tubs of flowers.	Consistent. The building will be landscaped with small trees, planter boxes, and tubs of flowers around walkways and entrances.
Standard 1a: Landscaping should not obstruct the pedestrian right-of-way or create inappropriate visual or physical barriers for vehicles and pedestrians.	Consistent. Landscaping will not obstruct the pedestrian right-of-way or create visual and physical barriers for pedestrian and vehicles
Standard 1b: Landscape plans should include a maintenance plan and be designed by a certified landscape architect.	Consistent. The landscape plans will include a maintenance plan by a certified landscape architect.
Standard 1c: Blank walls or other unattractive areas of a site or building shall be screened with landscaping.	Consistent. Any blank walls or unattractive areas will be screened with landscaping.
Standard 1d: Landscaping should be designed in such a way that is sensitive to, and does not obscure or detract from, the character defining features of the building.	Consistent. The landscaping will be designed to complement the features of the building.
Standard 1e: When appropriate, drought-tolerant, California native plants are encouraged. An automatic irrigation system should be installed within landscaped areas of more than 10 square feet. A drip irrigation system is recommended.	Consistent. The use of drought-tolerant, California native plants will be explored for feasibility. An automatic irrigation system would be installed in any landscaped area of more than 10 square feet.
Standard 1f: The use of less obtrusive landscaping and containers such as window boxes, hanging baskets, small urns, vessels or pots with plant material at entrances, as window and architectural accents, or to screen unattractive areas are encouraged. Plant materials shall be well maintained.	Consistent. The use of window boxes, baskets, urns, vessels, and pots at entrances such as windows and building accent, will be explored for feasibility. All plant materials will be well maintained.
2. Landscaping for Surface Parking Lots and Parking Structures	
Guideline 2: Buffer existing parking adjacent to a public right-of-way with a landscaped barrier.	Not Applicable. The Project would be removing an existing parking use contained in a 1-story retail building and constructing a parking structure within the façade of a podium and tower building. Thus, there is no need for a landscaped barrier.

Guidelines and Standards	Discussion
Standard 2a: Surface parking should be landscaped with one tree for every 5 parking spaces, with landscaping comprising not less than 7-percent of the total area of surface parking. Trees should provide a minimum canopy of 20 feet in diameter at maturity and be evenly dispersed throughout the lot.	Not Applicable. The Project does not include surface parking.
Standard 2b: Where parking structures are not wrapped with other uses (retail or residential), they shall be visually screened from frontage streets and adjoining uses by a landscape buffer around their perimeters, consisting of trees, planters and vegetation.	Not Applicable. The Project will be constructing a parking structure within the façade of a podium and tower building. Thus, it will be visually screened from the street by the building itself.
Standard 2c: A two-foot landscaped buffer shall be located between parking areas and the property line wherever a surface parking lot abuts the public right-of-way. The landscaped buffer area should be planted with low dense hedge or shrub not to exceed 42 inches.	Not Applicable. The Project does not include surface parking.
Standard 2d: The landscaping should provide a buffer between the parking and other uses, soften glare from vehicles, and filter noise.	Not Applicable. The Project does not include surface parking. The parking structure within the building will eliminate any glare and noise trespass onto any adjacent use.
Sustainability	
1. Sustainability Standards	
Guideline 1: Rehabilitation of existing structures as well as new building construction present opportunities to integrate sustainable design concepts that reduce resource consumption and encourage natural systems for cooling, lighting and shading. New construction projects are highly encouraged to meet the Leadership in Energy and Environmental Design (LEED) Green Building Rating System certification requirements and otherwise comply with the City's Green Building Ordinance, while rehabilitation projects are also encouraged to incorporate as many LEED building standards as possible into their design.	Consistent. The Project is a new building consistent with the CalGreen requirements of the California Building Code. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Standard 1a: Incorporation of the Leadership in Energy and Environmental Design (LEED) Green Building Rating System certification requirements in new construction is strongly encouraged; developments must comply with the City's Green Building Ordinance.	Consistent. The Project would be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint. The Project will explore the feasibility of other requirements from the LEED Building Rating System.
Standard 1b: Adaptive reuse of historic buildings is strongly encouraged as a means to achieve sustainability.	Not Applicable. The Project Site does not contain an historic building.

Guidelines and Standards	Discussion
<p>Standard 1c: Mixed use development in the transit-oriented Historic Core is strongly encouraged as means to achieve sustainability. Mixed use projects reduce automobile dependence by facilitating more walking trips to basic shopping and services.</p>	<p>Consistent. The Project is a mixed-use developed that would be transit-oriented and adjacent to mass transit in the Historic Core. It would include residential uses and bicycle parking to encourage walking and bike trips to shopping and services nearby.</p>
<p>Standard 1d: Restoration and rehabilitation of historic buildings is highly encouraged due to their site sensitivity, quality of construction, and use of passive heating and cooling-all of which promote energy efficiency. Incorporating sustainable principles during the rehabilitation and restoration of historic buildings, without compromising the building's historic character, is highly encouraged.</p>	<p>Not Applicable. The Project Site does not contain an historic building.</p>
<p>Standard 1e: The use of recycled and locally sourced materials is encouraged for restoration, rehabilitation, maintenance and new construction.</p>	<p>Consistent. The Project construction will use recycled and locally sourced materials, to the extent possible.</p>
<p>Standard 1f: Increased efficiency in construction methods, water, wastewater and storm water systems is encouraged. During restoration and rehabilitation, compatible building material alternatives are encouraged when possible-such as storm windows or double-paned windows-as a way to minimize noise and improve energy efficiency.</p>	<p>Consistent The Project would be a new construction that would be built to the latest efficient construction methods, and contains mitigation measures and code-required features that include water, wastewater, and storm water conservation.</p>
<p><i>Source: City of Los Angeles, Broadway Theater and Entertainment District Design Guide: http://cityplanning.lacity.org/complan/othrplan/pdf/broadway.pdf</i> <i>Source: Discussion of Guidelines 1-19 from pages 42-46 in Historical Resource Assessment Report, Revised April 2014. Included in the Appendices.</i> <i>Table: CAJA Environmental Services, April 2014.</i></p>	

Downtown Design Guide

The Downtown Design Guide (June 2009) established design standards for Downtown Los Angeles. The design principles for creating a liveable downtown are:

- District and Neighborhood Design
 - Employment Opportunities. Maintain and enhance the concentration of jobs, in both the public and private sectors, that provides the foundation of a sustainable Downtown.
 - Housing Choices. Provide a range of housing types and price levels that offer a full range of choices, including home ownership, and bring people of diverse ages, ethnicities, household sizes and incomes into daily interaction.
 - Transportation Choices. Enable people to move around easily on foot, by bicycle, transit, and auto. Accommodate cars but fewer than in the suburbs and allow people to live easily without one.
 - Shops and Services Within Walking Distance. Provide shops and services for everyday needs, including groceries, day care, cafes and restaurants, banks and drug stores, within an easy walk from home.
 - Safe, Shared Streets. Design streets not just for vehicles, but as usable outdoor space for walking, bicycling and visual enjoyment.
 - Gathering Places. Provide places for people to socialize, including parks, sidewalks, courtyards and plazas, that are combined with shops and services. Program places for events and gatherings.
 - Active Recreation Areas. Provide adequate public recreational open space, including joint use open space, within walking distance of residents.
 - A Rich Cultural Environment. Integrate public art and contribute to the civic and cultural life of the City.
- Building Design
 - Recognize individual projects are the “building blocks” of great streets and neighborhoods. This requires particular attention to the way the building meets the sidewalk, providing a transition to pedestrian scale and elements that activate the street.

- Respect historically significant districts and buildings, including massing and scale, and neighborhood context, while at the same time, encouraging innovative architectural design that expresses the identity of contemporary urban Los Angeles.
 - Accommodate vehicular access and parking in a way that respects pedestrians and public spaces and contributes to the quality of the neighborhood.
 - Express an underlying design philosophy (a “big idea”) that is articulated and supported by all aspects of building design and initially conveyed through design sketches, drawings and specifications.
- Sustainability is the overarching goal of the Design Guide and essential to the concept of a livable Downtown.⁹²

The Design Guide is intended to provide guidance for creating a livable Downtown. It includes both standards (requirements) and guidelines (suggestions). Standards typically use the word “shall”, an active verb (such as, “provide” or “install”), a clear directive (“are not permitted” or “are required”). Guidelines typically use the word “should” or “consider.” Projects must comply with standards and are strongly encouraged to comply with guidelines.

Table 4.10-6, Downtown Design Guide, lists the guidelines and standards from the Guide and the Project’s consistency with each applicable one. The Project would be consistent with the applicable and required standards. The Project will meet the guidelines to the extent feasible, and consistent with the Broadway Design Guide.

⁹² Downtown Design Guide: http://urbandesignla.com/downtown_guidelines.htm

**Table 4.10-6
Downtown Design Guide**

Guidelines and Standards	Discussion
Sustainable Design	
A. NEIGHBORHOOD DESIGN	
1. Support walkability through sensitive design of the site, building and streetscape.	Consistent. The Project would support walkability through its mix of uses, site design, and proximity to the Metro regional transit system.
2. Since all of Downtown is within walking distance of transit, design all projects as transit-oriented developments (TODs) that encourage residents, tenants and visitors to use transit.	Consistent. The Project would encourage residents and visitors to use transit because of its proximity to the Metro Rail Line Perishing Square Station
3. Orient projects to provide convenient access to the nearest transit options (Metro rail or bus, DASH) wherever possible.	Consistent. The Project would be oriented with entrances and lobby on Broadway, which has bus stops and within one block of the Metro Rail Line Station on Hill Street
B. STREET AND ALLEY DESIGN	
1. Design sidewalks, including street trees, parkways, tree wells and paving, to collect stormwater runoff, thereby contributing to sustainable Green Streets and enhancing the value of the project.	Not Applicable. The Project is not designing any sidewalk. However, the Project would not conflict with the Broadway Streetscape Plan for street trees or ability to collect stormwater runoff.
2. Design alleys and paseos to collect stormwater where feasible.	Not Applicable. The Project is not designing any alleys or paseos. Any alley upgrades or paving would be designed to collect stormwater, where feasible.
C. SITE AND LANDSCAPE DESIGN	
1. Incorporate on-site landscape elements that reduces energy use and enhance livability.	Consistent. The Project would include landscaping that is water sensitive and enhances the livability of the residential spaces.
2. Consider providing a green roof to reduce solar gain (which contributes to the urban heat island effect) and to reduce the quantity of water entering the storm drain system.	Neutral. The Project could consider a green roof, but it is not currently planned to include one.
D. BUILDING DESIGN	
1. All projects are required to comply with the City's Green Building Ordinance. In addition, projects that have an Owner Participation Agreement with CRA/LA are required to achieve LEEDTM Silver certification.	Consistent. The Project would comply with the City's Green Building Ordinance. The Project is not having an OPA with the CRA/LA.
2. Projects that include a hotel should participate in the California Green Lodging Program.	Not Applicable. The Project does not include a hotel.
3. Wherever possible, existing structures should be re-used and integrated into new projects to retain the architectural fabric of Downtown.	Not Applicable. The Project would not be reusing an existing structure.

Guidelines and Standards	Discussion
4. Projects that preserve and rehabilitate historic structures must comply with the Secretary of the Interior's Standards for Rehabilitation.	Not Applicable. The Project Site does not contain an historic structure.
Sidewalks and Setbacks	
A. SIDEWALKS	
Design sidewalks that are walkable and accommodate a variety of uses.	Consistent. The Project streetscape would include a variety of retail uses.
1. A building may project over the required sidewalk easement above a height of 40' and below a depth of 5' to accommodate street trees. Projections, which are permitted in the public ROW by the Municipal Code, such as signs, canopies and awnings, are permitted over the required easement, subject to the same approvals.	Consistent. The Project would not project over its easement below a height of 40 feet. Any signs, canopies, awnings would comply with the LAMC and the Broadway Design Guide.
2. Provide a minimum 6' continuous path of travel.	Consistent. The Project would not conflict with this standard.
3. Provide an 18-24" wide access zone next to the curb, which includes the 6" curb and 12" wide granite or brick edge band adjacent to the back of curb.	Consistent. The Project would not conflict with this standard.
4. Outdoor dining may occur on any portion of the paved sidewalk provided a minimum 6' wide continuous path of travel is maintained.	Not Applicable. The Project does not include outdoor dining.
Design sidewalks to accommodate and support large street trees and to collect stormwater, providing continuous parkways where feasible.	Consistent. The Project would not conflict with this standard.
5. Provide continuous landscaped parkways, except in the Historic Downtown, adjacent to bus stops, and in other locations determined by staff to be inappropriate for parkways. The continuous landscaped parkways should be designed to collect and retain or treat runoff from, at a minimum, the sidewalk and, if approved by the Bureau of Engineering, adjacent on-site, ground level open space during a storm event producing 3/4 inch of rainfall in a 24-hour period.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
6. Where there is curbside parking, one walkway for every one or two parking spaces or other means of access shall be provided through the parkway to curbside parking.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
7. If a parkway is designed to collect stormwater from the sidewalk only, the parkway shall be directly behind the access zone and a minimum of 7' wide where the required sidewalk width is 15' or more; 6' wide where the required sidewalk width is more than 10' but less than 15'; and 4' wide where the required sidewalk width is 10'.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
8. The elevation of the parkways within 2' of the sidewalk pavement shall be within a few inches of the sidewalk elevation. The center 2' or 3' of the parkway should be depressed 3-4" to form a shallow swale to collect sidewalk stormwater or alternative means of storing runoff,	Not Applicable. The Project will comply with the Broadway Streetscape Plan.

Guidelines and Standards	Discussion
such as gravel sumps within the parkway, may be provided.	
9. The roots of trees planted in the parkway shall not be restricted by concrete curbs, root barriers or other means, so that roots may extend throughout the parkway and support a large, healthy tree canopy.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
10. If parkways are designed to collect stormwater from the street as well as from the sidewalk, they shall be designed according to the Bureau of Engineering Green Streets guidelines or standards. However, if trees are required to be planted in separate tree wells, rather than in the parkways, as in the bottom right image, they shall be planted as described in the provisions for tree wells on the next page.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
Where it is not feasible to plant street trees in continuous landscaped parkways, provide large street wells with gap-graded soil beneath the sidewalk.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
11. If trees are not planted in continuous landscaped parkways with the opportunity for unrestricted root growth, they shall be planted in large trees wells that are at least 10' long and a minimum of 7' wide where the required sidewalk width is 15' or more; 6' wide where the required side walk width is more than 10' but less than 15'; and 4' wide where the required sidewalk width is 10'.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
12. If tree wells have less than 100 square feet of surface area, gap-graded soil shall be provided under the entire sidewalk as specified in Section 9 and Appendix B.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
13. Where average 24' wide sidewalks are required by the Downtown Street Standards (through a combination of dedication and easement), at least 50% of a project's frontage shall have sidewalks at least 22' wide and a second row of street trees aligned with those in the parkway zone shall be provided. The interior row of trees should generally be in large tree wells.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.
14. Where tree wells and parkways would conflict with existing basements, underground vaults, historic paving materials, or other existing features that cannot be easily relocated, the tree well and parkway design shall be modified to eliminate such conflicts. Parking meters and signs are examples of existing features that can be easily relocated. Digital copies of maps showing existing basements in the public ROW are available from BOE, CRA or City Planning Urban Design Studio.	Not Applicable. The Project sidewalk does not contain historic paving or other features that cannot be easily relocated.
15. Where existing sidewalks are narrow, as on east-west streets in the Historic Downtown, the reviewing agency may determine that street trees not be provided.	Not Applicable. The Project will comply with the Broadway Streetscape Plan.

Guidelines and Standards	Discussion
Install and maintain streetscape improvements on all streets adjacent to a project.	
16. Install streetscape improvements as specified in Section 9.	Consistent. The Project will comply with any streetscape improvements along the right-of-way as specified in the Broadway Streetscape Plan.
17. All sidewalk improvements shall be installed and maintained by the adjacent property owners. For example, parkways and tree wells shall be planted, irrigated and maintained by the adjacent property owners as described in Section 9.	Consistent. The Project will maintain any sidewalk improvements.
B. SETBACKS	
Provide setbacks appropriate to the adjacent land use and district.	Consistent. The Project will include setbacks that comply with the Broadway Design Guide.
1. On Retail Streets, as defined in Figure 3-1, and adjacent to ground floor space designed for retail use in other locations, the building streetwall (as defined in Table 6-1) shall be located at or within a few feet of the back of the required average sidewalk width.	Consistent. Broadway is designated a retail street where at least 75 percent of a street frontage must be designed to accommodate retail use. The Project building streetwall would be built to the property line consistent with the Broadway Design Guide.
2. Adjacent to ground floor space designed for other uses, buildings shall be set back from the back of the required sidewalk to provide a buffer between the sidewalk and building as specified in Table 3-1.	Consistent. The Project will include a small inlet to the lobby entrance to create a prominent entryway.
3. Variations in the setback are encouraged to respond to building function and to create visual interest.	Consistent. The Project will include variations in setbacks (podium and tower) consistent with the Broadway Design Guide.
4. Treatment of the setback required in Table 3-1 will vary with the use for which the ground-floor is designed:	Consistent. The Project will have 0' setback from the sidewalk for retail, as it is in the Historic Downtown area on Table 3-1.
5. Adjacent to retail, the setback, if any, shall be primarily hardscape and may be used for outdoor dining and other commercial activities.	Consistent. Any setback will be landscaped.
6. Adjacent to live-work space, the average two-foot setback, shall include a little landscaping, which may be in pots or raised planters. <ul style="list-style-type: none"> • Adjacent to ground-floor residential units with individual entries on the street, the minimum average 5-foot or 6-foot setback shall be primarily landscaped and may include walkways, porches, raised planters, other solid walls up to 3 feet above sidewalk elevation, and transparent fences (e.g., wrought iron, tubular steel, glass) up to a height of 5 feet above sidewalk elevation. • If the Reviewing Agency determines that the active ground floor treatment required in Section 4 is not feasible, a minimum average 5-foot setback which is densely landscaped shall be 	Not Applicable. There would be no live-work space.

Guidelines and Standards	Discussion
provided.	
Ground Floor Treatment	
A. GROUND FLOOR TREATMENT ALONG RETAIL STREETS	
Design ground floor space on designated Retail Streets for retail or other active uses, orienting tenant spaces to the street and maximizing storefronts and entries along the sidewalks to sustain street level interest and promote pedestrian traffic.	Consistent. The Project ground floor retail will be oriented to Broadway and include transparent storefronts and windows to sustain street level interest and pedestrian activity.
1. All streets in the Historic Downtown are Retail Streets. Refer to the Historic Downtown Los Angeles Design Guidelines for guidance regarding ground floor treatment in the Historic Downtown.	Not Applicable. The Historic Downtown Los Angeles Design Guidelines (2002) were created by the Los Angeles Conservancy and are no longer applicable. The Conservancy and the City now refer to this Downtown Design Guide.
2. On Retail Streets, ground floor space with a linear frontage equal to at least 50% or 75% of street frontage, as specified in Figure 3-1, shall be designed to accommodate retail, professional office, and live-work uses.	Consistent. Broadway is designated a retail street where at least 75 percent of a street frontage must be designed to accommodate retail use. The Project would include retail use.
3. The ground floor space within 150' of an intersection shall be designed specifically for retail uses. Mid-block ground floor space may be designed for retail, professional office, and live-work uses.	Consistent. The ground floor space is within 150' of the Broadway/4 th Street intersection, and it would be designed for retail use.
4. Where Retail Streets intersect other streets, the ground floor retail space should wrap the corner onto the intersecting streets.	Consistent. The ground floor retail would wrap the corner of Broadway/4 th Street.
5. Ground floor retail space may be provided on streets that are not designated as Retail Streets in Figure 3-1. If it is, the ground floor retail space should comply with these standards and guidelines.	Consistent. Both Broadway and 4 th Street are designated as retail streets and would contain ground floor retail.
6. Required ground floor retail space may be located along the required street wall (see Section 6) or along a courtyard or plaza, provided the retail frontage is not more than 60 feet from the back of sidewalk and is visible from the sidewalk.	Consistent. The ground floor retail would be visible from the sidewalk.
7. Required ground floor retail space shall be provided to a depth of at least 25 feet from the front façade and shall include an average 14'-0" floor-to-ceiling height. Note that the ground floor retail space may be occupied by other uses initially, but will be available for retail uses in the future when there is demand for such uses.	Consistent. The ground floor retail would be at a depth of at least 25 feet and the ceiling height would be 20 feet, outside of the small section that the Project requests be permitted a lower floor to ceiling height.
8. The primary entrance to each street-level tenant space that has its frontage along a public street shall be provided from that street.	Consistent. The street-level retail would have entrances along Broadway and 4 th Street, depending on the location.

Guidelines and Standards	Discussion
9. The primary entrance to each street-level tenant that does not have its frontage along a public street shall be provided from a pedestrian paseo, courtyard or plaza, which is connected to the public street.	Not Applicable. All retail would have frontage on the public street.
10. Wall openings, such as storefront windows and doors, shall comprise at least 75% of a building's street level façade.	Consistent. Wall openings, like windows and doors, will comprise at least 75 percent of the ground floor façade.
11. Clear glass for wall openings, i.e., doors and windows, shall be used along all street-level façades for maximum transparency, especially in conjunction with retail uses. Dark tinted, reflective or opaque glazing is not permitted for any required wall opening along street level façades.	Consistent. The wall openings will use clear glass.
12. During hours of operation, open-wall storefronts are encouraged.	Consistent. During operation hours, there will be open-wall storefronts.
B. GROUND FLOOR TREATMENT ALONG OTHER STREETS	
Design ground floor space facing other streets to accommodate habitable space and to avoid blank walls and visible parking.	Consistent. The ground floor space will avoid blank walls, with windows, doors and architectural features. Parking would not be visible.
1. Along other streets, at least 75% of the ground floor street frontage shall be designed to accommodate the following uses: retail, cultural, professional office, live/work units, residential units with individual entries along the street, and/or other active space such as recreation rooms or common rooms.	Consistent. The ground floor street frontage will include at least 75 percent retail use.
2. The ground floor treatment of those uses, except residential units with individual entries, should be similar to that of retail space, except that wall openings shall comprise at least 50% of the street level façade.	Consistent. The Project will comply with this standard.
3. Residential units with individual entries should include windows on the ground floor that look out onto the street.	Not Applicable. The residential units would not include individual entries.
4. If a residential unit's individual entry along the street is the unit's primary entry, it must be accessible, that is, at the same elevation as the sidewalk.	Not Applicable. The residential units would not include individual entries.
5. If a residential unit's individual entry along the street is a secondary entry, the entry and any private outdoor space for the unit may be several (but not more than 4 or 5) steps above the sidewalk elevation. Private outdoor open space for the unit must be directly accessible from the unit, that is, at the same elevation.	Not Applicable. The residential units would not include individual entries.
C. GROUND FLOOR TREATMENT ALONG ALL STREETS	
Orient buildings to the street to promote the sidewalk activity.	Consistent. The building will be oriented toward Broadway.

Guidelines and Standards	Discussion
1. A building's primary entrance, defined as the entrance which provides the most direct access to a building's main lobby and is kept unlocked during business hours, shall be located on a public street or on a courtyard, plaza or paseo that is connected to and visible from a public street.	Consistent. The buildings primary entrance leading to the lobby will be accessible, prominent and visible along Broadway.
2. At least one building entrance, which provides access to a building's main lobby and which is kept unlocked during business hours, shall be located on a public street.	Consistent. The buildings primary entrance leading to the lobby will be accessible, prominent and visible along Broadway.
3. At least one building entrance, which may be either a building or tenant/ resident entrance, shall be provided along each street frontage.	Consistent. The buildings primary entrance leading to the lobby will be accessible, prominent and visible along Broadway. There will also be retail entrances along 4 th Street and Broadway.
4. More public entrances than the minimum specified, including building and/or tenant/resident entrances, are encouraged.	Consistent. There will be multiple retail entrances along 4 th Street and Broadway.
Incorporate a pedestrian-oriented scale at the street level.	
5. Street wall massing, articulation and detail, street level building entrances and storefront windows and doors, as well as the use of quality materials and decorative details, shall be used to promote pedestrian-scaled architecture along the street.	Consistent. The massing, articulation, windows, doors, materials, and decorative elements will be designed to a pedestrian-scale on the ground floor and comply with the Broadway Design Guide.
6. Architectural features that reinforce the retail character of the ground street wall and/or help define the pedestrian environment along the sidewalk, such as canopies, awnings, and overhangs, are encouraged and should be integral to the architecture of the building.	Consistent. The architectural features for the retail spaces will define the pedestrian environment and comply with the Broadway Design Guide.
7. Awnings and canopies shall be fabricated of woven fabric, glass, metal or other permanent material compatible with the building architecture. Internally illuminated, vinyl awnings are not permitted.	Consistent. Awning and canopies will comply with this standard for the materials and illumination, and comply with the Broadway Design Guide.
Don't waste valuable street frontage on "back of house" uses.	Consistent. There would be no mechanical or service features visible on Broadway or 4 th Street.
8. Electrical transformers, mechanical equipment and other equipment should not be located along the ground floor streetwall.	Consistent. There would be no mechanical or service features visible on Broadway or 4 th Street.
9. Electrical transformers, mechanical equipment, other equipment, enclosed stairs, storage spaces, blank walls, and other elements that are not pedestrian-oriented shall not be located within 100 feet of the corner on north-south streets and within 50 feet of the corner on east-west streets.	Consistent. There would be no mechanical or service features on Broadway or 4 th Street. There is a stair case on Broadway that would be more than 100 feet from the corner of Broadway/4 th Street.
Parking and Access	

Guidelines and Standards	Discussion
A. ALL PARKING AND ACCESS	
Locate parking, loading and vehicular circulation to minimize its visibility.	Consistent. Parking, loading, services (trash) would be accessed in the rear of the building on Frank Court alley. Parking circulation would be internal within the building and not visible to the street.
1. Parking required for a project shall be integrated into the project it serves. Public parking may be either a freestanding structure or integrated into a project, provided it is clearly signed as public parking.	Consistent. The parking would be integrated into the building.
2. Except for the minimum ground-level frontage required for access to parking and loading, no parking or loading shall be visible on the ground floor of any building façade that faces a street.	Consistent. There would be an access to the parking on 4 th Street. No parking or lading would be visible from 4 th Street or Broadway.
3. Parking, loading or circulation located above the ground floor shall be 1) lined by habitable floor area along all street frontages or, 2) if the project sponsor demonstrates that it is not feasible to line the parking with habitable space above the ground floor, integrated into the design of the building façade.	Consistent. Parking and circulation above the ground level would be lined with habitable space (residential on floors 5 and 6). Parking on levels 2, 3, and 4 would be integrated into the design of the building façade.
4. Where parking above the ground floor that is not lined with habitable space is permitted, a maximum of three parking levels fronting on a public street shall be allowed above the ground floor, provided they are integrated into the design of the building façade and at least one habitable floor is provided directly above the visible parking levels.	Consistent. There would be three parking levels above the ground floor that is not lined with habitable space. The levels would be integrated into the building façade. There would be habitable floors above the parking levels.
5. Drive-through aisles for fast food or similar use are not permitted.	Not Applicable. There would be no drive through aisles.
Locate drop-off zones along the curb or within parking facilities to promote sidewalk/streetwall continuity and reduce conflicts with pedestrians.	Not Applicable. There would be no drop-off zones.
6. Drop-off, including residential, hotel and restaurant drop-off, shall be provided either 1) within the off-street parking facilities using the parking access or 2) along the required curb line where there is a full-time curbside parking lane, with no sidewalk narrowing. Exception: where there is no curbside parking lane and off-street drop-off is not feasible, a hotel may have a drop-off lane up to 80 feet long provided the required sidewalk width is maintained.	Not Applicable. There would be no drop-off zones on the street. Parking and access would be provided primarily on Frank Court alley.
Encourage the use of alternate modes of transportation by providing incentives for reduced automobile use.	Consistent. The Project would include bicycle parking and be located close to the regional transit system.
7. No more than the minimum required parking may be provided unless provided for adjacent buildings that lack adequate parking.	Consistent. The Project is utilizing is requesting relief from the condo parking requirements and is utilizing reductions to the code required parking for enterprise zones and bicycle parking.

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8. Parking shall be sold or rented separately from residential units and commercial spaces (“unbundled”) in perpetuity. Parking that is required for residential use but is unused and all commercial parking should be made available as public parking during daytime and evenings.	Consistent. The Project’s parking will comply with this standard.
9. Provide at least one secure bicycle parking space for every two residential units. Provide secure bicycle parking within 200 yards of a building entrance for at least 10% of commercial and institutional building occupants.	Consistent. The Project will include 572 bicycle spaces, which is 69 more than required.
Limit the number and width of curb cuts and vehicular entries to promote street wall continuity and reduce conflicts with pedestrians.	Consistent. The Project will remove the existing curb cut on Broadway and continue to existing curb cut on 4 th Street. Additional access would be provided on Frank Court alley.
10. Vehicular access shall be from an alley or mid-block on an east-west street where feasible.	Consistent. The access will be from Frank Court alley and 4 th Street
11. Curb cuts and parking/loading entries into buildings shall be limited to the minimum number required and the minimum width permitted.	Consistent. There will be one curb cut on 4 th Street, where there is an existing curb cut, at the minimum width permitted.
12. Parking and loading access shall be shared where feasible.	Consistent. The parking and loading access will be shared between the different uses, residential and retail.
13. Parking and loading access shall be located a minimum of 25 feet from a primary building entrance, pedestrian paseo, or public outdoor gathering area. This guideline shall not apply to a hotel porte cocheres.	Consistent. The parking will be at least 25 feet from the primary building entrance on Broadway.
14. Where a vehicular exit from a parking structure is located within 5 feet of the back of sidewalk, a visual/audible alarm shall be installed to warn pedestrians and cyclists of exiting vehicles.	Consistent. If the residential vehicle exit on 4 th Street is within 5 feet of the back of the sidewalk, then a visual/audible alarm will be installed.
B. STAND-ALONE PARKING STRUCTURES	
1. Parking structures shall have an external skin designed to improve the building’s appearance over the basic concrete structure of ramps, walls and columns. This can include heavy-gage metal screen, pre-cast concrete panels, laminated glass or photovoltaic panels.	Not Applicable. The Project does not include a stand-alone parking structure.
2. Parking structures should integrate sustainable design features such as photovoltaic panels (especially on the top parking deck), renewable materials with proven longevity, and stormwater treatment wherever possible.	Not Applicable. The Project does not include a stand-alone parking structure.
3. Vertical circulation cores (elevator and stairs) shall be located on the primary pedestrian corners and be highlighted architecturally so visitors can easily find and access these entry points.	Not Applicable. The Project does not include a stand-alone parking structure.

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4. Treat the ground floor along public streets as specified in Section 4: on Retail Streets provide active ground floor uses along the street frontage of the garage; on all other streets the ground floor treatment should provide a low screening element that blocks views of parked vehicle bumpers and headlights from pedestrians using the adjacent sidewalk.	Not Applicable. The Project does not include a stand-alone parking structure.
5. Signage and wayfinding should be integrated with the architecture of the parking structure.	Not Applicable. The Project does not include a stand-alone parking structure.
6. Integrate the design of public art and lighting with the architecture of the structure to reinforce its unique identity. This is especially important for public parking structures to aid in visitors finding them upon arrival and getting oriented to Downtown.	Not Applicable. The Project does not include a stand-alone parking structure.
7. Interior garage lighting should not produce glaring sources towards adjacent residential units while providing safe and adequate lighting levels per code.	Not Applicable. The Project does not include a stand-alone parking structure.
8. In most circumstances, streetscape and landscaping should complement the building design. If a parking structure is well-designed, it does not need to be screened by dense landscaping in an urban setting.	Not Applicable. The Project does not include a stand-alone parking structure.
9. However, where the Reviewing Agency determines that conformance with the architectural design standards and guidelines in 5.A. is not feasible, an unattractive parking structure may be screened with landscaping.	Not Applicable. The Project does not include a stand-alone parking structure.
10. A “green screen” that is coordinated with the building design may be provided, along with the required streetscape improvements.	Not Applicable. The Project does not include a stand-alone parking structure.
11. Alternatively, an additional row of evergreen columnar trees may be provided in a minimum 8-foot wide setback and staggered with the street trees. In combination, the setback and street trees should screen the parking structure from view.	Not Applicable. The Project does not include a stand-alone parking structure.
C. ALLEYS AND BUILDING WALLS FACING ALLEYS	
Maintain and enhance alleys.	
1. No existing alley shall be vacated unless 1) vehicular access to the project is provided only at the former intersection of the alley with the street; 2) vacating the alley will not result in the need for additional curb cuts for other parcels on the same block; and 3) an east-west pedestrian paseo at least 20 feet wide will be provided in the middle third of the block as part of the project.	Not Applicable. The Project would not vacate an alley.
2. As a general rule, Downtown alleys shall not be gated. Existing gates shall be removed where feasible.	Not Applicable. The Frank Court alley is not currently gated and would not be gated.

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Use alleys primarily for vehicular access, loading and service.	Consistent. Frank Court alley would be used primarily for access.
3. The primary purpose of most Downtown alleys is vehicular access and loading. The exceptions are “pedestrian-priority” alleys as designated as “pedestrian-priority” alleys by the Reviewing Agency. Pedestrian-priority alleys typically are located in the City Markets district.	Consistent. Frank Court alley would be used primarily for vehicle access to the parking structure and for access to trash areas. The alley would not be a pedestrian-priority alley.
4. Access to parking shall be from an alley where one exists or can be provided.	Consistent. Frank Court alley would be used primarily for access.
5. Where there is no alley and the project includes frontage on an east-west street, parking access shall be located mid-block on the east-west street.	Not Applicable. Frank Court alley would be used primarily for access.
Provide access to utilities and mechanical equipment from alleys.	Consistent. Frank Court alley would be used primarily for access.
6. Electrical transformers shall be located to be accessed from an alley where one exists or can be provided. If located adjacent to a sidewalk, they shall be screened and incorporated into the building to read as a storefront or office.	Consistent. The electrical room would located on the ground floor in the interior of the building, not at the streetfront. Transformers would be accessed from the alley or screened and incorporated into the building.
Design building walls that face alleys to be attractive those who see them.	Consistent. The wall that faces Frank Court will be attractively designed.
7. While they can be more simply designed than street-facing façades, building walls that face alleys nonetheless should be visually attractive.	Consistent. The wall that faces Frank Court will be attractively designed, consistent with design standards of the Broadway Design Guide.
8. Parking levels may be visible but should be designed to alleviate the horizontality and lack of articulation and to screen lighting from the public rights-of-way and surrounding residential units, as described in the prior discussion of free-standing parking structures.	Consistent. The parking levels would be incorporated into the building façade.
Ensure that residents are not adversely affected by the use of alleys for parking access, service and loading.	Consistent. Frank Court alley is an existing alley that will be used to access the Project.
9. Each home buyer and renter in the Downtown shall sign a statement acknowledging that: <ul style="list-style-type: none"> • Sound levels may be higher than in other locations due to traffic on streets and alleys, street activity, ground floor uses, vehicular loading, and trash collection; • There will be additional development all around them; • Alleys will be used as the primary access to all parking in the Downtown and for loading, utilities and trash collection. 	Consistent. The Project will comply with this requirement.
10. Residential units shall not be located on the ground floor adjacent to alleys in order to reduce light, glare, and noise concerns.	Consistent. There will be no residential units on the ground floor.
11. Residential units shall be designed to maintain interior sound levels, when windows are closed, at below 45 dB. Because the exterior sound level may exceed 60 dB, measures in addition to conventional construction are suggested to meet the interior standard, including:	Consistent. The Project will comply with this requirement during the design of the residential units.

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<ul style="list-style-type: none"> • Use of 1/4" laminated or double glazing in windows • Installation of rubberized asphalt in the alleys. 	
Incorporate green elements in alleys.	Not Applicable. The Project does not have jurisdiction over the alley.
12. Subject to approval by BOE, install permeable paving to infiltrate storm water and eliminate standing water.	Not Applicable. The Project does not have jurisdiction over the alley.
Massing and Street Wall	
A. MASSING	
Design building massing to reinforce the street wall with well-scaled elements or structures that are sensitive to the neighborhood context..	Consistent. The Project design and massing, scale and architectural elements would comply with the Broadway Design Guide .
1. Break large projects into a series of appropriately scaled buildings so that no building is more than 300 feet in length. Provide a passageway at least 20 feet wide between buildings.	Not Applicable. The Project does not have a frontage more than 300 feet in length.
2. Generally, buildings should maintain a consistent street wall along their street frontages. While variety in massing can occur through step-backs as a building ascends upward, it is not required.	Consistent. The Project design and massing, scale and architectural elements would comply with the Broadway Design Guide .
3. Monolithic slab-like structures that wall off views and overshadow the surrounding neighborhood are discouraged.	Consistent. The Project would not be a monolithic structure as it would include setbacks and articulation consistent with the Broadway Design Guide .
4. To assist staff in understanding the proposed massing of a project, all projects shall provide a 3-D digital model in Google Earth SketchUp format.	Consistent. The Project will comply with this standard.
B. STREET WALL	
On Retail Streets, design building walls along the sidewalk (Street Walls) to define the street and to provide a comfortable scale for pedestrians.	Consistent. The ground floor retail will be designed to provide a comfortable scale for pedestrians.
1. Street walls shall be located in relationship to the back of sidewalk as specified in Table 3-2.	Consistent. The Project would comply with this standard.
2. 90% of a building's street walls shall have the minimum number of stories specified Table 6-2. Walls above the ground floor that step back less than 15 feet from the ground floor street wall are considered to be part of the street wall.	Consistent. The Project's street wall height will be consistent with this standard of being at least 6 stories for the Historic Downtown district .
3. Buildings may, but are not required to, step back above the minimum height required along the street. Step backs should be judiciously applied to minimize disruption of the overall street wall.	Consistent. The Project stepbacks would be at the tower element above the podium consistent with the Broadway Design Guide .
4. Breaks in the street wall should be limited to those necessary to accommodate pedestrian pass-throughs, public plazas, entry forecourts, permitted vehicular access driveways, and hotel	Consistent. The streetwall would include breaks for retail entries and the entry to the lobby. There would be one driveway on 4 th Street near Frank

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drop-offs.	Court alley.
5. An identifiable break should be provided between a building's retail floors (ground level and, in some cases, second and third floors) and upper floors. This break may consist of a change in material, change in fenestration, or similar means.	Consistent. The Project would include a design change or material change to delineate a difference between the retail on the ground floor and the upper levels, consistent with the Broadway Design Guide.
C. SPACING	
Towers should be spaced to provide privacy, natural light and air, as well as to contribute to an attractive skyline.	Consistent. The tower would be designed to provide privacy, natural light and air and fit within the Downtown skyline.
1. Generally, the portion of a tower above 150 feet shall be spaced at least 80 feet from all existing or possible future towers, both on the same block and across the street, except where 1) the towers are offset (staggered), 2) the largest windows in primary rooms are not facing one another, or 3) the towers are curved or angled, as illustrated in Figure 6-2. Where there is an existing adjacent tower, the distance should be measured from the wall of the existing adjacent tower to the proposed tower. Where there is no existing adjacent tower, but one could be constructed in the future, the proposed tower must be 40 feet from an interior property line and 40 feet from the alley center line shared with the potential new tower as shown in Figure 6-2.	Consistent. The Project would not be adjacent to any existing tower greater than 150 feet. Any existing or future tower would be at least 80 feet from the Project.
Provide privacy and natural light and air for all residential units.	Consistent. The Project would provide privacy, natural light and air for all residential units.
2. The shortest horizontal distance between the specified window of one residential unit and the specified window or wall of another residential unit in the same project shall have, at a minimum, the "line-of-sight" distances from the middle of the windows specified in Table 6-2 below.	Consistent. The Project windows will comply with the line-of-sight distances between units consistent with the standard.
3. In dwelling units, operable windows shall be installed in all units to provide natural ventilation.	Consistent. The dwelling units will include operable windows for natural ventilation.
D. TOWERS	
Towers should have slender massing and sound proportions.	Consistent. The tower will be more slender mass than the podium base.
1. Towers should have their massing designed to reduce overall bulk and to appear slender.	Consistent. The tower will be more slender mass than the podium base.
2. Towers may extend directly up from the property line at the street and are not required to be setback.	Consistent. The tower will be setback from the podium base consistent with the requirements of the Broadway Design Guide.
3. Tower siting and massing should maintain key views to important natural and man-made features.	Consistent. The tower will not impede views along Broadway toward the theater district or Civic Center area, or along 4 th Street to Bunker Hill or the

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	Historic Core.
Tower forms should appear simple yet elegant, and add an endearing sculptural form to the skyline.	Consistent. The tower will be consistent with the requirements of the Broadway Design Guide.
4. Towers should be designed to achieve a simple faceted geometry (employing varied floor plans), and exhibit big, simple moves. They should not appear overwrought or to have over-manipulated elements.	Consistent. The tower will be consistent with the requirements of the Broadway Design Guide.
5. Towers that emulate a more streamline modern style (such as a Mies van der Rohe tower employing a single floor plan) should provide variety through subtle details in the curtain wall, and the articulation of a human scaled base at the street level.	Consistent. The tower will be consistent with the requirements of the Broadway Design Guide.
6. If a project has more than one tower, they should be complementary to each other and employ the same architectural design approach.	Not Applicable. The Project will not have more than one tower.
7. Generally, buildings over 150' tall (the historic datum for Downtown) should not be historicized. They are contemporary interventions in the skyline and should appear as such.	Consistent. The tower will be consistent with the requirements of the Broadway Design Guide, and will look modern and not historicized.
8. A tower's primary building entrances should be designed at a scale appropriate to the overall size and design of the tower and be clearly marked.	Consistent. The tower entrance will be prominent on Broadway.
9. A building's top should be delineated with a change of detail and meet the sky with a thinner form, or tapered overhang.	Consistent. The tower top will be delineated with a change of detail to hold the penthouse and rooftop mechanical equipment.
On-Site Open Space	
Provide publicly accessible open spaces at street level that provide pedestrian linkages throughout Downtown.	Not Applicable. The Project does not include publicly accessible open space. There would be private open space for the residents.
1. A 50% reduction in required open space will be granted if a project includes open space that is: <ul style="list-style-type: none"> • Located at the ground level; • Open to the public during daylight hours; • At least 5,000 square feet in size; • Lined with ground floor spaces designed for retail, especially restaurants that include outdoor dining, and/or cultural uses, along at least 20% of its frontage; • At least 40% landscaped, including usable lawn or lawn alternative; and includes at least one gathering place with fountain or other focal element. 	Not Applicable. The Project does not include publicly accessible open space. There would be private open space for the residents.
2. Where blocks are longer than 400 feet (the north-south dimension of most Downtown blocks	Not Applicable. The Project does not have more than 300 feet of frontage

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exceed 400 feet), one mid-block pedestrian pathway or paseo, which is open to the public, should be provided by a project that includes more than 300 feet of frontage or is located in the middle of the block.	and is not in the middle of the block.
<p>3. A paseo shall:</p> <ul style="list-style-type: none"> • Be at least 15' wide at a minimum and 20' wide average; • Have a clear line of sight to the back of the paseo, gathering place, or focal element; • Be at least 50% open to the sky or covered with a transparent material; • Be lined with ground floor spaces designed for retail, especially restaurants, and/or cultural uses along at least 50% of its frontage; and • Include at least one gathering place with a fountain or other focal element. Provide adequate open space to serve residents. 	Not Applicable. The Project does not include a paseo.
4. Site landscaping and residential open space shall be provided as required by Section 12.21.G. of the Zoning Code, except as follows:	Consistent. The Project's open space requirement and amount provided are shown in Table 2-5, Project Open Space. The Project would be deficient of the open space requirement by 2,088 square feet. The Project is seeking relief for reduction in required open space.
5. At least 50% of the required trees shall be canopy trees that shade open spaces, sidewalks and buildings.	Consistent. The street trees that shade the sidewalk will be consistent with this standard.
6. Variances from the required number of trees shall not be permitted; however, required trees may be planted off-site if the Reviewing Agency determines that they cannot be accommodated on-site. Off-site trees may be planted, in the following locations in order of preference: nearby streets, public parks and private projects	Consistent. If the required number of trees cannot be accommodated on site, the Project will provide the trees to be planted off-site according to the City's preference: nearby streets, public parks, and private projects.
Establish a clear hierarchy of common open spaces distinguished by design and function to create an connected pedestrian realm conducive to both active and passive uses.	Neutral. The Project has open space terraces for the residents. There would be no other hierarchy of open space (paseos, forecourts, plazas).
7. Locate on-site open space types in relation to the street and permit public access during normal business hours as follows:	Not Applicable. The Project does not include common open space for the public. There would be open space terraces for the residents.
Incorporate amenities that facilitate outdoor activities such as standing, sitting, strolling, conversing, window-shopping and dining, including seating for comfort and landscaping for	Consistent. The Project would facilitate window-shopping with retail spaces containing transparent windows, consistent with the Broadway Design Guide.

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shade and aesthetics.	
8. Provide landscaping and seating in each open space type as follows. Planters, planter boxes and similar planting containers may count toward this requirement.	Consistent. The landscaping and seating for the terraces will be provided at 25 percent landscaping and no specific minimum seating.
9. Plazas and courtyards are encouraged to incorporate amenities beyond the minimum required, including permanent and/or temporary seating, to facilitate their enjoyment and use. Seating should be placed with consideration to noontime sun and shade; deciduous trees should be planted as the most effective means of providing comfortable access to sun and shade.	Not Applicable. The Project does not include plazas and courtyards.
Use landscape elements to provide shade and other functional and aesthetic objectives.	Consistent. The Project will use landscaping to provide shade and aesthetics.
10. On roof terraces, incorporate trees and other plantings in permanent and temporary planters that will shade, reduce reflective glare, and add interest to the space. In addition, provide permanent and temporary seating that is placed with consideration to sun and shade, and other factors contributing to human comfort.	Consistent. The terraces will incorporate landscaping to provide shade, reduce glare, and add an interesting aesthetic to the space. Seating (permanent or temporary) will be provided
11. Landscape elements should support an easy transition between indoors and outdoors through such means as well-sited and comfortable steps, shading devices and/or planters that mark building entrances, etc.	Consistent. The landscaping will support the transition from indoors to outdoors.
12. Landscape elements should establish scale and reinforce continuity between indoors and outdoors space. Mature canopy trees shall be provided within open spaces, especially along streets and required setbacks.	Consistent. The landscaping will establish a scale and continuity between indoors to outdoors.
13. Landscape elements should provide scale, texture and color. A rich, coordinated palette of landscape elements that enhances the Development Site's identity is encouraged.	Consistent. The landscaping will provide texture and color.
14. Landscaping should be used to screen or break up the mass of blank walls. For example, trees and shrubs may be planted in front of a blank wall where there is room or vines may be trained on the wall where space is limited.	Consistent. If the building will have a blank wall, after complying with the Broadway Design Guide, then it can be covered with vines, or have trees, or shrubs planted in front.
Design open space areas so as to lend them the character of outdoor rooms contained by buildings.	Consistent. The residential open spaces will be designed as outdoor rooms.
15. Contain open space along a minimum percentage of its perimeter by building and/or architectural features as follows:	Consistent. The Project includes terraces, but not paseos, entry forecourts, courtyards, or plazas. According to the Table 7-3, terraces have no minimum containment.
Architectural Detail	
A. HORIZONTAL VARIATION	

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Vary the horizontal plane of a building to provide visual interest and enrich the pedestrian experience, while contributing to the quality and definition of the street wall.	Consistent. The Project will vary the horizontal plane of the building with design features, architectural elements, colors, textures, and windows, and comply with the requirements of the Broadway Design Guide.
1. Avoid extensive blank walls that would detract from the experience and appearance of an active streetscape.	Consistent. The Project will avoid blank walls, and comply with the requirements of the Broadway Design Guide.
2. Horizontal variation should be of an appropriate scale and reflect changes in the building uses or structure.	Consistent. The Project will vary the horizontal plane of the building to indicate the retail window space and building entries, and comply with the requirements of the Broadway Design Guide.
3. Vary details and materials horizontally to provide scale and three-dimensional qualities to the building.	Consistent. The Project will vary the horizontal plane of the building with design features, architectural elements, colors, textures, and windows, and comply with the requirements of the Broadway Design Guide.
4. While blank street wall façades are prohibited, an exception may be made for integration of public art or a graphic-based façade if it adds scale and interest to an otherwise bland frontage. In these cases, the façade should be a maximum of four floors high, and should have horizontal variation in its surface plane (using cut outs, insets or pop-outs). It should employ different scales of elements as viewed when seeing the entire building massing and as seen by pedestrians at a more intimate scale near the street.	Not Applicable. The Project will not include bank street walls or public art or graphic-based façade.
5. Provide well-marked entrances to cue access and use. Enhance all public entrances to a building or use through compatible architectural or graphic treatment. Main building entrances should read differently from retail storefronts, restaurants, and commercial entrances.	Consistent. The Project will include well-marked entrances to the retail space and lobby.
B. VERTICAL VARIATION	
Variation in the vertical plane of a building shall clarify the building’s uses and visually differentiate ground floor uses, from core functions and how the building “meets the sky.”	Consistent. The Project will vary the vertical plane of the building with architectural elements, colors, textures, and windows, and comply with the requirements of the Broadway Design Guide. There will be a visual distinction between the ground floor retail and upper level residential.
1. Employ a different architectural treatment on the ground floor façade than on the upper floors, and feature high quality materials that add scale, texture and variety at the pedestrian level.	Consistent. The Project will vary the vertical plane of the building with architectural elements, colors, textures, and windows, and comply with the requirements of the Broadway Design Guide. There will be a visual distinction between the ground floor retail and upper level residential.
2. Vertically articulate the street wall façade, establishing different treatment for the building’s	Consistent. The Project will vary the vertical plane of the building with

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base, middle and top) and use balconies, fenestration, or other elements to create an interesting pattern of projections and recesses.	windows, balconies on the tower levels, and other design features like color, materials, and textures.
3. Provide an identifiable break between the building’s ground floors and upper floors designed for office or other use. This break may include a change in material, change in fenestration pattern or similar means.	Consistent. There will be a visual distinction between the ground floor retail and upper level residential.
4. In order to respect existing historic datums, the cornice or roof line of historic structures should be reflected with a demarcation on new adjacent structures.	Consistent. The building will respect the adjacent historic structure (The Judson Building) with a demarcation.
5. Where appropriate, employ shade and shadow created by reveals, surface changes, overhangs and sunshades to provide sustainable benefits and visual interest on façades exposed to the sun.	Consistent. The Project will explore overhangs and sunshades to provide sustainable elements and visual interest to the sides exposed to the sun.
C. MATERIALS	
Buildings shall aim for a “timeless design” and employ sustainable materials and careful detailing that have proven longevity.	Consistent. The Project will be built to a modern design with sustainable materials, like metals and glass.
1. Feature long-lived and sustainable materials. The material palette should provide variety, reinforce massing and changes in the horizontal or vertical plane.	Consistent. The Project will include long-lived and sustainable materials like metals and glass to reinforce the massing and create variety in the horizontal and vertical plans.
2. Use especially durable materials on ground floor façades.	Consistent. The Project will include durable materials like metals and glass on the ground floor facades.
3. Generally, stucco is not permitted.	Consistent. The building will not include stucco.
4. Detail buildings with rigor and clarity to reinforce the architect’s design intentions and to help set a standard of quality to guide the built results.	Consistent. The building will contain details that reinforce the architect’s intentions and comply with the Broadway Design Guide.
5. To provide visual variety and depth, layer the building skin and provide a variety of textures that bear a direct relationship to the building’s massing and structural elements. The skin should reinforce the integrity of the design concept and the building’s structural elements, and not appear as surface pastiche.	Consistent. The building will include a variety of textures and layers from its materials.
6. Layering can also be achieved through extension of two adjacent building planes that are extended from the primary façade to provide a modern sculptural composition.	Not Applicable. The building will achieve layering and texture through its materials, not the extension of two adjacent building planes.
7. The building’s skin, especially for towers, should be primarily transparent.	Consistent. The building’s skin, including the tower will be primarily transparent from its windows.
8. Cut outs (often used to create sky gardens) should be an appropriate scale and provide a comfortable, usable outdoor space.	Not Applicable. The Project does not include cut outs.

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9. Design curtain walls with detail and texture, while employing the highest quality materials.	Consistent. Any curtain wall with include design details and texture.
10. Design the color palette for a building to reinforce building identity and complement changes in the horizontal or vertical plane.	Consistent. The building color palette will reinforce the building identity as a modern mixed-use building and implement changes in the horizontal and vertical plane.
D. WINDOWS AND DOORS	
Provide high-performance, well-detailed windows and doors that add to the depth and scale of the building's façade.	Consistent. Windows and doors will be high performance and well detailed, consistent with the Broadway Design Guide.
1. Window placement, size, material and style should help define a building's architectural style and integrity.	Consistent. Window placement, size, material, and style will define the buildings modern style, consistent with the Broadway Design Guide.
2. In buildings other than curtain wall buildings, windows shall be recessed (set back) from the exterior building wall, except where inappropriate to the building's architectural style. Generally, the required recess may not be accomplished by the use of plant-ons around the window.	Consistent. Windows will be recessed from the exterior building wall consistent with the Broadway Design Guide.
3. Windows and doors shall be well-detailed where they meet the exterior wall to provide adequate weather protection and to create a shadow line.	Consistent. Windows and doors will provide adequate weather protection.
E. GLAZING	
Incorporate glazing that contributes to a warm, inviting environment.	Consistent. Glazing will create a warm, inviting environment and be transparent and non reflective.
1. Ground-floor window and door glazing shall be transparent and non-reflective.	Consistent. Glazing will be transparent and non reflective.
2. Above the ground floor, both curtain wall and window/door glazing shall have the minimum reflectivity needed to achieve energy efficiency standards. Non-reflective coating or tints are preferred.	Consistent. Glazing will have the minimum reflectively needed to achieve energy efficiency standards and be non reflective.
3. A limited amount of translucent glazing may be used to provide privacy.	Consistent. Translucent glazing for privacy will be kept to a minimum, consistent with the Broadway Design Guide.
F. LIGHTING	
Provide well-designed architectural and landscape lighting.	Consistent. Lighting will highlight architecture and landscape features.
1. All exterior lighting (building and landscape) should be integrated with the building design, create a sense of safety, encourage pedestrian activity after dark, and support Downtown's vital nightlife.	Consistent. Exterior lighting will be integrated into the building design and provide safety and security for pedestrian activity.
2. Each project should develop a system or family of lighting with layers that contribute to the	Consistent. The Project will include a variety of lighting, such as façade

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night-time experience, including facade uplighting, sign and display window illumination, landscape, and streetscape lighting.	uplighting, sign and window display, and streetscape lighting
3. Architectural lighting should relate to the pedestrian and accentuate major architectural features.	Consistent. Lighting will accentuate the building's architectural features.
4. Landscape lighting should be of a character and scale that relates to the pedestrian and highlights special landscape features.	Consistent. Lighting will accentuate the building's landscape features.
5. Exterior lighting shall be shielded to reduce glare and eliminate light being cast into the night sky.	Consistent. Lighting will be shielded to reduce glare and illuminate light trespass and light pollution.
Security lighting	
6. Integrate security lighting into the architectural and landscape lighting system. Security lighting should not be distinguishable from the project's overall lighting system.	Consistent. Security lighting will be included and not be distinguishable from the overall lighting system.
7. Illuminate alleys for both vehicles and pedestrians.	Consistent. Lighting will illuminate Frank Court alley for the parking access.
G. SECURITY GRILLS AND ROLL-DOWN DOORS AND WINDOWS	
Balance the need for security doors and windows with the need to create an attractive, inviting environment.	Consistent. The Project will incorporate LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design"
1. Exterior roll-down doors and security grills are not permitted except as noted below.	Consistent. The Project will not include roll-down doors and security grills.
2. Subject to approval of the Reviewing Agency, interior roll-down doors and security grilles may be permitted, provided they are at least 75% transparent (open), retractable and designed to be fully screened from view during business hours.	Consistent. The Project will not include roll-down doors and security grills.
3. Subject to approval of the Reviewing Agency, exterior security grilles and roll-down doors may be permitted in the City Markets, provided they are designed to be fully screened from view during business hours.	Consistent. The Project will not include roll-down doors and security grills.
H. MINIMIZING IMPACTS ON NEIGHBORS	
Architecturally incorporate or arrange roof top elements to screen equipment such as mechanical units, antennas, or satellite dishes.	Consistent. The rooftop mechanical elements will be screened.
1. Mechanical equipment shall be either screened from public view or the equipment itself shall be integrated with the architectural design of the building.	Consistent. The rooftop mechanical elements will be screened.
2. Penthouses should be integrated with the buildings architecture, and not appear as foreign structures unrelated to the building they serve.	Consistent. The penthouse design will be incorporated into the rest of the building tower and consistent with the overall design.
3. Ventilation intakes/exhausts shall be located to minimize adverse effects on pedestrian	Consistent. Any ventilation intakes/exhausts will be located at a place and

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comfort along the sidewalk. Typically locating vents more than 20' vertically and horizontally from a sidewalk and directing the air flow away from the public realm will accomplish this objective.	height consistent with this standard to minimize effects on pedestrians. Thus the ventilation will be located at Frank Court alley.
4. Antennas or satellite dishes shall be screened.	Not Applicable. There are no antennas or satellite dishes.
Minimize glare upon adjacent properties and roadways.	Consistent. The Project will minimize glare according to Mitigation Measure 1-8.
5. Lighting (exterior building and landscape) shall be directed away from adjacent properties and roadways, and shielded as necessary. In particular, no light shall be directed at the window of a residential unit either within or adjacent to a project.	Consistent. The Project will shield lighting to prevent light trespass on adjacent properties, according to Mitigation Measure 1-7.
6. Reflective materials or other sources of glare (like polished metal surfaces) shall be designed or screened to not impact views nor result in measurable heat gain upon surrounding windows either within or adjacent to a project.	Consistent. The Project will be designed to not impact views or create measurable heat gain.
7. Other sources of glare, such as polished metal surfaces, shall be designed or screened to not impact views from surrounding windows.	Consistent. The Project will minimize glare according to Mitigation Measure 1-8.
Streetscape Improvements	
A. RESPONSIBILITIES OF THE CITY AND OTHER PUBLIC AGENCIES	
1. Recognize the shared use of streets not just for moving traffic, but equally as 1) the front door to businesses that are the economic and fiscal foundation of the City and 2) outdoor open space for residents and workers in a City that is severely lacking in public open space. That is, recognize that all streets on which residential or commercial development is located are "pedestrian-oriented streets" and design and improve them accordingly.	Not Applicable. This standard is the responsibility of the City and other public agencies.
2. Implement the standards and guidelines in this document that pertain to improvements within street rights-of-way, including sidewalk configuration and streetscape improvements.	Not Applicable. This standard is the responsibility of the City and other public agencies.
3. For improvement projects undertaken by public agencies, comply with the Downtown Street Standards and all standards and guidelines in this document, including sidewalk width, sidewalk configuration and streetscape improvements. In the case of sidewalk width, acquisition of rights-of-way or easements from adjacent property may be required.	Not Applicable. This standard is the responsibility of the City and other public agencies.
4. Do not unreasonably burden property owners, developers and business owners with complicated regulations and protracted processes.	Not Applicable. This standard is the responsibility of the City and other public agencies.
B. RESPONSIBILITIES OF THE DEVELOPER OR LEAD PUBLIC AGENCY	

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1. Provide sidewalks, parkways and walkways as specified in Section 3.	Consistent. The Project will provide wide sidewalks along Broadway and 4 th Street.
2. Install and maintain the improvements specified in this section.	Consistent. The Project will install and maintain improvements specific and under the responsibility of a private developer/property owner.
3. Execute a Maintenance Agreement with the City by which the developer or Lead Public Agency agrees to maintain the streetscape improvements and accepts liability for them.	Consistent. The Project will comply with this standard to the extent and amount required.
4. Install the ornamental street lighting specified in sub-section G and agree to an on-going assessment by the City to maintain and operate the lights.	Consistent. The Project will comply with this standard to the extent and amount required.
C. SIDEWALK IMPROVEMENT WHERE FUTURE ROADWAY WIDENING MAY OCCUR	
1. Where 1) a street dedication has been made in the past or is required at the time of development and 2) the roadway has not been widened, that portion of the sidewalk located in the potential future widening shall be the Temporary Sidewalk Zone.	Neutral. The Project will not conflict with this standard.
2. The Temporary Sidewalk Zone may not be included in the required sidewalk width.	Neutral. The Project will not conflict with this standard.
3. Street trees may not be planted in the Temporary Sidewalk Zone.	Consistent. The Project will not plant street trees in a Temporary Sidewalk Zone.
4. On streets where continuous landscaped parkways are required, develop the Temporary Sidewalk Zone as a landscaped parkway. Design the irrigation so that the portion in the Temporary Sidewalk Zone can be removed without damaging the irrigation in the remaining parkway.	Not Applicable. There would not be a landscaped parkway.
5. On streets where tree wells are required, pave the Temporary Sidewalk Zone as an extension of the permanent sidewalk with an expansion joint at the future back of curb.	Neutral. The Project will not conflict with this standard.
D. CURB EXTENSIONS AND CROSSWALKS	
1. Mid-block crosswalks shall be provided on all blocks 550' or longer, subject to approval by LADOT.	Neutral. The Project will not conflict with this standard. There is a midblock crosswalk across Broadway between 4 th and 5 th streets.
2. Curb extensions shall be provided at all corners and mid-block crossings, except at the intersection of two arterial streets (Major or Secondary Highways) and on streets where the curb lane is used as a peak-hour traffic lane, subject to approval by LADOT.	Consistent. The Project will comply with the Broadway Streetscape Plan.
E. PAVING PATTERN	
1. In the LASED Streetscape Plan area, the paving pattern specified in the adopted Streetscape	Not Applicable. The Project is not within the LASED Streetscape Plan.

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Plan shall be installed.	
2. On Hope Street the paving pattern used between Olympic Boulevard and 9th Street shall be installed.	Not Applicable. The Project is not on Hope Street.
3. In all other locations north of the 10 Freeway, the standard CRA/LA edge band shall be installed. The edge band detail is included in Appendix B.	Neutral. The Project will not conflict with this standard.
F. STREET TREES	
Tree Species and Spacing	
1. Street trees shall be planted in conjunction with each project. In-lieu fees are not permitted.	Consistent. The Project will plant street trees consistent with this standard.
2. Space trees as specified by City staff, but not more than an average of 25 feet on center to provide a more-or-less continuous canopy along the sidewalk.	Consistent. The Project will plant street trees consistent with this standard.
3. Spacing from other elements shall be as specified by the Urban Forestry Division (UFD)/Bureau of Street Services/Department of Public Works, except trees may be 6 feet from pedestrian lights. The Applicant shall agree to maintain the trees so that the pedestrian lights are accessible for maintenance purposes.	Consistent. The Project will plant street trees and maintain the trees consistent with this standard.
4. Trees shall be species/cultivars that will achieve a mature height, given site conditions, of at least 40 feet on Major Highways Class II and Secondary Highways and 30 feet on other streets with a mature canopy that can be pruned up to a height of 14 feet. Typically street trees will achieve about two-thirds of the mature height specified in Sunset Garden Book.	Consistent. The Project will plant street trees consistent with this standard.
5. Species/cultivars shall be as shown in the Master Tree List in the Appendices unless otherwise approved by the Reviewing Agency and UFD.	Consistent. The Project will plant the species/cultivars listed in the Downtown Design Guide Appendices and the Broadway Streetscape Plan.
6. Required street trees shall be shade trees. However, if approved by the Reviewing Agency and UFD, palms may be planted between or in addition to required shade trees.	Consistent. The Project will plant street trees consistent with this standard.
Planting Standards	
7. Plant minimum 36" box trees.	Consistent. The Project will plant street trees consistent with this standard.
8. Parkways shall be planted with: 1) turf or turf substitute that is level with the adjacent walkway and walkable or 2) groundcover or perennials at least 18 inches but not more than 3 feet tall, except within 2 feet of tree trunks.	Consistent. The Project will plant street trees consistent with this standard.
9. Where treewells are installed as permitted/specified in Section 3, treewells may be: 1) planted as described above; 2) covered with a 3-inch thick layer of stabilized decomposed granite, installed per manufacturer's specifications, and level with the adjacent walkway; or 3) covered	Consistent. The Project will plant street trees consistent with this standard.

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by a tree grate.	
10. Where gap-graded (structural) soil is required by Section 3, it shall be installed to a depth of at least 30 inches below the required miscellaneous base material under the concrete sidewalk for the entire length and width of the sidewalk adjacent to the project, except: 1) gap-graded soil is not required under driveways and 2) adjacent to existing buildings, the existing soil should be excavated at a 2:1 slope away from the building wall or as required by the Department of Building and Safety to avoid shoring of the building footing.	Neutral. The Project will not conflict with this standard.
11. Irrigate the trees and landscaped parkways with an automatic irrigation system. In-line drip irrigation (Netafim or equal) is preferred. Spray heads or bubblers may also be used provided they adequately irrigate trees (minimum of 20 gallons per week dispersed over the root zone) and do not directly spray the tree trunks.	Neutral. The Project will not conflict with this standard.
12. Maintain and prune street trees as specified by the Urban Forestry Division, including: obtain a permit prior to pruning and adhere to International Society of Arboriculture (ISA) Tree Pruning Guidelines and American National Standards Institute (ANSI) A300 standards. These guidelines prohibit “topping” and “heading.”	Neutral. The Project will not conflict with this standard.
G. STREET LIGHTS	
1. On streets having an established historic street light, continue the predominant street light pattern, modified as required by BSL to meet current illumination standards, using replicas of the historic street lights as specified by BSL. If a project includes roadway widening, refurbish and relocate the historic street lights with supplemental replicas as required by BSL.	Neutral. The Project will not conflict with this standard. The Project does not propose a roadway widening.
2. In other locations, pedestrian street lights, as specified by the Reviewing Agency and approved by BSL, shall be attached to each existing roadway light and a matching pedestrian light on a pole specified by the Reviewing Agency and approved by the BSL shall be installed approximately equidistant between the roadway lights. Pedestrian light spacing must be carefully coordinated with street tree planting in order to meet BSL spacing requirements and maintain the required tree spacing. An alternative street lighting pattern may be approved by the Reviewing Agency and BSL.	Neutral. The Project will not conflict with this standard.
3. Pedestrian street lights may be set back from the curb on wide sidewalks installed on private property as follows: <ul style="list-style-type: none"> • Where sidewalks are at least 24 feet wide, the pedestrian lights may be set back between the 	Neutral. The Project will not conflict with this standard.

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<p>clear path of travel and the commercial activity zone adjacent to the building.</p> <ul style="list-style-type: none"> • Where the building is set back from the sidewalk, the pedestrian street lights may be installed on poles directly adjacent to the back of sidewalk. • All light sources shall provide a warm (yellow, not blue) light if metal halide or high-pressure sodium or, preferably, LED lights that produce a similar quality of light. • All optic systems shall be cut-off. 	
<p>H. STREETSCAPE PROJECT APPROVAL AND PERMITS</p>	
<p>1. A-permit. The A-Permit is the first level of street improvement permits and is issued over the counter with no project plans. Items typically permitted through this type of review are new or improved driveways and sidewalks. A nominal fee may be charged for plan check, filing, and inspection.</p>	<p>Consistent. The Project would need an A-permit for the review of its new and improved driveways.</p>
<p>2. Revocable Permit. Revocable Permits are the second or mid-level of street improvement permits. Revocable permit applications require the submittal of professionally prepared drawings on standard City (Bureau of Engineering) drawing sheets and are reviewed by the various Bureaus within the Department of Public Works for safety and liability issues. Improvements approved through the Revocable Permit process are maintained by the permittee. Failure by the permittee to keep the improvement in a safe and maintained condition allows the City to revoke the permitting rights at which point a permittee is requested to restore the street to its original condition. Projects requiring approval through the Revocable Permit process include improvements within the public right-of-way that do not change the configuration of the street. A moderate fee is assessed for plan check, administrative filing, and inspection and the applicant is typically required to provide proof of liability insurance.</p>	<p>Not Applicable. The Project is not seeking a Revocable permit.</p>
<p>3. B-Permit. The B-Permit is reserved for streetscape projects requiring the highest level of review. Approval through the B-Permit process is required for projects that are permanent in nature and developed to a level that allows the City to maintain the improvement permanently. A B-Permit is usually issued for improvements that change the configuration of the street, traffic patterns, or other substantial permanent changes to the streetscape. Projects subject to the B-Permit review process require professionally prepared drawings submitted on standard City (Bureau of Engineering) drawing sheets and are reviewed by all public agencies affected by the improvements. A fee commensurate with development is assessed for plan check,</p>	<p>Not Applicable. The Project is not seeking a B-permit.</p>

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administration, and inspection. Construction bonding is required to ensure that the improvements are installed, and various levels of insurance are required.	
Signage	
Signage will be submitted at a later date, and is not included in this application.	
Public Art	
<p>A. GOALS Integrate public art in the overall vision of the project’s architecture, landscape and open space design by incorporating the artist into the design team early in the process. The goals are as follows:</p> <ul style="list-style-type: none"> • Artistic excellence. Aim for the highest aesthetic standards by enabling artists to create original and sustainable artwork, with attention to design, materials, construction, and location, and in keeping with the best practices in maintenance and conservation. • Image. Generate visual interest by creating focal points, meeting places, modifiers or definers that will enhance Downtown’s image locally, regionally, nationally and internationally. • Authentic sense of place. Enliven and enhance the unique quality of Downtown’s diverse visual and cultural environments. Provide meaningful opportunities for communities to participate in cultural planning, and a means for citizens to identify with each other through arts and culture in common areas. • Cultural literacy. Foster common currency for social and economic exchange between residents, and attract visitors by ensuring that they have access to visual ‘clues’ that will help them navigate and embrace a potentially unfamiliar environment. This can be achieved through promotional materials and tours as well as artwork. • Style. Artworks must demonstrate curatorial rigor in terms of building the city’s collection of public art and shall illustrate themes and levels of sophistication that are appropriate for their location. • Responsiveness. Without formally injecting art into the early stages of the planning process for each new development, it will either be left out, or appear out of sync with the overall growth of the built environment. 	<p>Neutral. The Project will not include public art on the private property. The Project would not conflict or preclude the placement of public art in the public right-of-way.</p>
<p>B. GENERAL GUIDELINES 1. All artwork erected in or placed upon City property must be approved by the Department of</p>	<p>Neutral. The Project will not include public art on the private property. The Project would not conflict or preclude the placement of public art in the</p>

Guidelines and Standards	Discussion
<p>Cultural Affairs, and in some cases may require a special maintenance agreement with the appropriate BID or similar community organization.</p> <p>2. Artwork in privately owned developments should be fully integrated into the development’s design, in the most accessible and visible locations. Enclosed lobbies and roof top gardens are considered appropriate locations.</p> <p>3. Artwork in retail streets and developments will need to be viewed in relation to existing signage and shop frontage.</p> <p>4. Attention must be paid to how the artwork will appear amidst mature landscape.</p> <p>5. Special care should be made to avoid locations where artworks may be damaged, such as the vehicular right of way.</p>	<p>public right-of-way.</p>
<p>C. CONTRIBUTING TO AN URBAN TRAIL</p> <p>Ideally, each Downtown neighborhood would develop an aesthetic “heart” with unique characteristics. It could be represented by a neighborhood boundary, main boulevard, business core or cultural corridor. The art that defines the heart can also branch out to offer connections that form an “Urban Trail.” This trail could provide physical and visible connections, a path of discovery using elements like:</p> <ul style="list-style-type: none"> • Icons and emblems • Civic buildings • Street furnishings • Plazas • Parks, paseos and courtyards • Façades • Transit hubs. 	<p>Neutral. The Project will not include public art on the private property. The Project would not conflict or preclude the placement of public art in the public right-of-way.</p>
<p>Civic and Cultural Life</p>	
<p>A. GOAL</p> <p>Every project should contribute to the civic and cultural life of the Downtown, building on and connecting to existing elements.</p>	<p>Consistent. The Project will contribute to the civic and cultural life of Downtown as described below.</p>
<p>B. GUIDELINE</p> <p>1. Describe how your project will:</p> <ul style="list-style-type: none"> • Contribute to the civic and cultural life of the Downtown. 	<p>Consistent. The Project will contribute to the civic and cultural life of Downtown by increasing the density of a prominent corner near regional mass transit and local uses. The new residents of the Project will activate the street</p>

Guidelines and Standards	Discussion
<ul style="list-style-type: none"> • Connect to existing elements illustrated on the map in Figure 12-1. 	<p>during the evening and night, outside of retail operating hours. The residents will also support and increase the area’s civic and cultural resources.</p> <p>The Project is near the following elements identified on Figure 12-1: Angels Flight, Grand Central Market, Mason Park, Broadway Pedestrian Activity, Arcade Building Paseo, Old Bank District outdoor cafes and street life, Monthly Art Walk.</p>
<p>Source: City of Los Angeles, Downtown Design Guide: http://urbandesignla.com/downtown_guidelines.htm Table: CAJA Environmental Services, September 2013.</p>	

Broadway Streetscape Master Plan

The Broadway Streetscape Master Plan was adopted by the City Planning Commission on February 14, 2013. The Plan describes the existing conditions, the vision or future for the street, materials for streetscape elements and improvements, and the implantation and phasing.⁹³

The Streetscape Plan shows the existing elements along Broadway, in front of the Project Site. There is a Vehicular Directional Signage, 3 permanent BID newspaper kiosks, one trashcan, 4 trees in planters, street lights, and a curb cut.⁹⁴ There are no identified open space opportunities such as paseos.

The Broadway streetscape from 4th Street to 6th Street is shown in Figure 4.10-1, Broadway Streetscape

The design principles are: keep it simple, avoid historic recreations, strive for high levels of transparency, create and highlight pedestrian connections, enhance perception of safety, lay the foundation for a timeless streetscape, create an environmentally responsible design, and stimulate private sector investment. The Project would not conflict with these design principles and would enhance or encourage several of them. The Project would create a pedestrian-friendly ground floor retail frontage that creates transparency and pedestrian connection from Bunker Hill to the Historic Core. The building would contain green and conservation design features to reduce water and energy usage, and include bicycle parking. The Project would be an example of private sector investment.

The Streetscape Plan describes the preferred standards, layouts, and materials for transit stops, curb extensions, crossings, driveways, street lighting, signage and wayfinding, landscaping, and street furniture. These items are implemented by various agencies and departments in the City of Los Angeles as well as Metro. The Project would not conflict with these items.

The Streetscape Plan is designed to enhance the pedestrian environment along Broadway, between 2nd Street and 11th Street, by providing wider sidewalks and curb extensions. To accommodate these improvements, the traffic lanes along this segment of Broadway will be reduced to two lanes in the northbound direction and one lane in the southbound direction. This segment of Broadway has also been identified as an alignment for the reintroduction of streetcar service that is currently being designed. The Los Angeles Department of Transportation (LADOT) recommends that the Applicant meet with LADOT and the Department of City Planning to determine the specific scope and schedule of the Broadway Streetscape Master Plan, to verify the required roadway and sidewalk dimensions, and to determine if

⁹³ *Broadway Streetscape Plan*: http://cityplanning.lacity.org/complan/othrplan/pdf/Broadway_StreetscapePlan.pdf

⁹⁴ *Broadway Streetscape Plan*, page 2-5:
http://cityplanning.lacity.org/complan/othrplan/pdf/Broadway_StreetscapePlan.pdf

there are any specific roadway and sidewalk modifications required along the Project's Broadway frontage.⁹⁵

Downtown Street Standards

The Downtown Street Standards was adopted by City Council on April 24, 2009. The Downtown Street Standards update the Central City Community Plan street designations based on a more comprehensive street hierarchy that balances traffic flow with other equally important functions of the street, including: pedestrian needs, public transit routes and stops, bicycle routes, historic districts with fixed building street walls, the public face and transitional "front yard" of businesses, pedestrian environments and linear open space considerations.

The Downtown Street Standards establish definitive future curb lines and property lines for all Downtown streets, and, in some locations, additional required average sidewalk easements. In combination with the Downtown Design Guide, the Downtown Street Standards will provide certainty for developers and their architects as to the building street wall location and required roadway improvements. It will also provide certainty for building, business and homeowners that the character of their street on which their investments are located will not be diminished by unanticipated future sidewalk narrowing.⁹⁶

The Project Site contains four parcels with a total Lot Area of 34,253 square feet (0.786 acres), prior to vacation of the 5 foot dedication on Broadway and 13 foot dedication on 4th Street. After the City vacates the 5 foot and 13 foot dedications, the total area would be 37,529 square feet (0.8615 acres).

The standards for Broadway and 4th Street are shown in Figure 4.10-2, Downtown Street Standards.

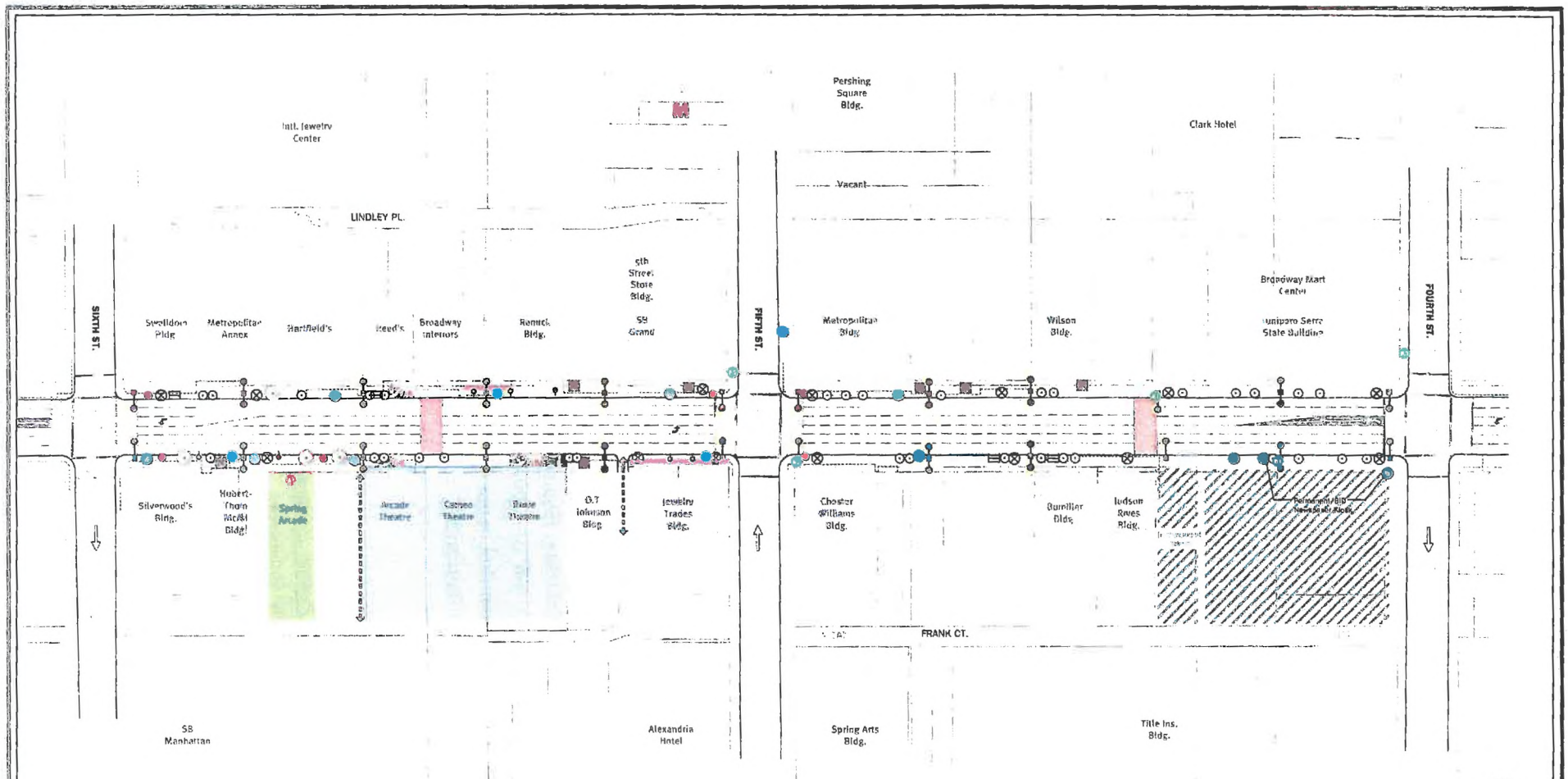
4th Street has been designated a Modified One-Way Secondary Highway, which requires a 20-foot half-width roadway within a 30-foot half-width right-of way.

Broadway was re-designated to a Modified Secondary Highway, which requires a 28-foot half-width roadway within a 40-foot half-width right-of-way and an additional 5-foot sidewalk easement. However, the roadway and sidewalk dimensions that are identified in the Broadway Streetscape Plan Master (2013), identified above, supersede the Downtown Street Standards.⁹⁷

⁹⁵ *Traffic Analysis for the Proposed Mixed-Use Project Located at 400 South Broadway*, Department of Transportation, September 25, 2013. Included in the Appendices.

⁹⁶ *Downtown Street Standards*: http://urbandesignla.com/UD_pdf/Downtown_Street_Standards.pdf

⁹⁷ *Traffic Analysis for the Proposed Mixed-Use Project Located at 400 South Broadway*, Department of Transportation, September 25, 2013. Included in the Appendices.



Existing Conditions Plan - Broadway from 4th Street to 6th Street

EXISTING STREETScape ELEMENTS

- Street Light
- Street Light (w/ Traffic Light)
- ⊕ Pedestrian Light
- ☐ Confirmed Existing Tree
- Empty Tree Pit
- Tree in Planter
- Bike Rack
- News Racks
- Newspaper/Magazine Kiosk
- ⊗ Trash Can
- ☐ Bench
- Bus Stop
- Crosswalk (Mid-Block)
- Intersection Treatments

EXISTING HISTORIC FABRIC

- Terrazzo
- Colored Concrete
- Glass Block
- Basement Access Hatch
- Basement Locations Underground
- Historic Theatres
- Historic Buildings (Nat'l Register)

OPEN SPACE & OPPORTUNITIES

- ↔ Pedestrian Paseo Opportunity
- Existing Open Space/Paseo
- Surface Parking
- ▨ Parking Structure/Garage
- Metro Rail Station

UTILITIES

- Fire Hydrant
- Curb Cut

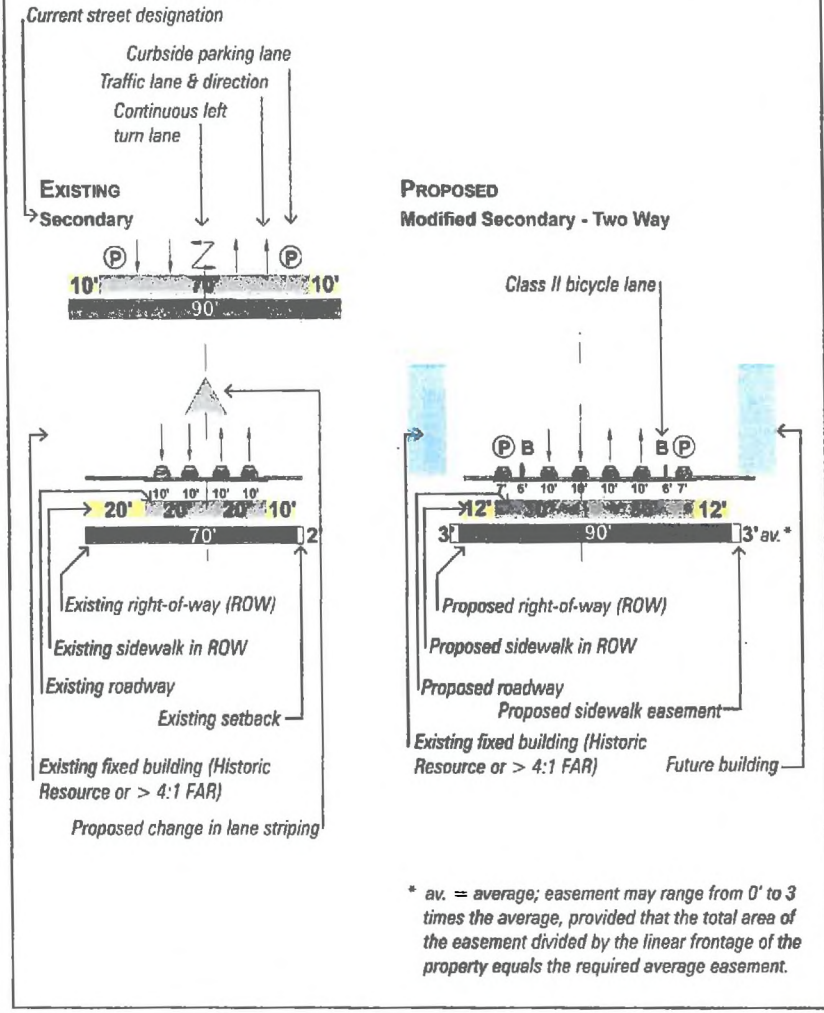
EXISTING SIGNAGE

- A1 Radio Tower
- B1 Vehicular Directional
- B2 Pedestrian Directional
- B3 District Marker ID
- B4 Route 66
- C1 Information Kiosk
- C2 Historical Area Map



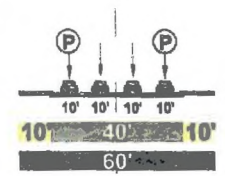
Source: Figure 2-2: 2009 Existing Conditions Plan – Broadway from 4th Street to 6th Street, Broadway Streetscape Master Plan, adopted by City Planning Commission February 14, 2013.

CROSS SECTION LEGEND



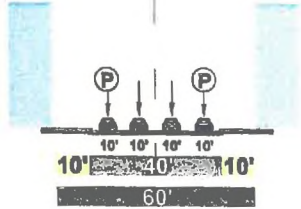
4TH STREET looking west
EXISTING

midblock Hill/Broadway - Main



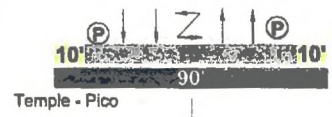
PROPOSED

Hill - Main

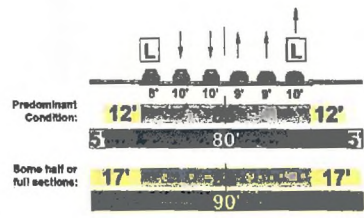


BROADWAY looking north
EXISTING

Secondary



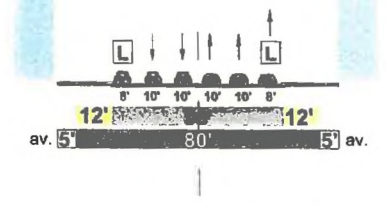
Temple - Pico



PROPOSED

Modified 2-Way Secondary

Temple - Olympic



Source: Downtown Street Standards, City of Los Angeles, adopted by City Council April 24, 2009.

City Center Redevelopment Project

The Project is within the City Center Redevelopment Project area,⁹⁸ administered by the CRA/LA⁹⁹ The purpose of the Redevelopment Project area is to, among other things, reduce blight, provide sites for business expansion and major new developments, and revitalization and redevelopment of the area.¹⁰⁰ The Project would create progress within the Redevelopment Project area by removing an existing retail use that could be blighted, and construct a new mixed-use development with housing and retail.

City of Los Angeles Planning and Zoning Code

The Site is zoned [Q]C4-4D-CDO:

- [Q] – Qualified Classification, or restrictions on a property as a result of a zone change, to ensure compatibility with surrounding property.
- C4 – Commercial Zone, which allows C2 uses with limitations, and R4 (Multiple Dwelling) uses.¹⁰¹
- 4 – Height District 4, which for a C zone, allows for 13:1 FAR (floor-area-ratio).
- D – Development Limitation, which restricts heights, percent of lot coverage, and building setbacks, and restricts the floor area ratio to 6:1.
- CDO – Community Design Overlay.¹⁰²

C4 zone allows retail and multi-family residential.

The CDO refers to the Broadway Theater and Entertainment District. The Project would comply with the goals and design principles of the Broadway Design Guide.

⁹⁸ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System*, search for 400 Broadway, website: <http://zimas.lacity.org/>.

⁹⁹ The CRA/LA is now the Designated Local Authority and the successor for the former Community Redevelopment Agency of Los Angeles.

¹⁰⁰ CRA/LA: http://www.crala.net/internet-site/Projects/City_Center/about.cfm

¹⁰¹ Generalized Summary of Zoning: http://cityplanning.lacity.org/zone_code/Appendices/sum_of_zone.pdf

¹⁰² Generalized Summary of Zoning Regulations, City of Los Angeles: http://cityplanning.lacity.org/zone_code/Appendices/sum_of_zone.pdf

The building will have 34 stories and a total height of 388'-0". There is no maximum height limit, per Height District 4 for C zone.

Transfer of Floor Area Rights (TFAR)

The Community Redevelopment Agency¹⁰³ and the City Planning Commission have established standards and approval procedures for the transfer of floor area (TFAR) in the Central Business District Redevelopment Project Area (Los Angeles Municipal Code Section 14.5.1, added by Ordinance No. 163,617). The TFAR allows the transfer of the unused allowable floor area of a lot from a donor site to a receiving site. Such a transfer can result in a project which exceeds the maximum floor area ratios and applicable height districts for receiving sites permitted by the zoning provided that the City Planning Commission can make the required findings.

The City Council, acting on recommendations of the City Planning Commission and the Redevelopment Agency Board, have the authority to grant transfers of floor area in excess of 50,000 square feet.¹⁰⁴

The Project is located within the boundaries of the Central Business District Redevelopment Project Area.¹⁰⁵ The Site is zoned [Q]C4-4D-CDO. If the Project is limited to a 6:1 FAR, then the maximum building floor area can be 225,174 square feet (assuming a maximum site area of 37,529 square feet, after vacation). The D in the zoning is a development limitation that reduces the permitted FAR to 6.0 times the buildable lot area, but potentially allows the transfer of development rights onto or off the subject site. The maximum FAR (floor-area-ratio) that can be obtained is 13:1, or 13 times the buildable lot area.¹⁰⁶ Thus the maximum building floor area can be 487,877 square feet (assuming a maximum site area of 37,529 square feet, after vacation).¹⁰⁷ The Project would be seeking a minimum transfer of 218,925 square feet of floor area development rights from the Convention Center to the Project Site. The Project FAR total would be 444,099 square feet for a FAR of 11.8:1.¹⁰⁸

¹⁰³ The CRA/LA is now the Designated Local Authority and the successor for the former Community Redevelopment Agency of Los Angeles.

¹⁰⁴ Central City Community Plan, page III-19: <http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF>

¹⁰⁵ CRA/LA, Central Business District map: http://www.crala.org/internet-site/Projects/CBD/cbd_map.cfm

¹⁰⁶ Central City Community Plan, Footnote 3 on Regional Center Commercial zone: "Corresponds to Height District 3-D and 4-D; D limitation to 6:1 FAR, except for transfer of floor area up to 10:1 or 13:1, respectively." <http://cityplanning.lacity.org/complan/central/ccypage.htm>

¹⁰⁷ $37,529 \times 13 = 487,877$

¹⁰⁸ $444,099 / 37,529 = 11.8$.

There would be a 0'-0" setback against the alley, a 0'-0" setback against the adjacent residential building (The Judson), and a 0'-0" setback along Broadway. There would be a 0'-0" setback along 4th Street.¹⁰⁹

The Project's open space requirement and amount provided are shown in Table 4.14-6, Project Open Space. The Project would be deficient of the open space requirement by 2,088 square feet. The Project is seeking a Director's Decision per LAMC Section 12.21 G.(3) to deviate from the code Open Space requirements by 2,088 square feet, from 48,975 square feet (as required by the code) to 46,887 square feet, as provided for the Project.

Parking for the Project will be provided within an on-site, 8-level parking structure (2 basement levels + 1 ground level + 5 above ground levels) containing a total of 450 parking spaces, which is 35 spaces in excess of code.

The Project would be requesting discretionary actions, as listed in Section 2, Project Description. These actions, along with the MND and Findings, would seek requests to allow a transfer of floor area rights (TFAR), a tentative Tract map, a deviation from the number of parking spaces defined in the Advisory Agency Policy Memo AA-2000-1, a Design Overlay Approval for the Broadway Design Overlay District, Site Plan Review, reduction in parking stall widths and lengths, parking drive aisle widths, deviation from code open space requirements, a haul route permit, and adoption of this MND.

Conclusion

The Project is consistent with the regional plans (SCAG) and local plans (City of Los Angeles), to the extent feasible and applicable, as discussed above. The Project would be in compliance goals, objectives, policies, and standards of the Broadway Design Guide and other applicable plans. As such, impacts with respect to applicable land use plans, policies and zoning would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan.

The Project Site is located in an urbanized area of the City. The Project Site is completely paved and developed with a commercial building.

There are no known natural communities identified in local or regional plans or policies or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service on the Project Site or in the project vicinity. The Project will not conflict with the provisions of an adopted Habitat

¹⁰⁹ HansonLA, Architects, Entitlement Submittal, January 10, 2014.

Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. Therefore, no impact to sensitive habitats or conservation plans will occur.

11. MINERAL RESOURCES

- a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction.

Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, is unavailable for extraction.¹¹⁰ MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.¹¹¹

Neither the Project Site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance.

Additionally, the Project Site is not located within an oil field or oil drilling area, and is not part of any Oil Drilling and Surface Mining Supplemental Use District.¹¹²

Furthermore, no oil wells exist or are known to have previously existed on the Project Site or the immediate surrounding area.¹¹³ The nearest well (API 03720494) was identified as plugged¹¹⁴ and was located on 6th Street, southeast of Los Angeles Street, approximately 1,500 feet south of the Site.

Therefore, no impacts to mineral resources of regional or statewide significance will occur.

¹¹⁰ City of Los Angeles Department of City Planning, *Conservation Element*, adopted September 2001, page II-58: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed August 19, 2013.

¹¹¹ City of Los Angeles Department of City Planning, *Conservation Element*, adopted September 2001, page II-59: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed August 19, 2013.

¹¹² City of Los Angeles Department of City Planning, *Safety Element Exhibit E, Oil Field and Oil Drilling Areas*: <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>, accessed August 19, 2013.

¹¹³ State of California Department of Conservation, *Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1*, website: <http://maps.conservation.ca.gov/doms/index.html>, August 19, 2013.

¹¹⁴ Division of Oil, Gas & Geothermal Resource, *Online Well Record Query*: <http://owr.conservation.ca.gov/Well/WellDetailPage.aspx?domsapp=1&apinum=03705188>, January 9, 2013.

- b) **Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction.

The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Site is surrounded by dense urban uses. Thus, the Site would not be an adequate candidate for mineral extraction.

Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

12. NOISE

The section is based in part on the following report:

Air Quality, Noise, and Greenhouse Gases Impact Report, Douglas Kim + Associates, September 2013.

- a) **Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Unless Mitigation Incorporated. A discussion of the project’s noise impacts is included below.

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The “A-weighted scale,” abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table 4.12-1, A-Weighted Decibel Scale, provides examples of A-weighted noise levels from common sources.

**Table 4.12-1
A-Weighted Decibel Scale**

Typical A-Weighted Sound Levels	Sound Levels (dBA, L _{eq})
Threshold of pain	140
Jet takeoff at 100 meters	125
Jackhammer at 15 meters	95
Heavy diesel truck at 15 meters	85
Conversation at 1 meter	60
Soft whisper at 2 meters	35

*SOURCE: United States Occupational Safety & Health Administration, Noise and Hearing Conversation Technical Manual, 1999.
From Table 4-1 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Noise Definitions

The noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration,

single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

- **Equivalent Noise Level.** L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Small perceptible changes in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely cause a community reaction. A 10-dBA increase is heard as a doubling in loudness and would cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance.

Noise is most audible when traveling by direct line-of-sight.¹¹⁵ Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver can greatly reduce noise levels from the source

¹¹⁵Line-of-sight is a visual path between the noise source and the noise receptor.

since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Applicable Regulations

The City of Los Angeles Municipal Code (LAMC) has established both construction and operation noise regulations. Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet there from:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;
- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.¹¹⁶

The State Department of Health Services has established guidelines for acceptable exterior noise levels for each county and city. These standards and criteria are incorporated into the land use planning process to reduce future noise and land use incompatibilities. Table 4.12-2, Land Use Compatibility for Community Noise Environments is the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise.

State interior noise standards were established in 1974, when the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (Title 24, Part 2, California Code of Regulations). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels of 60 dB Day-Night Average Noise Level (Ldn) or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB Ldn for any habitable room.

¹¹⁶City of Los Angeles, Municipal Code, 1986.

**Table 4.12-2
Land Use Compatibility for Community Noise Environments**

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU		CU	
Residential – Multi-Family	NA							
		CA						
					NU		CU	
Transient Lodging – Motels, Hotels	NA							
		CA						
					NU		CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
		CA						
					NU		CU	
Auditoriums, Concert Halls, Amphitheaters	CA							
						CU		
Sports Arenas, Outdoor Spectator Sports	CA							
						CU		
Playgrounds, Neighborhood Parks	NA							
					NU			
							CU	
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
					NU			
							CU	
Office Buildings, Business Commercial and Professional	NA							
				CA				
							NU	
Industrial, Manufacturing, Utilities, Agriculture	NA							
				CA				
							NU	

NA = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

CA = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

NU = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

*Source: California Office of Noise Control, Department of Health Services.
From Table 4-2 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Existing Noise Environment

The existing noise environment of the project area is characterized by vehicular traffic along Broadway, 4th Street, and 5th Street. Vehicular traffic is the primary source of noise in the project vicinity.

Sound measurements were taken using a SoundPro DL Sound Level Meter between 11:29 a.m. and 1:48 p.m. on August 13, 2013 to determine existing ambient daytime off-peak noise levels. These readings establish existing ambient noise conditions and provide a baseline for evaluating construction and operational noise impacts.

As shown in Table 4.12-3, existing ambient sound levels range between 64.8 and 68.8 dBA L_{eq}.

The location of the measurements is shown in Figure 4.12-1, Noise Measurements Locations.

**Table 4.12-3
Existing Noise Levels**

Location #	Noise Monitoring Location	Distance from Project Site (feet)	Sound Level (dBA, L _{eq})
1	424 S. Broadway	5	68.8
2	300 Spring	660	67.2
3	Pershing Square	680	68.5
4	Angel's Knoll	530	64.8

*Source: DKA Planning, 2013.
From Table 4-3 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and

may warrant unique measures for protection from intruding noise. Sensitive receptors near the project site include the following:

- Several multi-family residences within a quarter mile of the proposed project site. The nearest of these is the property adjacent to the project, which is located at 424 S. Broadway. There are also multi-family residences 270 feet to the southwest, 400 feet to the south, and 440 feet to the southwest of the project site.
- Angel's Knoll located 530 feet to the northwest of the project site.
- Cal-Tot Child Care Center located 660 feet to the northeast of the project site.
- Pershing Square located 680 feet to the southwest of the project site.

The above sensitive receptors represent the nearest receptors with the potential to be impacted by the proposed project. Additional sensitive receptors are located in the surrounding community within one-quarter mile of the project site, but they are farther away from the project site and therefore would be less impacted by the proposed project than the above sensitive receptors.



Source: Air Quality, Noise, and Greenhouse Gases Impact Report, Douglas Kim + Associates, September 2013.

Vehicular Traffic

Vehicular traffic is the predominant noise source in the project vicinity. Using existing traffic volumes provided by the project traffic consultant, TNM 2.5, and the Federal Highway Administration (FHWA) RD-77-108 noise calculation formulas, the CNEL was calculated for various roadway segments near the project site. Existing weekday and weekend mobile noise levels are shown in Table 4.12-3.

As shown in Table 4.12-4, Existing Estimated Peak Hour Mobile Source Noise Level, mobile noise levels in the project area range from 63.4 to 68.4 dBA L_{eq} .

**Table 4.12-4
Existing Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Estimated Leq (dBA) A.M. Peak	Estimated Leq (dBA) P.M. Peak
Spring Street between 4 th Street and 5 th Street	64.5	63.4
Broadway between 4 th Street and 5 th Street	64.8	66.0
Hill Street between 4 th Street and 5 th Street	68.1	68.4
5 th Street between Hill Street and Broadway	67.7	67.4
<i>Source: DKA Planning, 2013. From Table 4-4 of Air Quality, Noise, and Greenhouse Gases Impact Report.</i>		

Methodology

The noise analysis considers operational noise and vibration sources. Operational noise levels were calculated using the FHWA Traffic Noise Model (TNM) Version 2.5. The calculations are for a straight roadway over flat ground, with a receiver set at a height of five feet (1.5 meters) above the ground. Stationary source noise levels were calculated based on available technical data. Vibration levels were estimated based on information provided by the FTA.¹¹⁷

Noise Significance Criteria

Construction Phase Significance Criteria

Based on the City of Los Angeles CEQA Thresholds Guide, the proposed project would result in significant noise impacts if:

- Construction activities occur between 9 p.m. and 7 a.m. Monday through Friday, before 8 a.m. or after 6 p.m. on Saturday, or anytime on Sunday;

¹¹⁷Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use; or
- Construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

Operational Phase Significance Criteria

A significant operational noise impact would result if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, as shown in Table 4.12-2, or any 5 dBA or greater noise increase.

Project Impacts

Construction

Construction activity would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Typical noise levels from various types of equipment that may be used during construction are listed in Table 4.12-5, Maximum Noise Levels of Construction Machines. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.

The noise levels shown in Table 4.12-6, Typical Outdoor Construction Noise Levels, take into account the likelihood that more than one piece of construction equipment would be in operation at the same time.

The highest noise levels are anticipated to occur during the grading and finishing phases of construction. A typical piece of high noise equipment is assumed to generate up to 89 dBA L_{eq} at a reference distance of 50 feet.

**Table 4.12-5
Maximum Noise Levels of Construction Machines**

Noise Source	Noise Level (dBA)	
	50 feet	100 feet ¹
Front Loader	80	72.5
Trucks	89	81.5
Cranes (derrick)	88	80.5
Jackhammers	90	82.5
Generators	77	69.5
Back Hoe	84	76.5
Tractor	88	80.5
Scraper/Grader	87	79.5
Paver	87	79.5
Impact Pile Driving	101	93.5
Auger Drilling	77	69.5

¹ Assumed a hard-site attenuation rate of 6 dB for every doubling of distance.
 Source :USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, 1971.*
 From Table 4-5 of *Air Quality, Noise, and Greenhouse Gases Impact Report.*

**Table 4.12-6
Typical Outdoor Construction Noise Levels**

Construction Phase	Noise Level At 50 Feet (dBA)
Ground Clearing	84
Grading/Excavation	89
Foundations	78
Structural	85
Finishing	89

Source: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, 1971.*
 From Table 4-6 of *Air Quality, Noise, and Greenhouse Gases Impact Report.*

Table 4.12-7, Construction Noise Levels, shows construction noise levels and increases resulting from construction. The nearest sensitive receptors are multi-family residences to the south of the project site at 424 South Broadway. The exterior of this property is located as near as 5 feet from the Project construction boundary.

Construction activities for the proposed project would occur between the hours of 7:00 a.m. and 6:00 p.m. in accordance with the City of Los Angeles Municipal Code. The Project would increase noise levels by more than 5 dBA to above a 75 dBA ambient noise level at the exterior of the adjacent multi-family housing at 424 South Broadway.

With the incorporation of the mitigation measures below, noise impacts related to construction would be mitigated to a less than significant level.

**Table 4.12-7
Construction Noise Levels**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L _{eq})	New Ambient (dBA, L _{eq})	Increase
424 S. Broadway	5	83.0	68.8	83.2	14.4
315 W 5 th Street	270	68.4	68.8	71.6	2.8
460 S Spring	400	61.9	68.8	69.6	0.8
312 W 5 th Street	440	61.1	68.5	69.2	0.7
Angel's Knoll	530	59.5	64.8	65.9	1.1
Cal-Tot Child Care Center	660	57.6	67.2	67.7	0.5
Pershing Square	680	55.8	68.5	68.7	0.2

Source: DKA Planning, 2013.
From Table 4-7 of Air Quality, Noise, and Greenhouse Gases Impact Report.

Mitigation Measures

Construction Phase

12-1 Construction staging areas shall be as far from the adjacent multi-family residences at 424 South Broadway as possible.

12-2 Increased Noise Levels (Sound Barrier)

Temporary sound barriers, capable of achieving a sound attenuation of at least 9 dBA (e.g., construction sound wall or sound blankets) and blocking the line-of-sight between the adjacent

sensitive receptors shall be installed on the southern boundary of the project site between the proposed project and the Judson Rives Building, located at 424 South Broadway. The barrier shall be tall enough to block the line of site from the top of the windows on the Judson Rives Building to any excavation activities facing the Judson Rives Building. The barrier shall have a Sound Transmission Class of 35 or more and include exterior grade acoustical blankets that provide sound absorption and further reduce the reflection of sound waves.

12-3 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- 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.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Impacts After Mitigation

As shown in Table 4.12-8, Mitigated Construction Noise Levels, construction noise levels after mitigation would be reduced at nearby sensitive receptors to less than 75 dBA with implementation of **Mitigation Measures 12-1** through **12-3**. Construction equipment would intermittently cause audible noise increases at adjacent residential housing, however these increases would be temporary, and construction noise would be within the noise standards outlined in the LAMC.

Implementation of **Mitigation Measures 12-1** through **12-3** would reduce construction noise impacts to less-than-significant levels.

**Table 4.12-8
Mitigated Construction Noise Levels**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L _{eq})	New Ambient (dBA, L _{eq})	Increase
424 S. Broadway	5	71.0	68.8	73.0	4.2
315 W 5 th Street	270	56.4	68.8	69.0	0.2
460 S Spring	400	49.9	68.8	68.9	0.1

**Table 4.12-8
Mitigated Construction Noise Levels**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L _{eq})	New Ambient (dBA, L _{eq})	Increase
312 W 5 th Street	440	49.1	68.5	68.5	0.0
Angel's Knoll	530	47.5	64.8	64.9	0.1
Cal-Tot Child Care Center	660	56.8	67.2	67.6	0.4
Pershing Square	680	55.2	68.5	68.7	0.2

*Source: DKA Planning, 2013.
From Table 4-8 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Operation

Vehicular Noise. The proposed project would generate a net increase of 2,266 trips per day.¹¹⁸ To determine off-site noise impacts, traffic was modeled under future year (2017) no project and with project conditions utilizing the FHWA TNM 2.5 model. AM and PM peak hour results of the analysis are summarized in Tables 4.12-9 and 4.12-10. The greatest project-related noise increases would be 0.3 dBA L_{eq} along Spring Street, between 4th Street and 5th Street during the AM peak hour.

Mobile noise generated by the proposed project would not cause the ambient noise level measured at the property line of the affected uses to rise to the “normally unacceptable” or “clearly unacceptable” category (Table 4.12-2) or result in any 5-dBA or more increase in noise level. Vehicular noise would result in a less-than-significant impact.

**Table 4.12-9
2013 Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL		
		No Project (2013)	Project (2013)	Project Impact
Spring Street between 4 th Street and 5 th Street	AM	64.5	64.8	0.3
	PM	63.4	63.6	0.2
Broadway between 4 th Street and 5 th Street	AM	64.8	64.9	0.1
	PM	66.0	66.1	0.1
Hill Street	AM	68.1	68.1	0.0

¹¹⁸ Crain & Associates, *Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, August 2013.*

**Table 4.12-9
2013 Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL		
		No Project (2013)	Project (2013)	Project Impact
Between 4 th Street and 5 th Street	PM	68.4	68.5	0.1
5 th Street	AM	67.7	68.0	0.3
Between Hill Street and Broadway	PM	67.4	67.5	0.1

*Source: DKA Planning, 2013.
From Table 4-9 and 4-10 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

**Table 4.12-10
2017 Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL		
		No Project (2017)	Project (2017)	Project Impact
Spring Street between 4 th Street and 5 th Street	AM	65.5	65.7	0.2
	PM	65.1	65.2	0.1
Broadway between 4 th Street and 5 th Street	AM	64.4	64.5	0.1
	PM	66.0	66.1	0.1
Hill Street Between 4 th Street and 5 th Street	AM	69.1	69.2	0.1
	PM	69.6	69.6	0.0
5 th Street Between Hill Street and Broadway	AM	68.4	68.6	0.2
	PM	68.3	68.4	0.1

*Source: DKA Planning, 2013.
From Table 4-11 and 4-12 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Parking Noise. The proposed project would be built on a site that is currently occupied in part by an at-grade parking garage. Parking noise is typically generated by independent car door slams, and rarely by simultaneous door slamming. Because the existing site already has parking and commercial loading activity around the perimeter of the site, street parking noise would not increase ambient noise at nearby sensitive receptors. Additional parking is limited to both an underground structure, as well as above ground structure. Underground and enclosed parking structure noise is generally not audible, and was not audible at similar parking structures observed on both Spring Street and Broadway. Because the future on-site parking will be enclosed and have some levels underground, there could be a slight reduction in on-site parking noise. However, there could be noise from cars using the parking ramp. Therefore, **Mitigation Measure 12-4** would be required. As a result, parking noise would be considered a less-than-significant impact.

Stationary Noise. Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and air conditioning (HVAC) systems typically generate noise levels between 50 and 65 dBA at 50 feet.^{119, 120} Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet.¹²¹ The proposed project would have roof-top mounted HVAC systems. The nearest land use would be the residences located approximately 5 feet south of the proposed project site. This residential use would experience an inaudible 0.6 dBA increase in ambient noise. This increase is less than the 5 dBA significance threshold for long-term ambient noise increases. Therefore, stationary noise would result in a less-than-significant impact.

Land Use Compatibility. The proposed project would locate new noise-sensitive receptors in the project site. Due to the occupation of the current site and lack of vacant area to securely set-up an outdoor noise meter, it was not possible to obtain accurate 24-hour ambient noise readings for the project site. However, the proposed project site is located in an area that is adjacent to and surrounded by existing multi-family residences, and recently approved construction of multi-family residences, and is therefore subject to similar ambient noise levels.¹²²

For these existing and new-construction projects to be constructed, the existing sound level for in the project area must be considered normally or conditionally acceptable by the standards set by The California State Department of Health Services (Table 4.12-2). For new construction to be in compliance with California Noise Insulation Standards (California Code of Regulations, Title 24), conventional building construction and features such as single-glazed windows and fresh air supply system or air conditioning will be included in the project design, and provide a minimum noise reduction of approximately 24 dBA.¹²³ Because new sensitive receptors would be sited in an environment that is considered normally or conditionally acceptable by the City of Los Angeles, and the Project would comply with Title 24 regulations, noise resulting from the surrounding noise environment is considered a less-than-significant impact.

¹¹⁹ Los Angeles Department of City Planning, *San Pedro Community Plan Draft EIR*, August 2012.

¹²⁰ To be conservative, a reference noise of 65 dBA at 50 feet was used in this analysis.

¹²¹ Los Angeles Department of City Planning, *Androna Avenue Subdivision – Tentative Tract No. 53426 Subsequent Draft EIR*, February 2010.

¹²² Crain & Associates, *Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project*, City of Los Angeles, pages 39-42, August 2013.

¹²³ Federal Highway Administration, *Noise Reduction Design Procedure*, March 2008.

Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site retail uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by **Mitigation Measure 12-5**.

Mitigation Measures

Operational Phase Noise

12-4 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.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

12-5 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

Impacts After Mitigation

The project-related operational noise would be less-than-significant.

- b) **Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

Potentially Significant Unless Mitigation Incorporated. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and construction activities.

Vibration Definitions

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation

(Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.¹²⁴

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.¹²⁵ Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Applicable Regulations

To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage.¹²⁶

The FTA has also established guidelines that provide thresholds for ground-borne vibration causing human annoyance. For residential land uses, which experience occasional events of ground-borne vibration or noise, the FTA has established a threshold of 75 VdB.¹²⁷ Some commercial buildings, such as auditoriums and theaters have additional vibration and noise annoyance criteria. The FTA vibration and noise annoyance threshold for a theater with occasional or infrequent events is 80 VdB.

For evaluating potential annoyance or interference with vibration-sensitive activities due to construction vibration, the above criteria can be applied. In most cases, however, the primary concern regarding

¹²⁴Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

¹²⁵Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

¹²⁶Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

¹²⁷Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

construction vibration relates to potential damage effects. Guideline vibration damage criteria for engineered concrete and masonry buildings, vibration levels up to 0.3 inches per second can be experienced without causing structural damage. Vibration damage criteria for non-engineered timber and masonry buildings are up to 0.2 inches per second.¹²⁸

Existing Vibration Environment

There are no stationary sources of vibration located near the Project Site. Heavy-duty trucks can generate ground-borne vibrations that vary depending on vehicle type and weight, and pavement conditions. However, vibration levels from adjacent roadways are not typically perceptible at the project site.

Ground-borne Vibration Significance Criteria

There are no adopted State or City of Los Angeles ground-borne vibration standards. Based on federal guidelines, the proposed project would result in a significant construction or operational vibration impact if:

- The proposed project would expose buildings to the FTA building damage threshold level of 0.3 inches per second.
- The proposed project would expose residential land uses to a vibration and noise level of 75 VdB.

Project Impacts

Construction Phase Ground-borne Vibration Impacts

General Construction Activity

The highest vibration-generating piece of equipment to be utilized on the project site during construction is a large bulldozer. As shown in Table 4.12-11, Vibration Velocities for Construction Equipment heavy equipment (e.g., a bulldozer) generates vibration levels of up to 0.089 ppv at a distance of 25 feet. In addition, there will be added truck traffic to the haul route exiting the Project Site; however, on-road truck vibration is not typically perceptible.

The nearest residential structures to the Project Site would be approximately 10 feet from the construction boundary, where occasional heavy equipment activity would occur and would experience vibration levels up to 0.995 inches per second. While the Judson is located closer to the Project site than 10 feet, it is assumed the equipment (engine) would not go right to the property line during construction, due to precision and maneuverability of the larger pieces of equipment.

¹²⁸Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

This impact exceeds the potential building damage threshold of 0.3 inches per second. Additionally, vibration annoyance levels would be approximately 108 VdB at this distance, and would exceed the 75 VdB threshold for residential land uses.

Therefore, the Project would result in a significant impact, however incorporation of the mitigation measures below will reduce impacts to a less-than-significant level.

Table 4.12-11
Vibration Velocities for Construction Equipment

Equipment	PPV at 25 feet (Inches/Second)	Approximate L _v at 25 feet
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Vibratory Roller	0.210	94

*Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.
From Table 4-13 of Air Quality, Noise, and Greenhouse Gases Impact Report.*

Mitigation Measures

Construction Phase Ground-borne Vibration

12-6 Temporary Groundborne Vibration Impacts During Construction

- All new construction work shall be performed so as not to adversely affect the historic designation of the Judson Building located immediately adjacent to the site at 424 South Broadway. Preconstruction surveys shall be performed to document conditions of the adjacent historic structure. The structural monitoring program shall be implemented and recorded during construction.
- The performance standards of the structure monitoring plan shall include the following:
 - Documentation shall consist of videos and/or photographs of accessible and visible areas on the exterior and select interior facades of the building. A registered civil engineer or certified engineering geologist 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 historic resources 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.
 - The structure monitoring program shall be submitted to the Department of City Planning, the Office of Historic Resources, and the Department of Building and

Safety and received into the case file for the associated discretionary action permitting the project prior to initiating any construction activities.

- The Applicant shall retain a qualified vibration consultant to take vibration monitoring measurements regularly in order to assess the actual impact of vibration on adjacent structures and to incorporate and adjust techniques as necessary to reduce impact.
- The Applicant shall retain an experienced vibration engineer to plan for and monitor vibration impacts on the adjacent historic Judson building during site clearing, earthmoving and foundation construction, and structural construction, to the extent that the adjacent historic Judson building allows the Applicant to conduct monitoring within the building and to understand the baseline vibration impacts prior to site-clearing. The engineer shall insure the incorporation of maximum vibration mitigation into every phase of Project development.

12-7 Increased Groundborne Vibration (Demolition, Grading and Construction Activities)

- Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible.
- The construction contractor shall stage and warm-up construction equipment as far from nearby sensitive receptors as possible.
- The construction contractor shall avoid utilizing high vibration construction equipment (e.g. large bulldozers) near surrounding sensitive receptors, to the maximum extent feasible.
- The construction contractor shall avoid using vibratory rollers and packers near sensitive areas.
- The construction contractor shall avoid impact pile-driving where possible. The construction contractor shall use drilled piles or the use of a sonic or vibratory pile driver where geological conditions permit their use.

Impacts After Mitigation

With **Mitigation Measure 12-6** and **12-7**, vibration levels at nearby sensitive receptors would be monitored and potential impacts would be reduced to a less than significant level.

Operational Phase Ground-borne Vibration Impacts

The Project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, project-related traffic vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would be considered a less-than-significant impact.

Mitigation Measure

Operational ground-borne vibration impacts would be less than significant, and no mitigation measures are required.

Impacts After Mitigation

Not applicable. The project-related operational ground-borne vibration would result in a less-than-significant impact without mitigation.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The majority of any long-term noise impacts will come from traffic traveling to and from the area. When calculating future traffic impacts, the traffic consultant took 44 additional projects into consideration. Thus, the future traffic results without and with the Project already account for the cumulative impacts from these other related projects. Since the noise impacts are generated directly from the traffic analysis results, the future without Project and future with Project noise impacts already reflect cumulative impacts.

During long-term operation of the project, noise generated by the new vehicle trips per day was modeled under future year (2017) no project and Project conditions.

As shown in Table 4.12-12, Estimated Peak Hour Mobile Source Noise Levels, the maximum cumulative roadway noise increase would be 0.2 dBA L_{eq} and would occur along Spring Street between 4th Street and 5th Street, and along 5th Street between Hill Street and Broadway during the AM peak hour. This would be less than the 5-dBA significance threshold, and cumulative mobile noise would result in a less-than-significant impact.

The project would also contribute to cumulative increases in vibration from new development in the area. The predominant vibration source near the project site is heavy trucks traveling on local roadways. Neither the proposed project nor related projects would substantially increase heavy-duty vehicle traffic near the project site and would not cause a substantial increase in heavy-duty trucks on local roadways. The Project would not add to a significant cumulative vibration impact.

Operation of the building would be a permanent addition to the area. However, vehicular noise, parking noise, and stationary noise from the Project would result in a less-than-significant impact with the implementation of the mitigation measures listed above.

- d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Unless Mitigation Incorporated. Construction of the Project would contribute to cumulative construction noise levels. There are eight related projects that are proposed that could cause an increase in ambient noise at nearby sensitive receptors if construction were to occur simultaneously with the Project in this already urbanized area of the City. However, each of these projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. Each Project would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With conformance with LAMC Sections 41.40 and 112.05, and incorporation of Mitigation Measures 12-1 through 12-7, provided above, the Project's cumulative construction noise impact would be less than significant.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The nearest airports are Los Angeles International Airport (LAX) located 11 miles southwest, Santa Monica Airport located 11 miles west, Bob Hope-Burbank Airport located 11 miles northwest. Therefore no impact would occur.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would expose people residing or working in the project area to excessive noise levels. There are no nearby private airstrips. Therefore, no impacts will occur.

13. POPULATION AND HOUSING

- a) **Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region’s existing labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

The Project would remove a 14,000 square feet commercial building with retail. The Project would construct a new residential and retail mixed use development. The Project would include 450 residential units and 6,904 square feet of ground floor retail.

Population generation is shown in Table 4.13-1 and employee generation is shown in Table 4.13-2. It is estimated that the Project would generate approximately 693 residents and a deficit of 19 employees, after the removal of the existing retail uses.

**Table 4.13-1
Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
Project			
Residential	450 DU	1.54 person / DU	693
Total Increase in Population			693
<i>Note: DU = dwelling unit</i>			
<i>Source: Central City Community Plan, page I-3: http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF</i>			
<i>Table: CAJA Environmental Services, August 2013.</i>			

**Table 4.13-2
Project Estimated Employment Generation**

Land Use	Size	Employee Generation Rates	Total Employees
Existing			
Retail (to be removed)	14,000 sf	2.71 employees / 1,000 sf	(38)
Project			
Retail	6,904 sf	2.71 employees / 1,000 sf	19
Total Increase in Employees			(19)
<i>Note: sf = square feet</i> <i>Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11, Neighborhood Shopping Center category.</i> <i>Table: CAJA Environmental Services, August 2013.</i>			

Localized Growth Forecasts

Table 4.13-3 shows the existing (2010) population, housing, and employment of the Central City Community Plan.

Table 4.13-4 shows the Southern California Association of Government’s (SCAG) Adopted Growth Forecast, or planned growth of the City of Los Angeles in population, housing, and employment to 2020.

Table 4.13-5, Census 2010 Population, shows the 2010 population for the Census tracts of, and immediately around the Project Site.

Table 4.13-6, shows the California Department of Finance population and housing for the City in 2010 and 2013.¹²⁹

The Project’s 693 residents and 450 new dwelling units would be well within SCAG estimates of growth for the City between 2012 and 2020. The Project would represent a negligible percent of the estimated 2013 population and housing units in the City. The Project represents 4.7% of the 2010 Census population and 3.86% of the 2010 Census housing units in the immediate and adjacent tracts.¹³⁰ Thus, it does not represent a substantial or significant growth as compared to the existing characteristics.

¹²⁹ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2013. Sacramento, California, May 2013: <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>

¹³⁰ Population: $693 / 14,754 \times 100\% = 4.7\%$. Housing Units: $450 / 11,669 \times 100\% = 3.86\%$.

The Project would result in a less than significant impact with respect to population, housing, and employment growth.

**Table 4.13-3
Population, Housing and Employment of the Community Plan**

	Population	Housing (units)	Employment (jobs)
2010	27,029	16,457	61,500

*Central City Community Plan, page II-3: <http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF>
Table: CAJA Environmental Services, June 2013.*

**Table 4.13-4
Population, Housing and Employment of the City of Los Angeles**

	Population	Housing (units)	Employment (jobs)
2012	3,825,297	1,418,581	1,688,584
2020	3,991,700	1,455,700	1,817,700
Change (2012-2020)	+166,403	+37,119	+29,116

*2012: SCAG Local Profile for City of Los Angeles, dated May 2013: <http://www.scag.ca.gov/Documents/LosAngeles.pdf>
2020: RTP, Growth Forecast,, adopted April 2012: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf
Table: CAJA Environmental Services, April 2014.*

**Table 4.13-5
Census 2010 Population**

Tract	Location	Population	Housing Units
2073.01	Contains Project Site	4,521	3,932
2073.02	Southeast of 2073.01	3,791	3,286
2075.02	Northwest of 2073.01	2,589	2,043
2077.10	Southwest of 2075.02	2,490	2,376
2074.00	Northeast of 2073.01	1,363	32
Total		14,754	11,669

*NavigateLA with Census 2010 layer: <http://navigate.lacity.org/index01.cfm>
Census 2010 for Los Angeles County:
<http://www.census.gov/2010census/popmap/ipmtext.php?fl=06>
Table: CAJA Environmental Services, December 2013.*

**Table 3.14-6
Population and Housing in the City Los Angeles**

	2010	2013	Change 2010-2013
Population	3,792,621	3,863,839	+71,218 (+1.9%)
Housing Units	1,412,006	1,425,372	+13,366 (+0.9%)
2010: Census data, reported 4/1/2010 2013: Estimate 1/1/2013 State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2013. Sacramento, California, May 2013: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php Table: CAJA Environmental Services, December 2013.			

On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.¹³¹ The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period is called the Regional Housing Needs Assessment (RHNA) allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.¹³² The Housing Element has identified 443 sites (123.3 acres) in the Central City Community Plan Area as having the housing capacity for 17,893 net units.¹³³ The Project would add 450 residential units and not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.¹³⁴

Infrastructure Impacts

The Project Site is currently developed with a building and is located within an urbanized area in the City. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. As development of the Project would not induce substantial population growth and would be supported by the existing infrastructure such as roadways, impacts will be less than significant.

¹³¹ City of Los Angeles, Housing Element, 2013-2021: <https://sites.google.com/site/lahousingelement/>

¹³² City of Los Angeles, Housing Element, 2013-2021: <https://sites.google.com/site/lahousingelement/>

¹³³ City of Los Angeles, Housing Element, 2013-2021, draft September 17, 2013, Table 3.1, page 3-4.

¹³⁴ City of Los Angeles, Housing Element, 2013-2021, draft September 17, 2013, page 3-3.

- b) **Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project would not result in the displacement of any existing housing units, as there are no housing units on the Site. As the Project would add new housing units to the Project Site, and would not displace substantial numbers of existing housing, no impact will occur.

- c) **Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. As there are no housing units on the Site, the Project will not result in the displacement of any people. Therefore, no impact will occur.

14. PUBLIC SERVICES

This section is based on the following letters:

Response from Captain Luke Milick, Los Angeles Fire Department, June 28, 2013.

Response from Commander Andrew J. Smith, Los Angeles Police Department, July 26, 2013.

Response from Rena Perez, Director of Master Planning & Demographics, Los Angeles Unified School District, June 20, 2013.

Response from Michael A. Shull, Assistant General Manager, Los Angeles Department of Recreation and Parks, June 18, 2013.

Response from Giovanna Mannino, Director of Central Library Services, Los Angeles Public Library, August 1, 2013.

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:**

- i) **Fire protection?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed.

Pursuant to LAMC Section 57.09.07, the maximum response distance between high-density residential/commercial neighborhood land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.¹³⁵

The Project Site is served by several fire stations, as shown in Table 4.14-1, Fire Stations.

The fire stations are shown in Figure 4.14-1, Fire Station Locations.

¹³⁵ LAFD website: http://lafd.org/prevention/hydrants/division_9_fc.html

**Table 4.14-1
Fire Stations**

No.	Address	Distance	Serving Area
9	430 E 7 th St.	4,035 feet	Central City
4	450 E Temple St.	1.138 miles	Little Tokyo / Olvera Street / Chinatown
3	108 N Fremont Ave.	4,700 feet	Civic Center / Bunker Hill
10	1335 S Olive St.	1.376 miles	Convention Center District

Distance is based on driving distance.
<http://lafd.org/find-a-fire-station/275-fire-station-locator>
<http://lafd.org/find-a-fire-station/399-station-list>
 Table: CAJA Environmental Services, June 2013.

Since the Project Site is located within the distance identified by LAMC Section 57.09.07, the Project need not be constructed with automatic fire sprinkler systems and any additional fire protection as required by the LAFD Chief, unless other building and safety codes supersedes this.

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site (i.e. Broadway, 4th Street). All circulation improvement proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD’s safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing.¹³⁶

The Project will require 6,000 to 9,000 gpm flowing from four fire hydrants simultaneously. The Project Site is surrounded by double four inch hydrant and at least 12 inch mains.¹³⁷

The following four fire hydrants are the nearest to the Site:¹³⁸

¹³⁶ LAMC Sec. 57.09.06, Fire Flow: http://lafd.org/prevention/hydrants/division_9_fc.html, June 11, 2013.

¹³⁷ Written response from Captain Luke Milick, Los Angeles Fire Department, June 28, 2013.

- Hydrant (ID 9561 size 4D, 16-inch main) on southwest corner of Broadway and 4th Street.
- Hydrant (ID 9562 size 4D, 16-inch main) on northwest corner of Broadway and 4th Street.
- Hydrant (ID 9563 size 4D, 16-inch main) on northeast side of Broadway and 4th Street.
- Hydrant (ID 9560 size 4D, 16-inch main) on the east side at 428 Broadway.

As required prior to approval, the Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then upgrades to the existing infrastructure would be necessary.

To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, **Mitigation Measure 14-1** will be incorporated to reduce potential impacts on fire protection services to less than significant. These measures allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

Mitigation Measure

14-1 Public Services (Fire)

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

¹³⁸ *Navigate LA, City of Los Angeles, Bureau of Engineering, DWP (Fire Hydrants) Layer:*
<http://navigatela.lacity.org/index01.cfm>

Legend

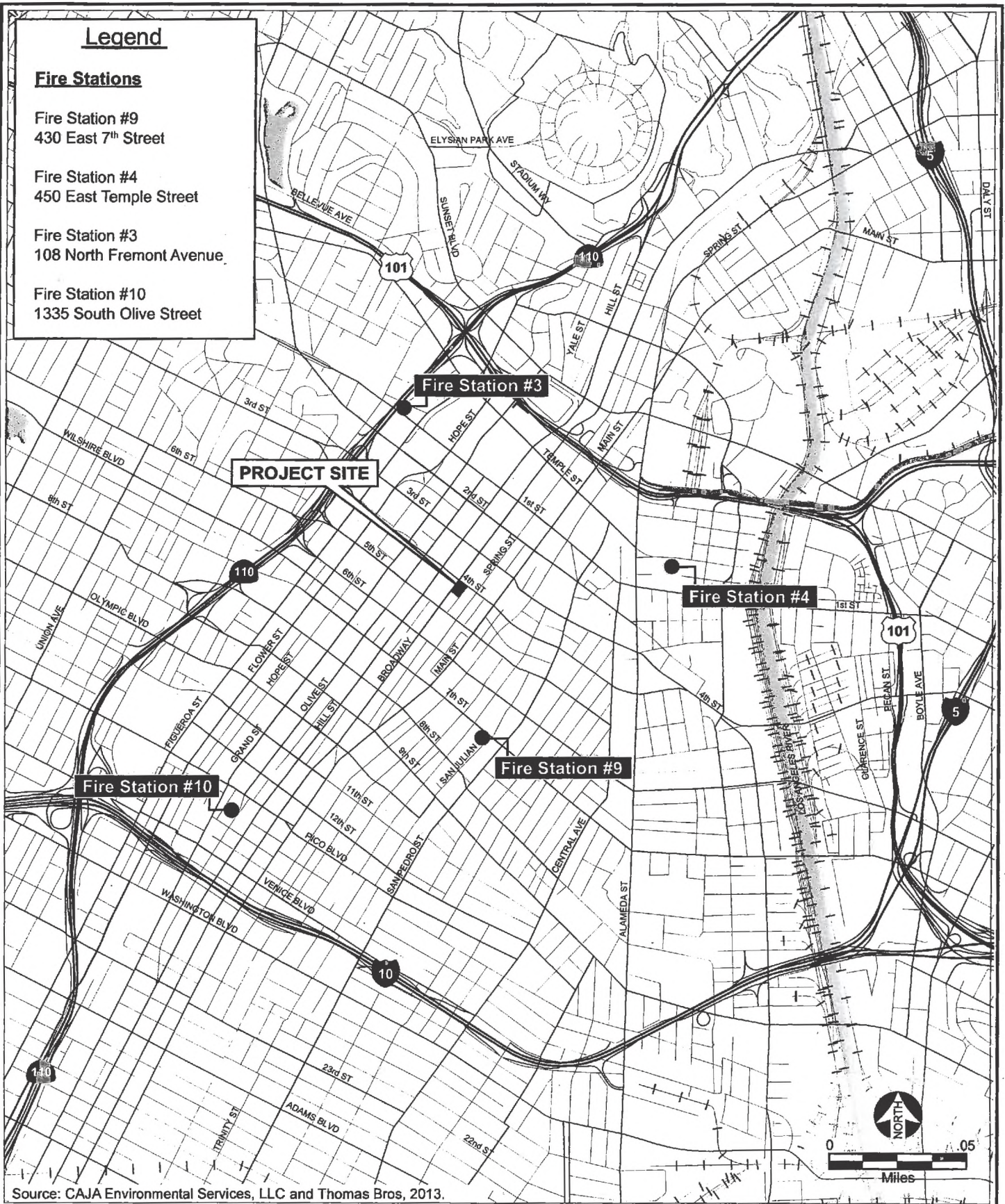
Fire Stations

Fire Station #9
430 East 7th Street

Fire Station #4
450 East Temple Street

Fire Station #3
108 North Fremont Avenue

Fire Station #10
1335 South Olive Street



Source: CAJA Environmental Services, LLC and Thomas Bros, 2013.

ii) **Police protection?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas.¹³⁹ The Central Community Police Station, located at 251 East 6th Street, approximately 0.5 mile driving distance from the Project Site.

The Central Community Police Station area encompasses approximately 4.5 square miles, including the downtown communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artists Loft, Olvera Street, Jewelry District, the Convention Center, and Fashion District).¹⁴⁰

The boundaries of Central Area are as follows: 110 Freeway to the north, Washington Boulevard and 7th Street to the south, Metrolink Railroad Tracks to the east, and 110 Freeway to the west.¹⁴¹

The average response time to emergency calls for service in the Central Area during 2012 was 4.3 minutes. This response time is below the Citywide average that was 5.7 minutes during 2012 and below the seven minute response time that is a set standard. There are approximately 450 sworn officers and 26 civilian support staff in the Central Area.¹⁴²

The police station is shown in Figure 4.14-2, Police Station Location.

Each police station area is divided into smaller Reporting Districts (RD). The Project Site is within RD 0143, which has an area as follows: 4th Street to the north, 5th Street to the south, Spring Street to the east, and Hill Street to the west.¹⁴³

Crime statistics are shown in Table 4.14-2, Reported Crimes in RD 143, Central Area, and Citywide.

¹³⁹ LAPD, Central Bureau: http://www.lapdonline.org/central_bureau

¹⁴⁰ LAPD, Central Area: http://www.lapdonline.org/central_community_police_station/content_basic_view/1681.

¹⁴¹ Written response from Commander Andrew J. Smith, LAPD, July 26, 2013. Included in the Appendices.

¹⁴² Written response from Commander Andrew J. Smith, LAPD, July 26, 2013. Included in the Appendices.

¹⁴³ Written response from Commander Andrew J. Smith, LAPD, July 26, 2013. Included in the Appendices.

According to the LAPD, there were 128 crimes per 1,000 person in the Central Area¹⁴⁴ and 51 crimes per 1,000 persons Citywide.¹⁴⁵ This result can be assumed a function of the high density area of Downtown, such as the Historic Core, Arts District, Chinatown, South Park, and Skid Row.

**Table 4.14-2
Reported Crimes in RD 143, Central Area, and Citywide**

Type of Crime	RD 143	Central Area	Citywide
Murder	0	3	298
Rape	0	33	778
Robbery	10	523	8,949
Aggravated Assault	4	419	8,281
Burglary	3	226	16,224
Burglary/Theft from Vehicle	9	882	26,327
Theft from Person	2	189	1,519
Other Theft	14	1,625	27,435
Vehicle Theft	4	335	15,356
Other Assault	23	1,663	32,114
Forgery / Counterfeit	23	82	2,481
Fraud	0	301	12,761
Embezzlement	2	28	651
Vandalism	0	628	18,704
Weapon	9	72	1,259
Pimp / Pan	3	1	86
Other Sex Offense	0	148	3,306
Against Family / Child	2	13	802
Disorderly Conduct	0	32	389
Vagrancy	0	87	1,601
All Other Violations	1	586	12,191
Total	86	7,876	191,512

The above numbers are from the 2012 crime statistics.

Source: Written response from Commander Andrew J. Smith, LAPD, July 26, 2013.

Included in the Appendices.

Table: CAJA Environmental Services, August 2013.

¹⁴⁴ $7,876 \text{ crimes} / 61,628 \text{ persons} \times 1000 = 128$

¹⁴⁵ $191,512 \text{ crimes} / 3,790,185 \text{ persons} \times 1,000 = 51$

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious.

The Project Site is generally shielded from access on the south by a 10-story residential apartment building (The Judson). The remaining sides (north, east, and west) will need to be secured during construction.

The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Mitigation Measure 14-2**). This measure would reduce potential construction impacts on police protection services to less than significant.

Operational Impacts

Development of the Project will include construction of a new residential building containing ground floor retail uses. As such, the Project could potentially increase the number of police service calls due to an increase in onsite residents, employees and customers. The potential for crime can be reduced with site specific designs and features (see **Mitigation Measure 14-3**).

The Project will include standard security measures such as adequate security lighting and secure parking facilities.

In addition, the LAPD has requested that the commanding officer of the Central Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

Although the Project will not require the construction of a new or expanded police station and the impacts with regard to this issue area will be less than significant, **Mitigation Measures 14-2** and **14-3** will further reduce the impacts associated with police services.

Mitigation Measures

14-2 Public Services (Police – Demolition/Construction Sites)

Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

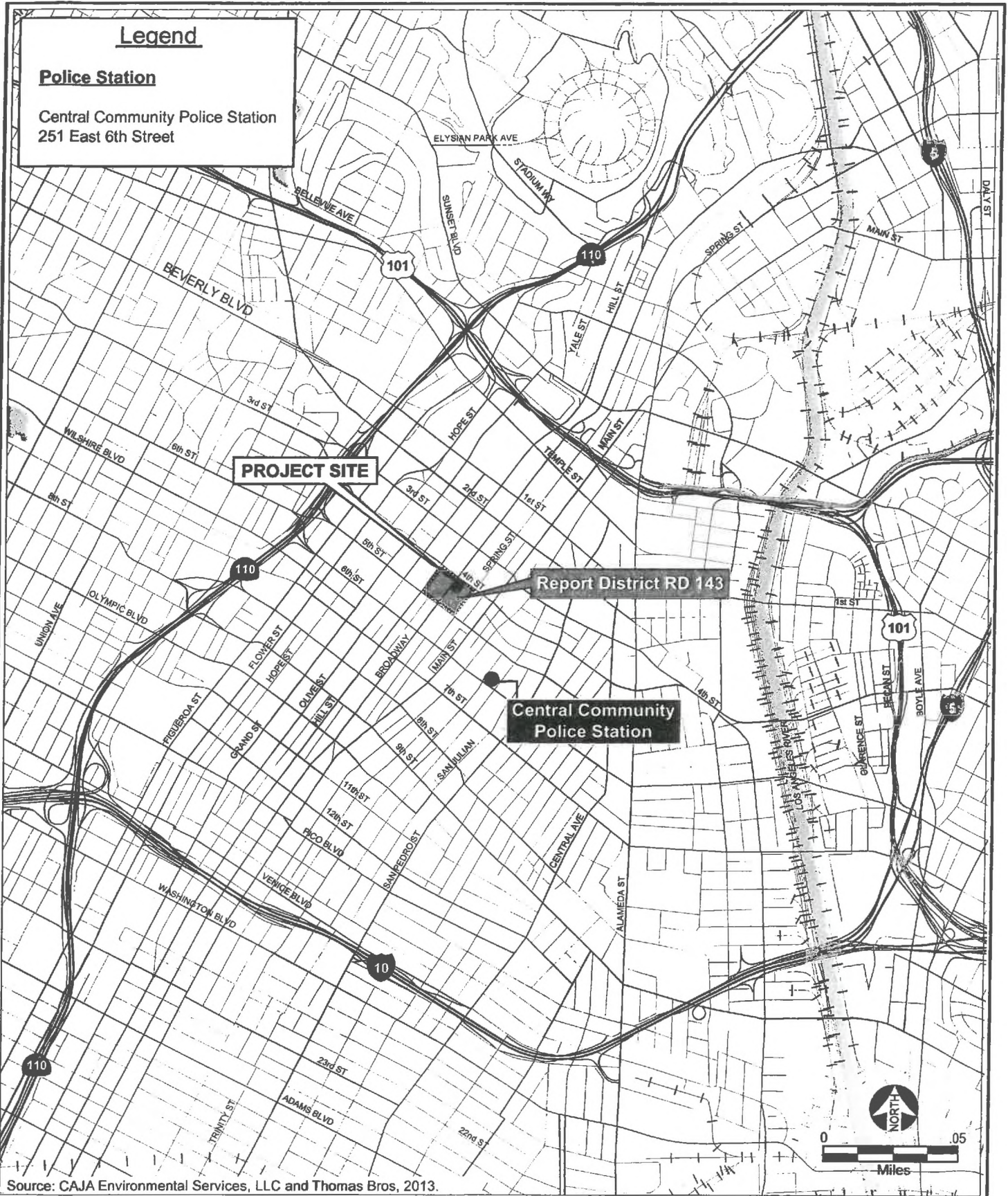
14-3 Public Services (Police)

The plans shall incorporate a design that enhances the 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.

Legend

Police Station

Central Community Police Station
251 East 6th Street



Source: CAJA Environmental Services, LLC and Thomas Bros, 2013.

iii) Schools?

Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities.

The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:

Elementary (K-5)¹⁴⁶

- 9th Street Elementary, 835 Stanford Avenue
- Plascencia Elementary, 1321 Cortez Street

Middle School (6-8)

- Liechty Middle, 650 S. Union Avenue

High School (9-12)¹⁴⁷

- Academic Leadership Community, 322 S. Lucas Avenue
- Los Angeles Teacher Preparatory Academy, 1575 W. 2nd Street
- Civitas School of Leadership, 1200 W. Colton Street
- Cortines School of Visual and Performing Arts, 450 N. Grand Avenue
- Contreres Learning Center, 322 S. Lucas Avenue
- Belmont Senior High, 1575 W. 2nd Street
- Roybal Learning Center, 1200 W. Colton Street
- Los Angeles School of Global Studies, 322 S. Lucas Avenue

¹⁴⁶ According to the LAUSD, Plascencia Elementary is receiving students from the 9th Street Elementary attendance area during reconstruction. 9th Street is scheduled to reopen in Fall 2013 and enrollment data will be available in February 2014. The Project falls into the 9th Street Elementary attendance area.

¹⁴⁷ Project is within a School Choice Area and in the Belmont Academic Zone. Schools & programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries. The individual school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating overage/shortage and overcrowding. If any of the school choice area schools is multi-track, then the service area is considered overcrowded

The schools are shown in Figure 4.14-3, School Locations.. There are anticipated new schools planned for the area.

As shown on Table 4.14-4, the Project would generate an increase of approximately 180 elementary, 45 middle, and 90 high school students, for a total increase of approximately 315 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD.

**Table 4.14-4
Project Estimated Student Generation**

Land Use	Quantity	Elementary ¹	Middle ²	High ³	Total
Residential	450 DU	180	45	90	315
¹ Elementary: 0.4 students per household ² Middle: 0.1 students per household ³ High: 0.2 students per household Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table: CAJA Environmental Services, June 2013.					

Proximity to Schools

The Project Site is not in close proximity to any public schools.¹⁴⁸ 9th Street Elementary is approximately 4,200 feet south and the Cortines School of Visual and Performing Arts is approximately 4,000 feet northeast across the 101 Freeway.

There are private schools, professional schools, and religious affiliated schools in the area. None are located within the nearest blocks around the Project Site. The nearest private schools include:

- Colburn School, 200 S. Grand Avenue, approximately 1,650 feet north
- Chicago School of Professional Psychology, 617 W. 7th Street, approximately 2,300 feet west
- Fashion Institute of Design, 919 S. Grand Avenue, approximately 3,350 feet west

Construction activities do not have the potential to impact the normal operation of the school, including bus routes and pedestrian walkways.

School Fees

¹⁴⁸ LAUSD School Finder: <http://rsi.lausd.net/ResidentSchoolIdentifier/>

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA, therefore impacts would be less than significant.

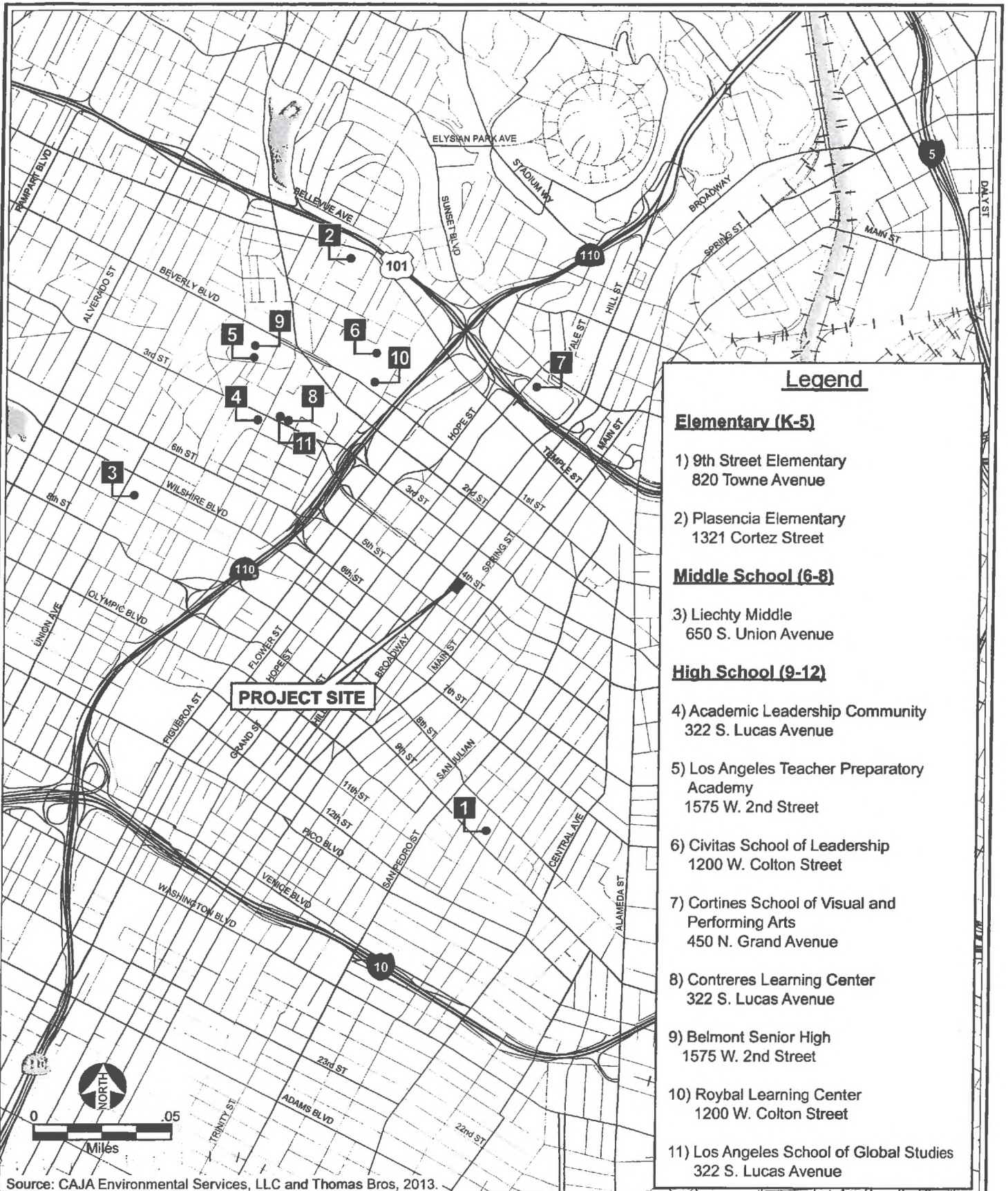


Figure 4.14-3, School Locations

iv) Parks?

Less than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. A one-mile radius is the standard service radius for neighborhood parks; and a two-mile radius is the standard for community and regional parks.¹⁴⁹

Table 4.14-5, Parks, Recreation Centers, and Open Space, lists the LADRP parks, recreation centers, and public open spaces that are located nearby the Project Site.

The parks are shown in Figure 4.14-4, Park and Open Space Locations.

The LADRP is currently investigating the opportunity to develop a park at the corner of 1st Street and Broadway, though there is currently no schedule for completion.¹⁵⁰

**Table 4.14-5
Parks, Recreation Centers, and Open Space**

Name	Address	Acres	Features
Neighborhood Parks (less than 10 acres and within one mile radius of the Project Site)			
6 th and Gladys Park	824 E. 6 th Street	0.34	Playground
City Hall Park	200 N. Spring Street	1.71	Grass open space
Contreres Learning Center	322 S. Lucas Avenue	0.55	Pool
Pershing Square	525 S. Olive Street	4.44	Ice skating rink (seasonal), stage, sunken amphitheatre
Spring Street Park	428 S. Spring Street	0.80	Grass open space
Angels Knoll	4 th Street and Hill Street	1.5	Open space, Angels Flight
Maguire Garden	Flower Street and 5 th Street	1.61	Open space, fountains, LA Central Library
Grand Hope Park	Hope Street and 9 th Street	2.1	Open space, FIDM
Pecan Recreation Center	127 S. Pecan Street	3.80	Basketball courts (lighted/indoor/outdoor), childrens play area, community room, handball courts (lighted), indoor gym (without weights), picnic tables, restroom(s), seasonal pool (outdoor/unheated), volleyball courts (lighted)
Aliso Pico Recreation Center	370 S. Clarence Street	1.74	Auditorium, baseball diamond (lighted), basketball courts (lighted/indoor/outdoor), childrens play area, community room, indoor gym (without weights),

¹⁴⁹ Written correspondence with Michael Shull, Assistant General Manager, LADRP, June 18, 2013.

¹⁵⁰ Written correspondence with Michael Shull, Assistant General Manager, LADRP, June 18, 2013.

			tennis courts (lighted), volleyball courts (lighted)
Community Parks (greater than 10 acres and within two mile radius of the Project Site)			
Grand Park ¹	Between Music Center and City Hall	12	Open space, art and music events, interactive water splash pad
Echo Park	751 Echo Park Boulevard	28.41	Barbecue pits, baseball diamond (lighted), basketball courts (lighted/indoor/outdoor), childrens play area, community room, indoor gym (without weights), picnic tables, seasonal pool (outdoor/unheated), soccer field (lighted), tennis courts (lighted), year round pool (indoor/heated/unheated)
Hollenbeck Park	415 S. St. Louis Street	18.30	Auditorium, barbecue pits, childrens play area, community room, picnic tables, outdoor exercise equipment around lake
MacArthur Park	2230 W. 6th Street	29.87	Auditorium, childrens play area, picnic tables, lake
Regional Park (greater than 50 acres and within two mile radius of the Project Site)			
Elysian Park	929 Academy Road	544.71	Chavez Ridge Disc Golf Course, chavez ravine arboretum, hiking trails, horseshoe pits, jogging paths
¹ Grand Park is operated by the Los Angeles Grand Avenue Authority, a County and City joint venture. LADRP Facility Finder: http://www.laparks.org/dos/reccenter/reccenter.htm and http://www.laparks.org/dos/parks/parks.htm Written correspondence with Michael Shull, Assistant General Manager, LADRP, June 18, 2013. Included in the Appendices. Table: CAJA Environmental Services, June 2013.			

The Public Recreation Plan, a portion of the Service Element of the City’s General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0. The Central City Community Plan has a parkland acres-to-population ratio of neighborhood and community parks of 0.10.¹⁵¹

The Project would generate approximately 693 residents and a deficit of 19 employees, after removal of the existing retail uses. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use parks or recreation centers near their homes during non-work hours.

The Project will include an Amenities Deck (Floor 11) containing a swimming pool, sauna/steam room and fitness room

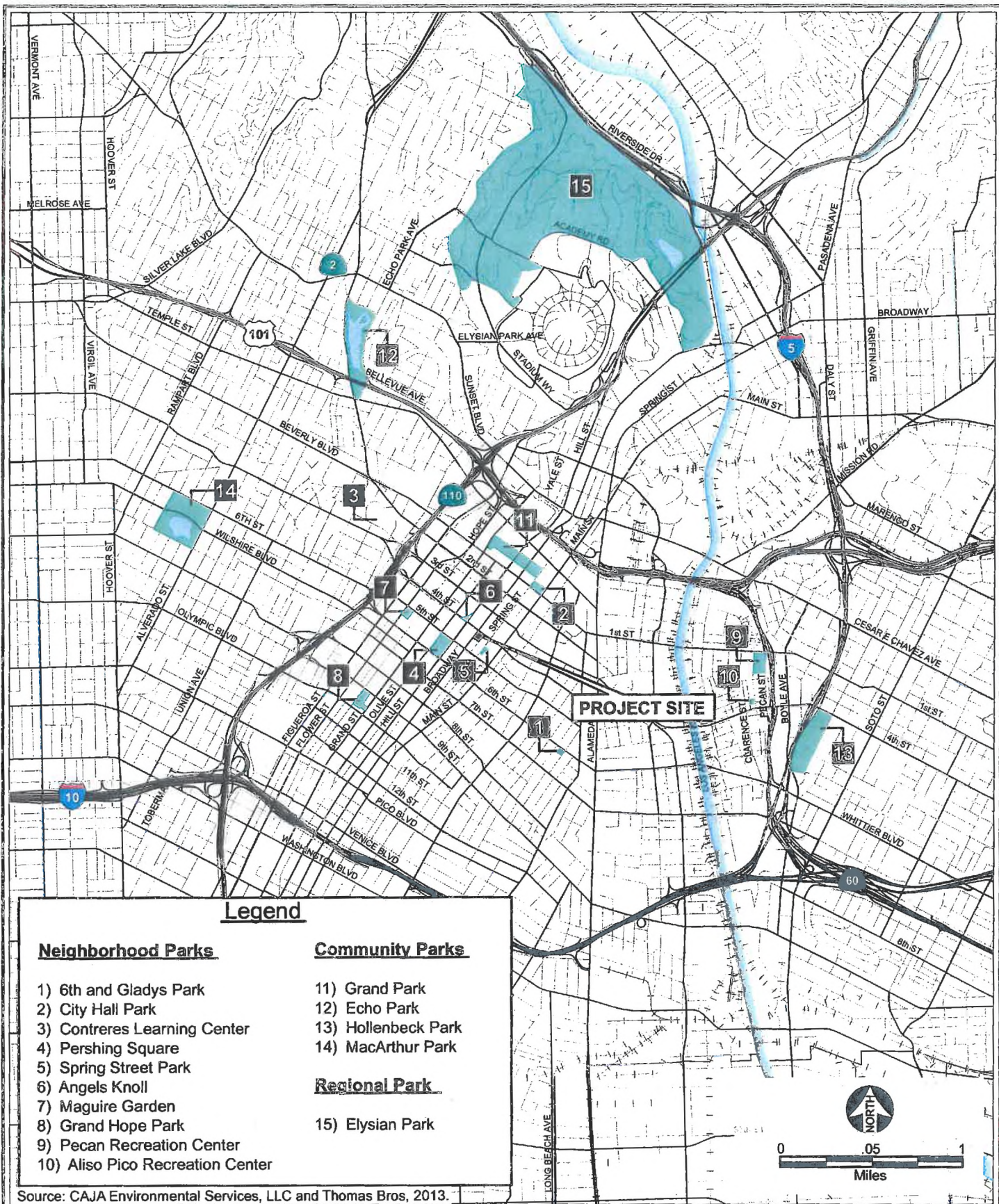
The Project’s open space requirement and amount provided are shown in Table 4.14-6, Project Open Space. The Project would be deficient of the open space requirement by 2,088 square feet. The Project is seeking a Discretionary Action for a Director’s Decision (per LAMC Section 12.22 G.3) to deviate from the code Open Space requirements by 2,088 sf, from 48,975 square feet (as required by the code) to 46,887 square feet.

¹⁵¹ Written correspondence with Michael Shull, Assistant General Manager, LADRP, June 18, 2013.

**Table 4.14-6
Project Open Space**

Unit Type	Amount	Requirement	Total (sf)
Open Space Required			
Studio and 1-bedroom	293 units	100 sf / unit	29,300
1-bedroom + Den and 2-bedroom	156 units	125 sf/ unit	19,500
Penthouse	1 unit	175 sf / unit	175
Total Required			48,975
Open Space Provided			
Total Terrace Area			21,630
Total Communal Area			7,907
Total Balcony Area			17,350
Total Provided			46,887
<i>Source: HansonLA, Architects, Entitlement Submittal, January 10, 2014. Table: CAJA Environmental Services, January 2014.</i>			

While the proposed onsite open space does not meet the required amount, the developer is required per Section 17.12 A or 17.58 of the Los Angeles Municipal Code to pay Quimby fees to the City to satisfy its obligations to maintain a ratio of 4 acres per 1,000 residents. Therefore, impacts to parks and recreation centers will be less than significant.



v) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the Project Site.

The City of Los Angeles Public Library (LAPL) provides library services throughout the City.

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population and 14,500 square feet for community with more than 45,000 population and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

Table 4.14-7 describes the two libraries that would serve the Project.

There are no planned improvements to add capacity through expansion to either library. There are no plans for the development of any other new library to serve this community.¹⁵²

The libraries are shown in Figure 4.14-5, Library Locations. Both locations are approximately 0.5 mile from the Project Site.

**Table 4.14-7
Los Angeles Public Libraries**

Name	Address	Size (sf)	Volumes / Circulation	Current / Future Service	Staff
Los Angeles Central Library	630 W. 5 th St.	538,000	2.7 million / 942,297	3,792,621 / 4,298,891	174
Little Tokyo Branch	203 S. Los Angeles St.	12,500	67,107 / 172,580	43,912 / No Forecast	8.25
<p><i>Current – 2010 Census; Future – 2020 SCAG projections</i> <i>Staffing is full-time equivalent.</i> <i>Source: Response from Giovanna Mannino, Director of Central Library Services, LAPL, August 1, 2013. Included in the Appendices.</i> <i>Table: CAJA Environmental Services, August 2013</i></p>					

¹⁵² Response from Giovanna Mannino, Director of Central Library Services, LAPL, August 1, 2013. Included in the Appendices.

The Project would generate approximately 693 residents and a deficit of 19 employees, after removal of the existing retail uses. However, employees of commercial development do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours.

The additional 693 residents represent a negligible (1.6%)¹⁵³ amount of the current service population of the Little Tokyo Branch and would be accommodated in the future service population of the Central Library, which serves the entire City.

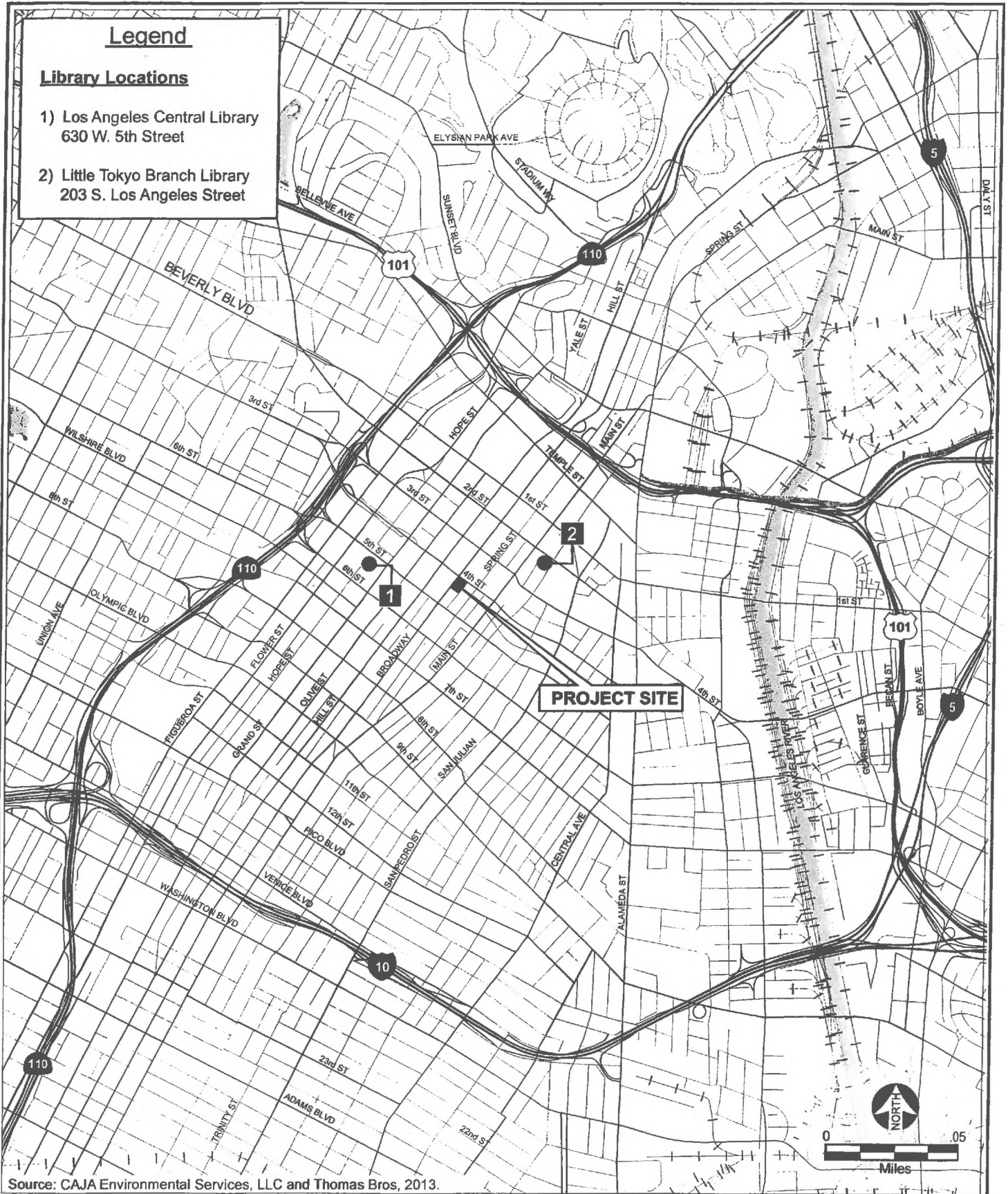
Therefore, impacts to library service will be less than significant.

¹⁵³ $693 / 43,912 \times 100\% = 1.58\%$

Legend

Library Locations

- 1) Los Angeles Central Library
630 W. 5th Street
- 2) Little Tokyo Branch Library
203 S. Los Angeles Street



15. RECREATION

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would generate approximately 693 residents and a deficit of 19 employees, after removal of the existing retail uses. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use parks or recreation centers near their homes during non-work hours.

The Project will include an Amenities Deck (Floor 11) containing a swimming pool, sauna/steam room and fitness room

The Project's open space requirement and amount provided are shown in Table 4.15-6, Project Open Space. The Project would be deficient of the open space requirement by 2,088 square feet. The Project is seeking a Discretionary Action for a Director's Decision (per LAMC Section 12.21 G.(3) to deviate from the code Open Space requirements by 2,088, from 48,975 square feet (as required by the code) to 46,887 square feet, as provided for the Project.

While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of required Quimby fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

The Project does not include construction or expansion of recreational facilities.

While the increased residents may require the construction or expansion of recreation facilities, the payment of required Quimby fees would be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

16. TRANSPORTATION AND TRAFFIC

This section is based on the following report:

Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.

Traffic Analysis for the Proposed Mixed-Use Project Located at 400 South Broadway, Los Angeles Department of Transportation, September 25, 2013.

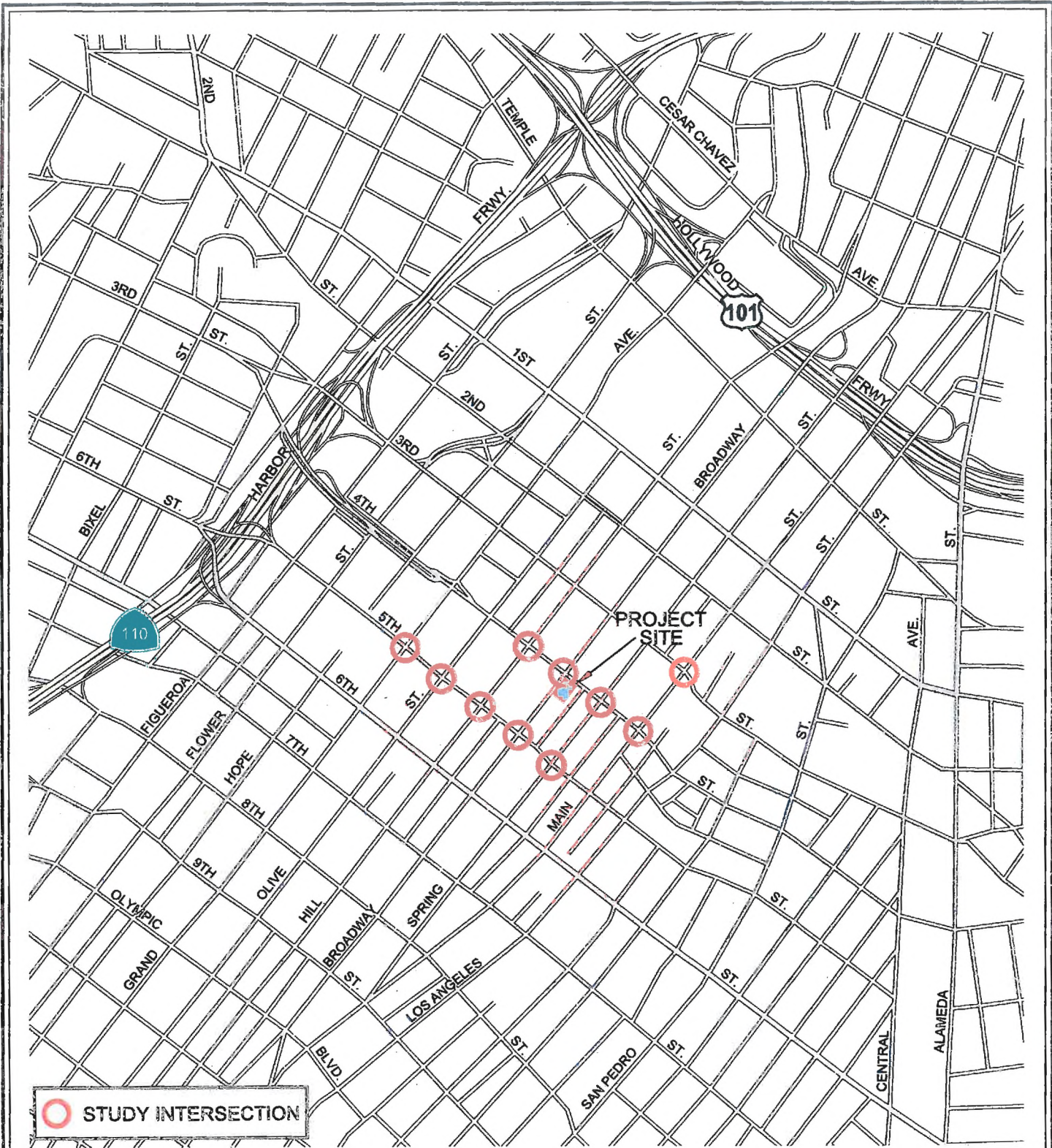
- a) **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant Impact. This analysis was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) *Traffic Study Policies and Procedures* (June 2013). The analysis is also consistent with the guidelines in the Los Angeles County Congestion Management Program (CMP).

This presents the results of a detailed analysis of existing (2013) and future (2017) traffic conditions during both the AM and PM peak hours at the following 10 study intersections, which are depicted on Figure 4.16-1, Project Site Vicinity and Study Intersection Location Map.

Study Intersections

- | | |
|-------------------------------|--------------------------------|
| 1. 3rd Street & Main Street | 6. 5th Street & Grand Avenue |
| 2. 4th Street & Hill Street | 7. 5th Street & Olive Street |
| 3. 4th Street & Broadway | 8. 5th Street & Hill Street |
| 4. 4th Street & Spring Street | 9. 5th Street & Broadway |
| 5. 4th Street & Main Street | 10. 5th Street & Spring Street |



Source: Figure 1, Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.


Not to Scale

The following traffic conditions have been analyzed:

1. Existing (2013) traffic volumes,
2. Existing (2013) Plus Project traffic volumes,
3. Future (2017) Without Project traffic volumes, and
4. Future (2017) With Project traffic volumes.

The future analyses included cumulative traffic attributable to ambient growth and related projects within the Project study area.

Environmental Setting

The Project Site and surrounding uses in the Central City Community Plan Area are well-served by Major and Secondary Highways. The Major Highways are primarily located outside the Project study area and include Figueroa Street, Grand Avenue, Spring Street (north of 2nd Street), Main Street (south of 9th Street), San Pedro Street, Central Avenue, Alameda Street, 1st Street, Wilshire Boulevard (west of Flower Street), and Olympic Boulevard.

The Project study area is composed mainly of Secondary Highways, including Olive Street, Hill Street, Broadway, Spring Street (south of 2nd Street), Main Street (north of 9th Street), 3rd Street, 4th Street, and 5th Street. In addition to the local surface street system, the Santa Monica Freeway is located approximately 1.5 miles south of the Project Site, the Harbor Freeway is located approximately 0.75 miles west of the Project Site, the Hollywood Freeway is located approximately 0.75 miles north of the Project Site, and the Santa Ana Freeway (US-101) is located approximately 1.5 miles east of the Project Site. This “freeway ring” around Downtown Los Angeles provides convenient access to the larger, regional roadway network.

Existing Highways and Streets

Grand Avenue is a north-south Major Highway Class II within the Central City Community Plan Area. This roadway extends discontinuously from its southerly terminus near Imperial Highway in South Los Angeles to its northerly terminus at Alpine Street in the Chinatown community. In the Project study area, this roadway operates as a two-way roadway, north of 5th Street, and as a one-way southbound roadway, south of 5th Street. North of 5th Street, the roadway generally provides two travel lanes per direction. South of 5th Street, the roadway generally provides three southbound through travel lanes. On the Grand Avenue southbound approach to 5th Street, parking is not allowed on either side of the roadway.

Olive Street is a north-south Secondary Highway within the Central City Community Plan Area. This roadway extends discontinuously from its southerly terminus near Imperial Highway in South Los Angeles to its northerly terminus at 1st Street in Downtown Los Angeles. In the Project study area, this

roadway operates as a two-way roadway, north of 5th Street, and as a one-way northbound roadway, south of 5th Street. North of 5th Street, the roadway provides three northbound through travel lanes and one southbound through travel lane. South of 5th Street, the roadway provides three through travel lanes, with left-turn channelization provided at major intersections. A northbound bicycle lane was installed on Main Street in 2011. On the Olive Street approaches to 5th Street, parking is not allowed on either side of the roadway.

Hill Street is a north-south Secondary Highway within the Central City Community Plan Area. The roadway runs from Martin Luther King Boulevard, near Exposition Park, to the Chinatown community, where it terminates at the Pasadena Freeway (SR-110). In the Project study area, this roadway generally provides two through travel lanes per direction, with left- and/or right-turn channelization at major intersections. Signalized pedestrian midblock crosswalks are provided on Hill Street between 3rd Street and 4th Street, between 4th Street and 5th Street, and between 5th Street and 6th Street. Metered parking is provided along the east side of Hill Street, between 4th Street and 5th Street; however, parking is prohibited during the weekday PM peak period.

Broadway is a north-south Secondary Highway within the Central City Community Plan Area. The roadway runs from Main Street in the City of Carson to Mission Road in the Lincoln Heights community. The Project Site is bounded by Broadway to the west. In the Project study area, this roadway generally provides two to three through travel lanes per direction. Signalized pedestrian midblock crosswalks are provided on Broadway between 3rd Street and 4th Street, between 4th Street and 5th Street, and between 5th Street and 6th Street. Although loading zone parking is allowed on both sides of Broadway between 9:00 AM and 3:00 PM, all parking is prohibited during the weekday AM and PM peak periods.

Spring Street is a north-south Secondary Highway, south of 2nd Street, within the Central City Community Plan Area. This roadway extends discontinuously from its southerly terminus at 9th Street, where the one-way couplet of Spring Street and Main Street becomes a bidirectional roadway, to its northerly terminus at Avenue 18 in the Lincoln Heights community, where the roadway becomes Broadway. In the Project study area, this roadway operates one-way southbound and generally provides three through travel lanes, with right-turn channelization provided at major intersections. Following the guidance of the Los Angeles Department of City Planning *2010 Bicycle Plan* (adopted March 1, 2011), a southbound bicycle lane was installed on Spring Street in 2012. Metered parking is provided intermittently along both sides of Spring Street within the Project study area; however, parking along the east side is prohibited during the weekday AM and PM peak periods.

Main Street is a north-south Secondary Highway, north of 9th Street, within the Central City Community Plan Area. This roadway extends from its southerly terminus at Lomita Boulevard in the Wilmington community to 64th Street to the Lincoln Heights community, where the roadway transitions into Valley Boulevard. In the Project study area, this roadway operates one-way northbound and generally provides three through travel lanes, with right-turn channelization provided at major intersections. A northbound bicycle lane was installed on Main Street in 2011. Metered parking is provided along both sides of Main

Street within the Project area; however, parking is prohibited on the west side of the roadway during the weekday PM peak period.

3rd Street is an east-west Secondary Highway within the Central City Community Plan Area. This roadway extends discontinuously from its westerly terminus at Civic Center Drive in the City of Beverly Hills to its easterly terminus at Beverly Boulevard in the East Los Angeles community, where the roadway becomes Pomona Boulevard. In the Project study area, this roadway operates one-way westbound and generally provides three through travel lanes. Parking is not allowed on the 3rd Street approach to Main Street.

4th Street is an east-west Secondary Highway within the Central City Community Plan Area. This roadway extends discontinuously from its westerly terminus at La Cienega Boulevard, near the City of Beverly Hills, to its easterly terminus near Repetto Street in the East Los Angeles community. The Project Site is bounded by 4th Street to the north. In the Project study area, this roadway operates one-way eastbound and generally provides two-to-four through travel lanes. Metered parking is provided intermittently along both sides of 4th Street within the Project study area; however, parking is prohibited either during the weekday PM peak period or during both weekday AM and PM peak periods, which effectively increases the peak-period through capacity to four lanes throughout the study area.

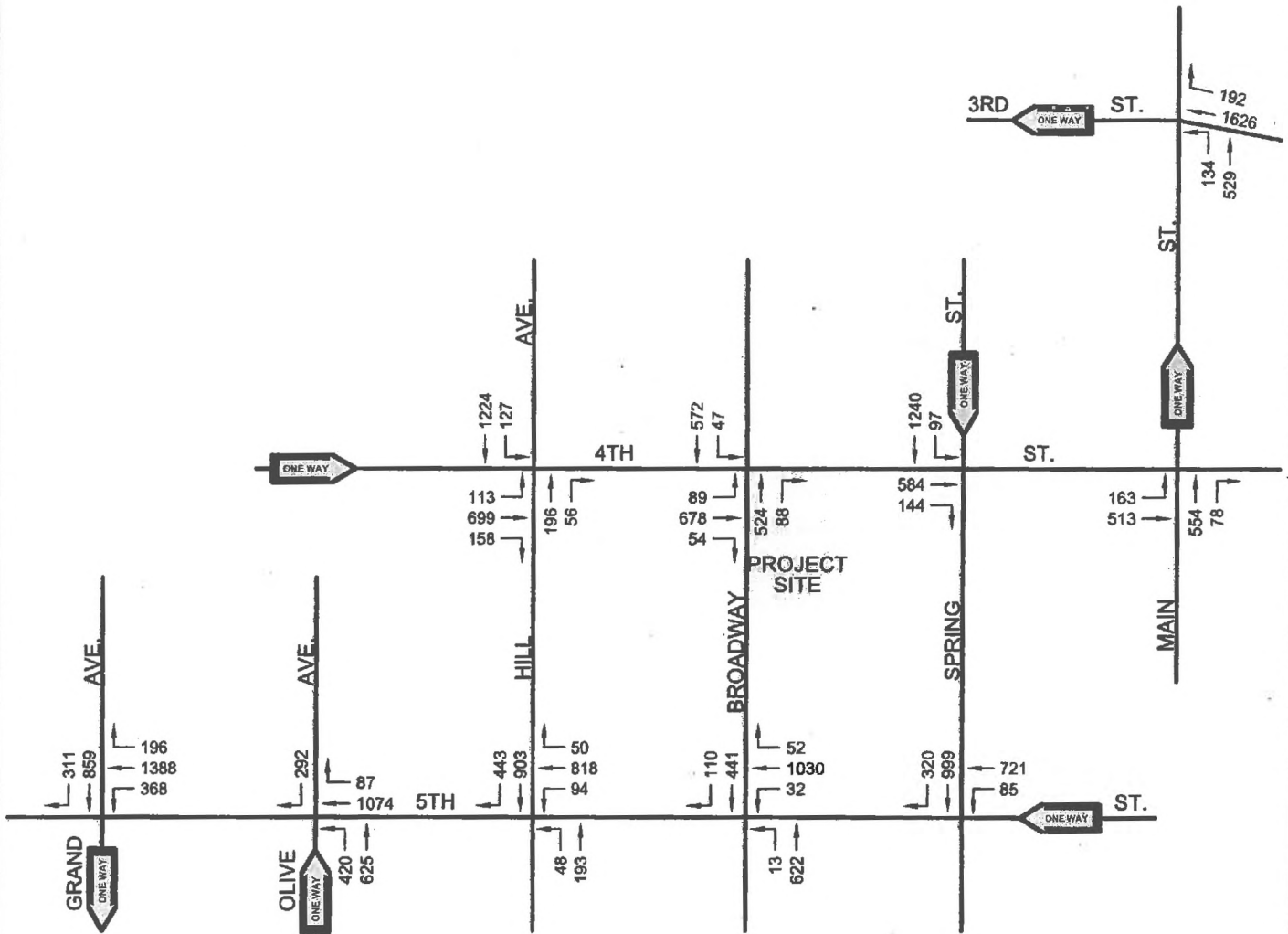
5th Street is an east-west Secondary Highway within the Central City Community Plan Area. This roadway extends discontinuously from its westerly terminus at San Vicente Boulevard, near the City of Beverly Hills, to its easterly near the Long Beach Freeway (I- 710) in the East Los Angeles community. In the Project study area, this roadway operates one-way westbound and generally provides two-to-five through travel lanes. Metered parking is provided intermittently along the both sides of 5th Street within the Project study area; however, parking is prohibited during the weekday AM and PM peak periods, which effectively increases the peak-period through capacity to four-to-five lanes throughout the study area.

Existing (2013) Traffic Volumes

Traffic volumes for existing conditions were obtained from manual traffic counts conducted on Thursday, June 6, 2013. In accordance with the current LADOT *Traffic Study Policies and Procedures* (June 2013), the intersection traffic counts for this study were completed on a typical weekday during the morning and afternoon peak commute periods, which range from 7:00 to 10:00 AM and 3:00 to 6:00 PM, respectively.

Peak-hour volumes were determined individually for each intersection based on the highest-volume during four consecutive 15-minute periods for all vehicular movements. The Existing (2013) AM and PM peak-hour volumes at the study intersections are illustrated on Figures 4.16-2 and 4.16-3, respectively. The intersection count data sheets are provided in Appendix A of the Traffic Impact Study.

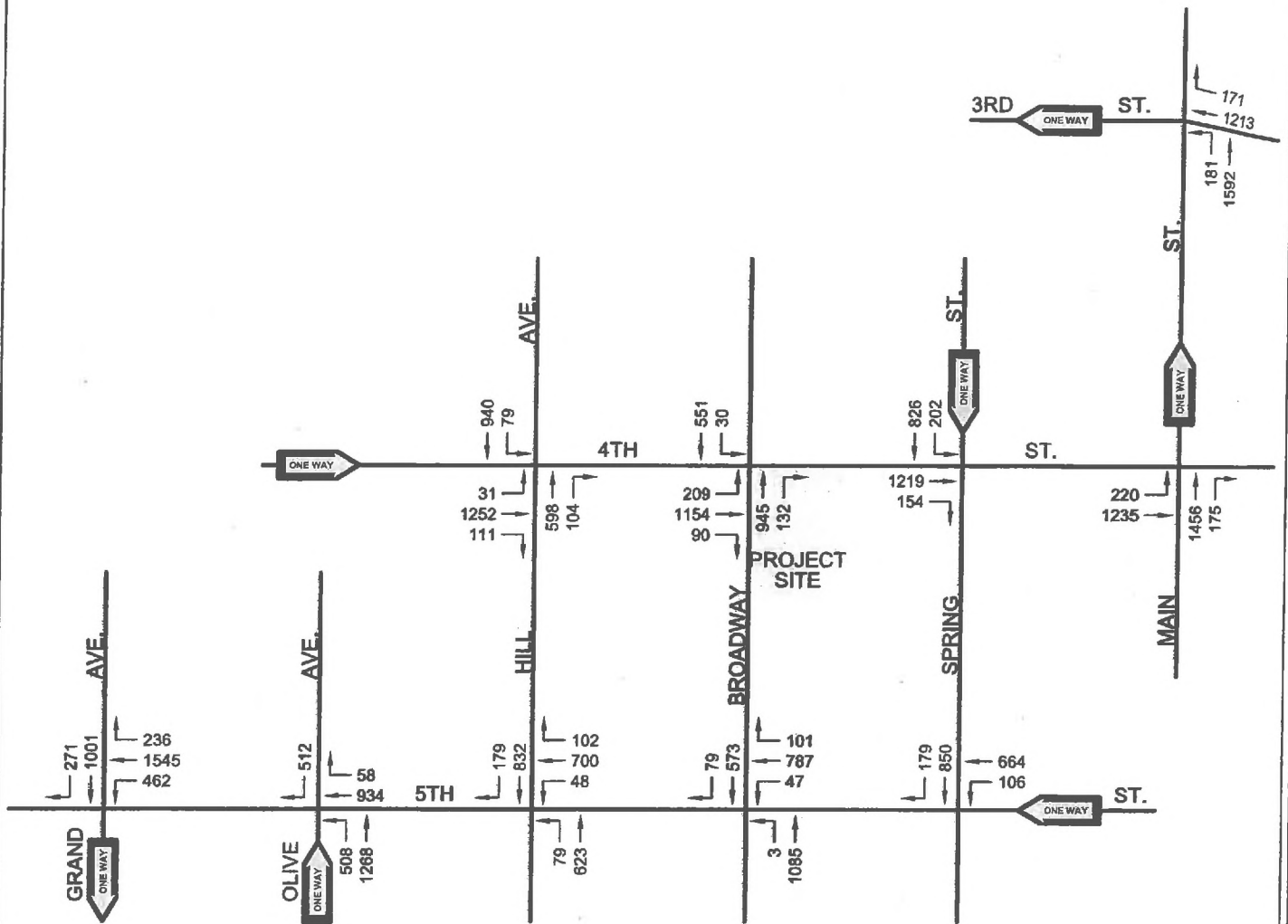
Information pertaining to intersection characteristics, such as geometrics, traffic signal operations, and on-street parking restrictions were obtained from field checks and City engineering plans.



Source: Figure 3(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale



Source: Figure 3(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale

Existing Public Transportation

The Project study area is well served by a number of public transit operators, including the Los Angeles County Metropolitan Transportation Authority (“Metro”), the LADOT and others. The Project Site’s proximity to Union Station, approximately one mile to the northeast, also links it to Amtrak, Metrolink, Metro rail services and numerous bus routes operated by Metro and LADOT. The main bus routes and rail lines within the study area are shown on Figure 4.16-4, Project Area Transit Routes, and described below. Metro operates a multitude of bus routes that serve the Project Site, providing downtown circulation and connecting it with the greater metropolitan area.

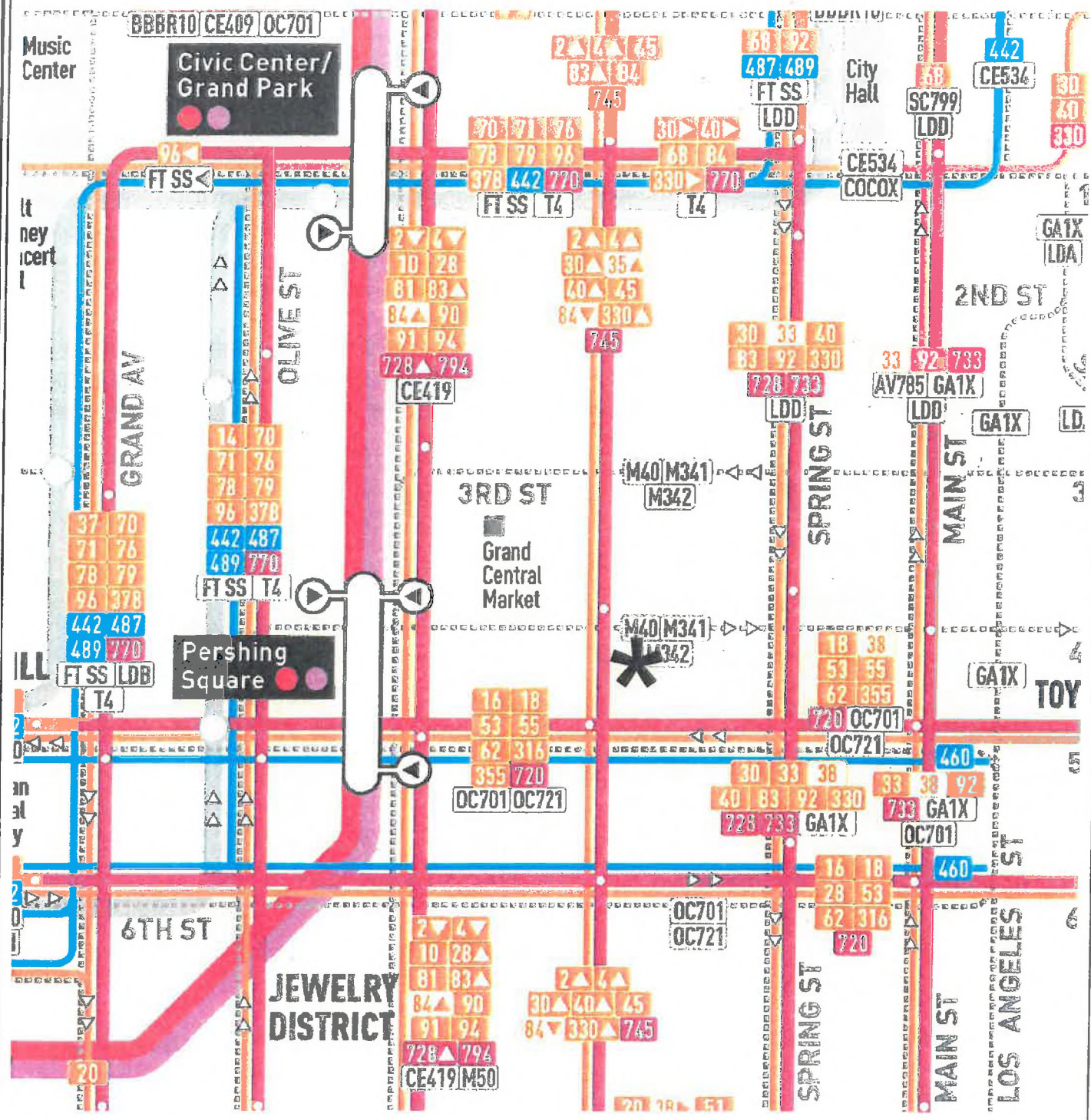
Metro operates more than 40 local, limited stop, express, and rapid routes within reasonable walking distance (one-quarter mile) of the Project Site, with frequent peak hour service. In addition, several other transit operators provide bus service in this area. Streets adjacent or proximate to the Project Site along which bus and rail lines run include Grand Avenue, Olive Street, Hill Street, Broadway, Spring Street, Main Street, 3rd Street, 4th Street, 5th Street, and 6th Street.

Operating adjacent or proximate to the site are north-south Lines 14, 37, 70, 71, 76, 78, 79, 96, 378, 442, 487, 487, 770, FT SS, DASH B, and T4 along southbound Grand Avenue and northbound Olive Street; Lines 2, 4, 10, 28, 81, 83, 84, 90, 91, 94, 728, 794, and CE419 along Hill Street; Lines 2, 4, 30, 35, 40, 45, 84, 330, and 745 along Broadway; 30, 33, 40, 83, 92, 330, 728, 733, and DASH D along Spring Street; Lines 33, 92, 733, AV 785, GA 1X, and DASH D along Main Street.

Traveling east-west past the site are Lines M40, M431, and M342 along westbound 3rd Street and eastbound 4th Street; Lines 16, 18, 53, 55, 62, 316, 355, 460, 720, OC701, and OC721 traveling along westbound 5th Street and eastbound 6th Street. Most of these routes have average headways of 5 to 20 minutes during peak hours.

The Metro rail system travels between downtown Los Angeles and various locations within the greater region. Located approximately 0.2 miles walking distance west of the Project Site is the Pershing Square Station, the nearest Metro rail station. It is served by the Purple Line and Red Line. The Purple Rail Line runs from the Koreatown neighborhood to Downtown Los Angeles. Overlapping the Purple Rail Line between Downtown Los Angeles and the Wilshire/Vermont Station, the Red Rail Line then splits off and travels through the Hollywood community and northward to the North Hollywood community. Both the Red and Purple Rail Lines travel below grade and operate with headways of approximately 5 to 10 minutes on weekdays and 5 to 15 minutes on weekends.

As is evident from the above information, the Project Site and surrounding area are well served by public transit. When transfer opportunities are considered, the site is accessible to and from the greater Los Angeles region via public transit. Thus, it is expected that some of the person trips generated by the Project would utilize public transit as the primary travel mode instead of private vehicles.



* PROJECT SITE

Source: Figure 4, Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.


Not to Scale

Analysis of Existing (2013) Traffic Conditions

The 10 study intersections listed below were analyzed for existing traffic conditions. All of these intersections are signalized. They were selected in consultation with the LADOT for the analysis of potential project traffic impacts. Per current LADOT policy, when determining which intersections should be included in the impact analysis for development projects, only signalized locations should be included. Unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control devices, but will not be included in the impact analysis.

The existing peak-hour traffic volumes for these intersections were discussed previously and presented on Figures 4.16-2 and 4.16-3. These volumes, along with information pertaining to intersection geometrics, traffic signal operations and on-street parking restrictions, were analyzed using established traffic engineering techniques.

1. 3rd Street & Main Street
2. 4th Street & Hill Street
3. 4th Street & Broadway
4. 4th Street & Spring Street
5. 4th Street & Main Street
6. 5th Street & Grand Avenue
7. 5th Street & Olive Street
8. 5th Street & Hill Street
9. 5th Street & Broadway
10. 5th Street & Spring Street

The LADOT *Traffic Study Policies and Procedures* (June 2013) require the use of the Critical Movement Analysis (CMA) methodology to analyze signalized intersections. This methodology is based on procedures outlined in the Transportation Research Board Circular 212, Interim Materials on Highway Capacity. Using the CMA procedures, a determination can be made of the operating characteristics of an intersection in terms of the Level of Service for different levels of traffic volume and other variables, such as critical signal phases and the number and type of traffic lanes.

The term “Level of Service” (LOS) describes the quality of traffic flow:

- LOS A through C are indicative of excellent-to-good traffic flow conditions.

- LOS D corresponds with fair conditions that may experience substantial delay during portions of the peak hours, but without excessive backups.
- LOS E represents poor conditions, with volumes at or near the capacity of the intersection and long lines of vehicles that may have to wait through several signal cycles.
- LOS F is characteristic of failure (i.e., the intersection is overloaded, vehicular movements may be restricted or prevented, and delays and queue lengths become increasingly longer).

A determination of the LOS at an intersection can be obtained through a summation of the critical movement volumes, on a per lane basis, at that intersection. Critical movement volumes are the highest total conflicting traffic volumes for each signal phase. Once the sum of the critical movement volumes has been obtained, the values in Table 4.16-1, Critical Movement Volume Ranges for Determining Levels of Service (LOS), can be used to determine the applicable LOS.

**Table 4.16-1
Critical Movement Volume Ranges* for Determining Levels of Service (LOS)**

Maximum Sum of Critical Volumes (Vehicles/Hour)			
LOS	Two Phases	Three Phases	Four or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	Not Applicable		

**For planning applications only.
Table 2 in Traffic Impact Study, Crain & Associates, August 5, 2013.*

Capacity is the total maximum hourly volume of vehicles in the intersection critical lanes that has a reasonable expectation of passing through the intersection under the prevailing roadway and traffic conditions. For planning purposes, the capacity for signalized intersections equates to the maximum critical movement value at LOS E, as indicated in Table 4.16-1, Critical Movement Volume Ranges for Determining Levels of Service (LOS).

The CMA values used in this study were calculated by dividing the sum of the critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the subject intersections.

A description of the different LOS and their corresponding CMA values is shown in Table 4.16-2, Level of Service (LOS) As a Function of CMA Values.

**Table 4.16-2
Level of Service (LOS) As a Function of CMA Values**

LOS	Range of CMA Values
A	0.000 – 0.600
B	0.601 – 0.700
C	0.701 - 0.800
D	0.801 – 0.900
E	0.901 – 1.000
F	≥ 1.001

Table 3 in Traffic Impact Study, Crain & Associates, August 5, 2013.

Applying this analysis procedure, the CMA value and corresponding LOS can be calculated for each study intersection for Existing (2013) traffic conditions. These standard CMA calculations are also adjusted to account for signal enhancements not considered in the CMA methodology, including the effects of intersections currently operating under the City’s Automated Traffic Surveillance and Control (ATSAC) system or the upgraded Adaptive Traffic Control System (ATCS).

ATSAC/ATCS is a highly sophisticated computerized system that continually monitors traffic demand at signalized intersections within the system and modifies signal timing in real time to maximize capacity and decrease overall delay. The ATSAC system has been recognized to increase intersection capacity by approximately seven percent. The upgrade to ATCS is able to increase capacity by an additional three percent, resulting in a total 10 percent increase in intersection capacity.

Therefore, per LADOT policy, the standard CMA values were decreased by 0.070 where only the ATSAC system is in effect and by 0.100 where the combined ATSAC/ATCS is in effect.

All 10 study intersections are currently operating with ATSAC signal enhancements only.

All 10 intersections are tentatively scheduled to be upgraded with full ATSAC/ATCS signal enhancements in mid-2016.

The analyses of Existing (2013) AM and PM peak-hour conditions at the study intersections are summarized in Table 4.16-3, Critical Movement Analysis (CMA) and Level of Service (LOS) Summary Existing (2013) Traffic Conditions.

All 10 study intersections currently operate at LOS A during both peak hours. All CMA/LOS calculations were performed using the standard LADOT LOS Worksheet.

**Table 4.16-3
Critical Movement Analysis (CMA) and Level of Service (LOS) Summary
Existing (2013) Traffic Conditions**

No.	Intersection	Peak Hour	CMA	LOS
1	3 rd Street / Main Street	AM	0.439	A
		PM	0.593	A
2	4 th Street / Hill Street	AM	0.500	A
		PM	0.476	A
3	4 th Street / Broadway	AM	0.319	A
		PM	0.507	A
4	4 th Street / Spring Street	AM	0.470	A
		PM	0.387	A
5	4 th Street / Main Street	AM	0.340	A
		PM	0.496	A
6	5 th Street / Grand Avenue	AM	0.371	A
		PM	0.420	A
7	5 th Street / Olive Street	AM	0.368	A
		PM	0.564	A
8	5 th Street / Hill Street	AM	0.408	A
		PM	0.394	A
9	5 th Street / Broadway	AM	0.272	A
		PM	0.330	A
10	5 th Street / Spring Street	AM	0.287	A
		PM	0.247	A

Table 4 in Traffic Impact Study, Crain & Associates, August 5, 2013.

Project Trip Generation

In order to develop the traffic characteristics of the Project, the latest version of the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) was used. The trip generation equations and rates in the ITE manual are nationally recognized and are used as the basis for most traffic studies conducted in the City of Los Angeles and surrounding region. Information was obtained from the Trip Generation Manual for ITE Land Use Code (LUC) 220 – Apartment and LUC 820 – Shopping Center. The 450 residential dwelling units were treated as apartments, as opposed to condominiums, given that apartments have higher trip rates during all analyzed time periods.

Table 4.16-4, Project Trip Generation Rates, presents the trip generation rates used to generate the daily and peak-hour traffic volumes for the Project.

**Table 4.16-4
Project Trip Generation Rates**

Land Use	Land Use Code	Daily	AM Peak Hour	PM Peak Hour
Apartment (Per Dwelling Unit)	ITE LUC 220	T = 6.65 (DU)	T = 0.51 (DU) IB = 20% OB = 80%	T = 0.62 (DU) IB = 65% OB = 35%
Shopping Center (Per 1,000 sf gross leasable area)	ITE LUC 820	T = 42.70 (A)	T = 0.96 (A) IB = 62% OB = 38%	T = 3.71 (A) IB = 48% OB = 52%

T = Trip Ends, DU = Dwelling Units, A = Gross Leasable Area in 1,000 sf, IB = Inbound, OB = Outbound
 Source: Institute of Transportation Engineers (ITE) *Trip Generation Manual* (9th Edition, 2012).
 Table 5 in *Traffic Impact Study*, Crain & Associates, August 5, 2013.

By applying the trip rates provided in 4.16-4, Project Trip Generation Rates, baseline daily, AM peak-hour and PM peak-hour trips were calculated for the Project uses. As these rates do not account for such trip-reducing factors as internally captured trips, significant transit usage and/or walk trip potential, or pass-by trips, the baseline trips reflect a conservative condition. These trip-reducing factors are important considerations in determining the actual traffic-generating characteristics of a project and, therefore, adjustments to the baseline trip generations were made.

Given the mix of proposed uses on the Project Site, it is expected that there would be trip interactions between individual uses that do not require the use of a vehicle. It is generally recognized that residents or patrons of a site will utilize other on-site uses if they are conveniently located or provide useful services or amenities, with the level of interaction dependent upon the number of residents or patrons, service providers, accessibility, and other factors. For this particular Project, some of the condominium/apartment residents would be expected to use the on-site retail uses.

Thus, a reduction in trips between these uses would be expected. Based on the mix of uses, an internal capture adjustment of 10 percent, based on the Project’s general retail uses, has been assumed for the proposed Project. This internal capture adjustment has been approved by LADOT staff.

The use of public transportation is an important consideration in the evaluation of a project’s trip-generating potential. As noted previously under Existing Public Transportation, the Project is extremely well served by bus and rail lines of various transit operators. These transit operators provide both local and regional routes that are readily accessible to Project residents, employees, and patrons. Significant transit use is not accounted for in the ITE Trip Generation Manual trip equations. Therefore, adjustments were made to the Project trip generation to account for transit usage. Based on the plethora of available transit options, a combined transit trip adjustment of 15 percent has been assumed for the Project. This transit adjustment has been approved by LADOT staff.

Additionally, “walk-in” trips to and from the Project Site are also expected. Given the mix of land uses existing and proposed within the Central City Community Plan Area of Downtown Los Angeles, it is expected that people working, living, and shopping in the area would consider walking between adjacent and nearby developments. Well-situated within the commercial office/retail core of Downtown Los Angeles, the Project Site is expected to be attractive and conducive to pedestrian traffic. This walk-in patronage would reduce the number of vehicle trips generated by the Project. Based on the Project location and mix of uses, a walk trip adjustment of five percent has been assumed for the Project. This walk adjustment has been approved by LADOT staff.

Trip reduction factors for the Project also account for the presence of “passby” trips. As these trips pass by the Project, the specific convenient facilities provided by the Project (or other factors) produce a stop at the Site. Such activity is considered to be an interim stop along a trip which existed irrespective of the development of the Project, and therefore vehicles making these stops are not considered to be newly generated Project-related traffic. The LADOT has developed a series of recommended pass-by trip reduction percentages for various development types and sizes. Based on these recommendations, it was assumed that the proposed Project retail uses would experience a 50 percent pass-by trip adjustment.

Based on the trip generation rates and aforementioned trip reduction factors, projections of the amount of traffic to be generated for the proposed Project were derived. Table 4.16-5, Project Trip Generation Summary, summarizes the trip generation for the Project.

As shown, once completed and occupied, the Project is anticipated to generate a total of 2,266 net trips per day, with 183 trips during the AM peak hour and 212 trips during the PM peak hour. These peak-hour trips were used to analyze Project impacts at the 10 study intersections.

Per LADOT policy and as a conservative procedure, trip reductions for retail pass-by activity should not be applied to the Project’s driveways and appropriate Site-adjacent intersections, since pass-by trips, while not new to the area roadways, would be included in the number of vehicles that enter and exit the Site’s driveways and appropriate site-adjacent intersection turning movements required for Project access.

The total Project traffic volumes at the Project driveways and appropriate Site-adjacent intersections were also calculated. However, given that all Project access would occur along the south side of 4th Street (either via 4th Street or Frank Court), between Broadway and Spring Street, pass-by trips would exit and enter the surface street traffic stream between study intersections and would not be expected to have a substantive impact on traffic volumes at any study intersection locations.

**Table 4.16-5
Project Trip Generation Summary**

Description	Size	Average Weekday	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Uses								
Residential								
Apartment	450 DU	2,993	46	184	230	181	98	279
-10% Internal Capture Adjustment		(32)	0	(1)	(1)	(2)	(1)	(3)
<i>Residential w/ Internal Capture Adjustment Subtotal</i>		2,961	46	183	229	179	97	276
-15% Transit Adjustment		(444)	(7)	(27)	(34)	(27)	(14)	(41)
<i>Residential w/ Transit Adjustment Subtotal</i>		2,517	39	156	195	152	83	235
-5% Walk Adjustment		(126)	(2)	(8)	(10)	(8)	(4)	(12)
Residential Total		2,391	37	148	185	144	79	223
Commercial								
General Retail	7.5 ksf	320	4	3	7	13	15	28
-10% Internal Capture Adjustment		(32)	(1)	0	(1)	(1)	(2)	(3)
<i>General Retail w/ Internal Capture Adjustment Subtotal</i>		288	3	3	6	12	13	25
-15% Transit Adjustment		(43)	0	(1)	(1)	(2)	(2)	(4)
<i>General Retail w/ Transit Adjustment Subtotal</i>		245	3	2	5	10	11	21
-5% Walk Adjustment		(12)	0	0	0	0	(1)	(1)
<i>General Retail w/ Walk Adjustment Subtotal</i>		233	3	2	5	10	10	20
-50% Pass-by Adjustment		(116)	(1)	(1)	(2)	(5)	(5)	(10)
General Retail Total		117	2	1	3	5	5	10
Proposed Project Driveway Trips (Including Pass-by Trips)		2,624	40	150	190	154	89	243
Proposed Project Trips		2,508	39	149	188	149	84	233
Existing Use								
General Retail	14.0 ksf	598	8	5	13	25	27	52
-15% Transit Adjustment		(90)	(1)	(1)	(2)	(4)	(4)	(8)
<i>General Retail w/ Transit Adjustment Subtotal</i>		508	7	4	11	21	23	44
-5% Walk Adjustment		(25)	(1)	0	(1)	(1)	(1)	(2)
<i>General Retail w/ Walk Adjustment Subtotal</i>		483	6	4	10	20	22	42
-50% Pass-by Adjustment		(241)	(3)	(2)	(5)	(10)	(11)	(21)
General Retail Total		242	3	2	5	10	11	21

**Table 4.16-5
Project Trip Generation Summary**

Description	Size	Average Weekday	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<i>Existing Project Driveway Trips (Including Pass-by Trips)</i>		483	6	4	10	20	22	42
Existing Project Trips		242	3	2	5	10	11	21
Net Project Driveway Trips (Including Pass-by Trips)		2,141	34	146	180	134	67	201
Net Project Trips		2,266	36	147	183	139	73	212

DU = dwelling unit, ksf = 1,000 square feet

Notes:

1) ITE Trip Generation Manual (9th Edition, 2012) trip generation rates and equations for Land Use Codes 220 (Apartment) and 820 (Shopping Center) applied.

2) Although the Project proposes a mix of apartments and condominiums, all residential units have been classified as apartments for the purposes of trip generation, in order to provide a more conservative analysis.

3) 10 percent internal capture adjustment assumed based on General Retail land use trips. Internal trips for the Apartment land use are based on the General Retail land use category.

4) Consistent with current LADOT Traffic Study Policies and Procedures, a 15 percent transit adjustment has been assumed for all uses (given that the Project is located within a one-quarter mile walking distance of the Pershing Square Metro rail station and multiple Metro RapidBus stops). Additionally, a 5 percent walk adjustment has been applied for all uses since the Project is located in the Central Business District, where the walk mode is well utilized.

5) Based on the current LADOT Traffic Study Policies and Procedures, appropriate pass-by trip adjustments have been applied to the General Retail land use category.

Table 6 in Traffic Impact Study, Crain & Associates, August 5, 2013.

Project Trip Distribution

Estimation of the geographic distribution of Project trips was the next step in the analytical process. The primary factors affecting the trip distribution pattern are the nature of the Project uses, existing traffic patterns, characteristics of the surrounding roadway system, geographic location of the Project Site and its proximity to freeways and major travel routes, employment centers to which residents would likely be attracted, and areas from which retail employees and patrons would likely be attracted.

Based on these factors, the overall Project trip distribution percentages were determined and are summarized in Table 4.16-6, Project Trip Distribution Percentages. The LADOT has approved these trip distribution assumptions.

**Table 4.16-6
Project Trip Distribution Percentages**

Direction	Residential Use	Commercial Uses
North	26%	25%
South	20%	24%
East	26%	26%
West	28%	25%
Total	100%	100%

Table 7 in Traffic Impact Study, Crain & Associates, August 5, 2013.

Project Traffic Assignment

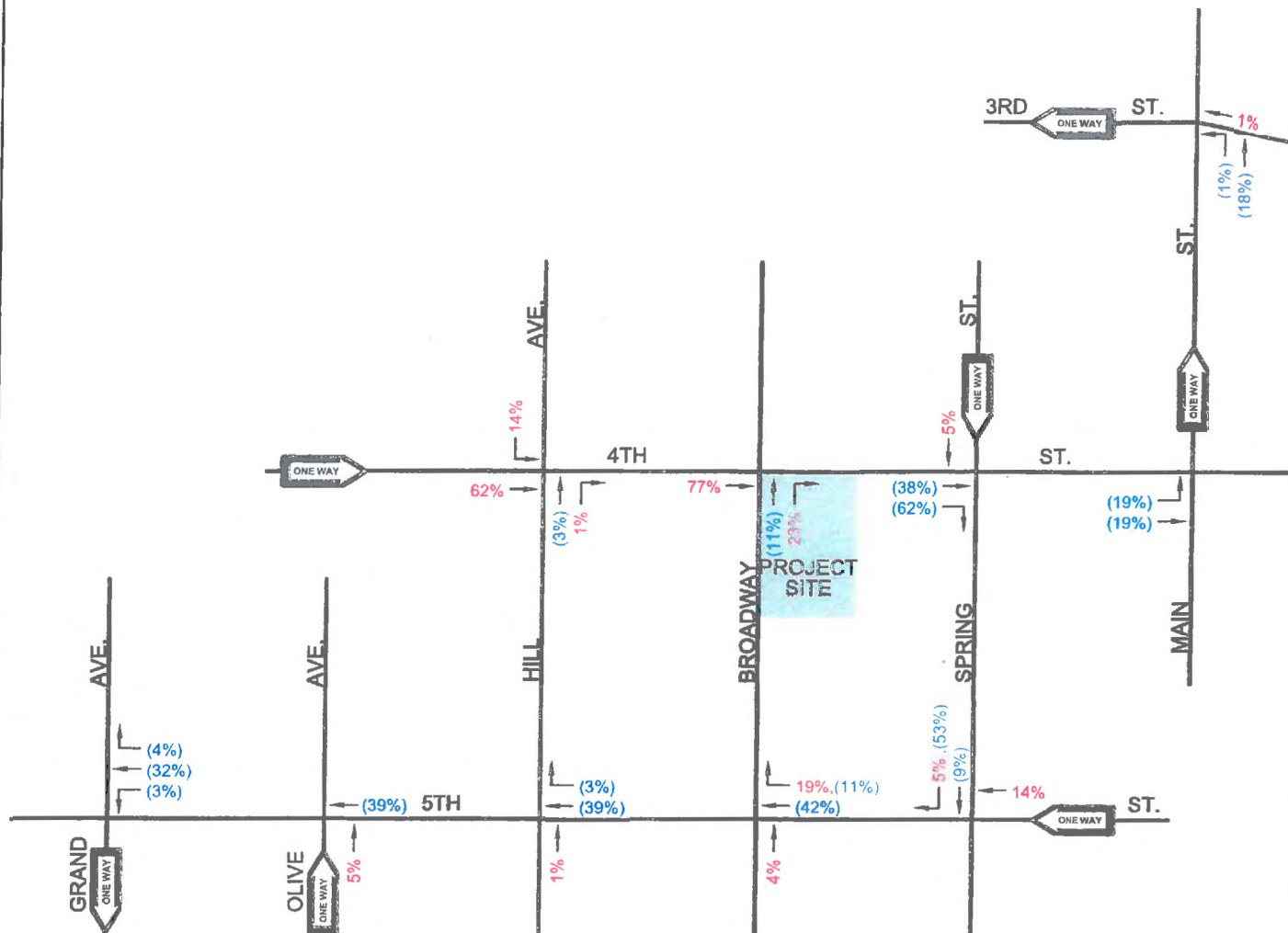
The general distribution percentages shown in Table 4.16-6 were then disaggregated and assigned to specific routes and intersections that are expected to be used for Project access. The estimated Project trip assignment percentages for the residential and commercial uses at the study intersections were reviewed and approved by LADOT staff and are presented on Figures 4.16-4 and 4.16-5, respectively. Applying these inbound and outbound percentages to the Project trip generation, the traffic volumes for the proposed Project were determined for the study intersections.

These Project-only AM and PM peak-hour traffic volumes are depicted on Figures 4.16-7 and 4.16-8, respectively.

Project Parking and Access

Parking for the proposed Project would be provided in accordance with the requirements of the City of Los Angeles Municipal Code (LAMC). The Project would provide on-site parking via a multi-level garage, with parking provided on five above-ground levels, the ground level, and two subterranean levels. As proposed, 450 total parking spaces would be provided between these parking levels. Based on the Project’s proposed mix of uses and the parking regulations of the Downtown Parking District (DPD), Central City Parking District (CCPD), and the Los Angeles City Bicycle Ordinance, adequate parking would be provided for the Project. Therefore, no off-site parking impacts are anticipated as a result of this Project.

Vehicular access to the Project Site parking would be provided by way of two full-access driveways and a loading-only driveway. A full-access driveway would intersect the south side of 4th Street, east of Broadway (in the vicinity of the existing Project driveway on 4th Street). A second full-access driveway and the loading-only driveway would intersect the west side of Frank Court, south of 4th Street. No Project access would be provided via Broadway.



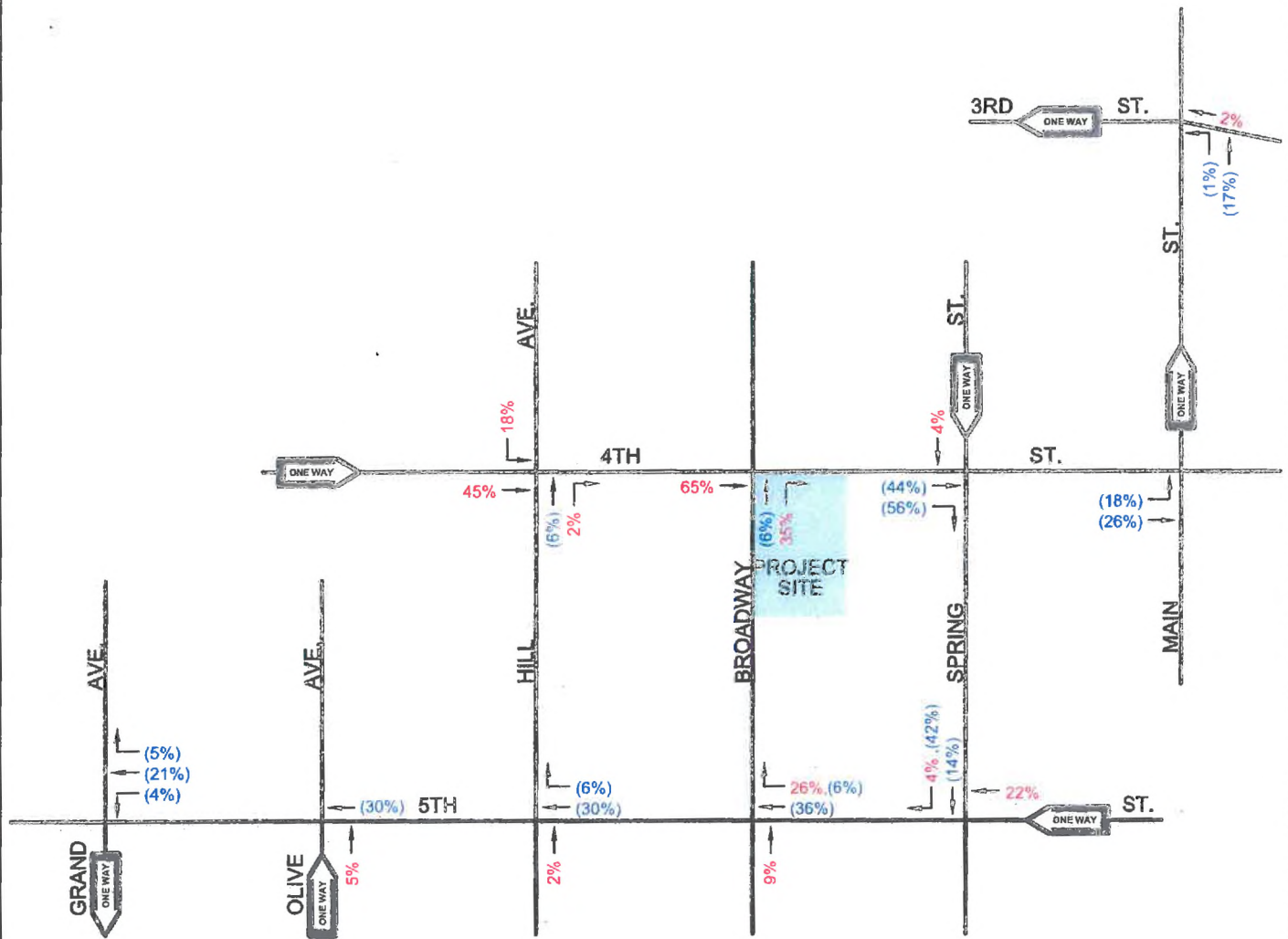
LEGEND

RED :INBOUND
 BLUE :OUTBOUND

Source: Figure 5(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



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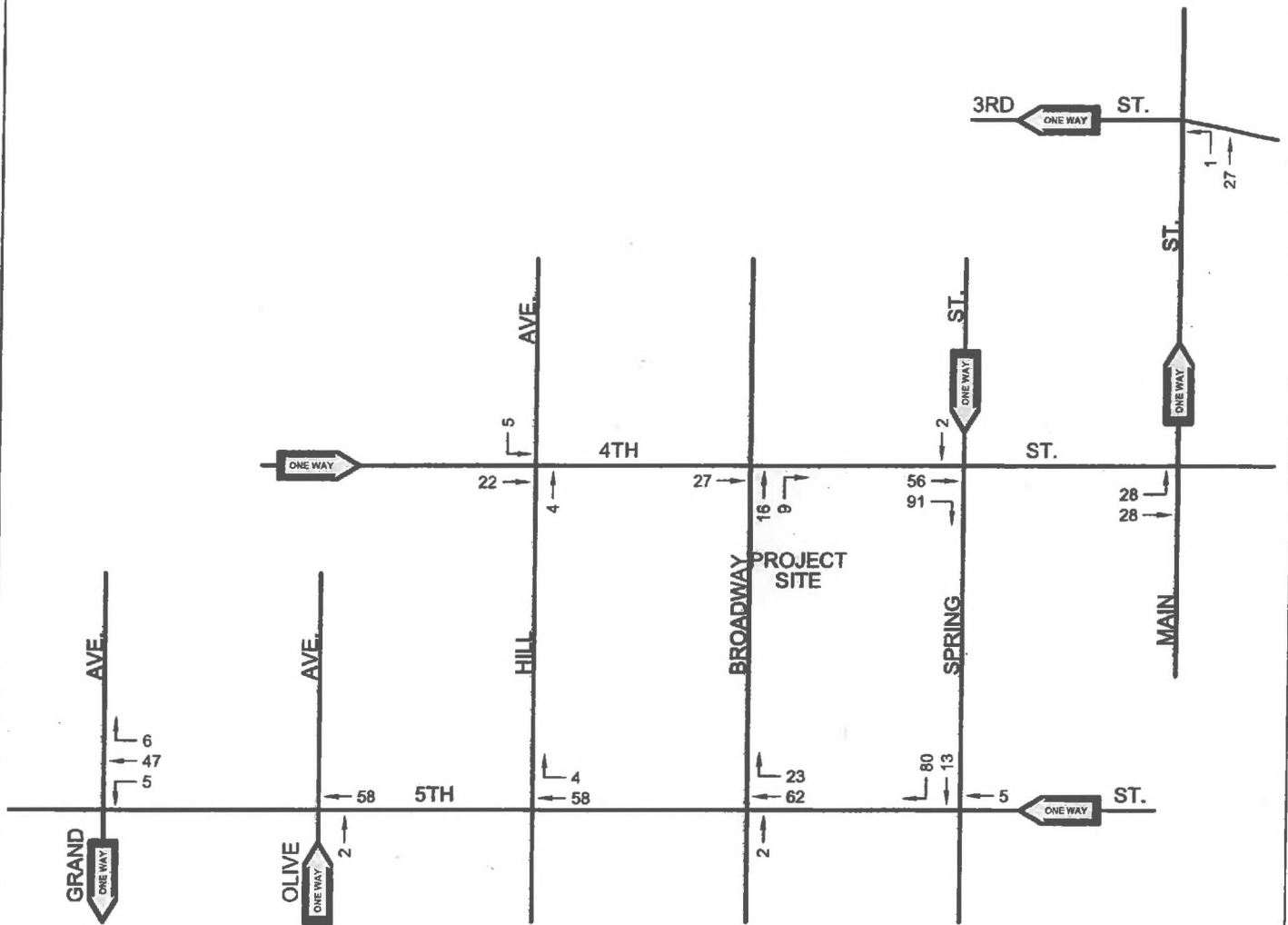
LEGEND

- RED :INBOUND
- BLUE :OUTBOUND



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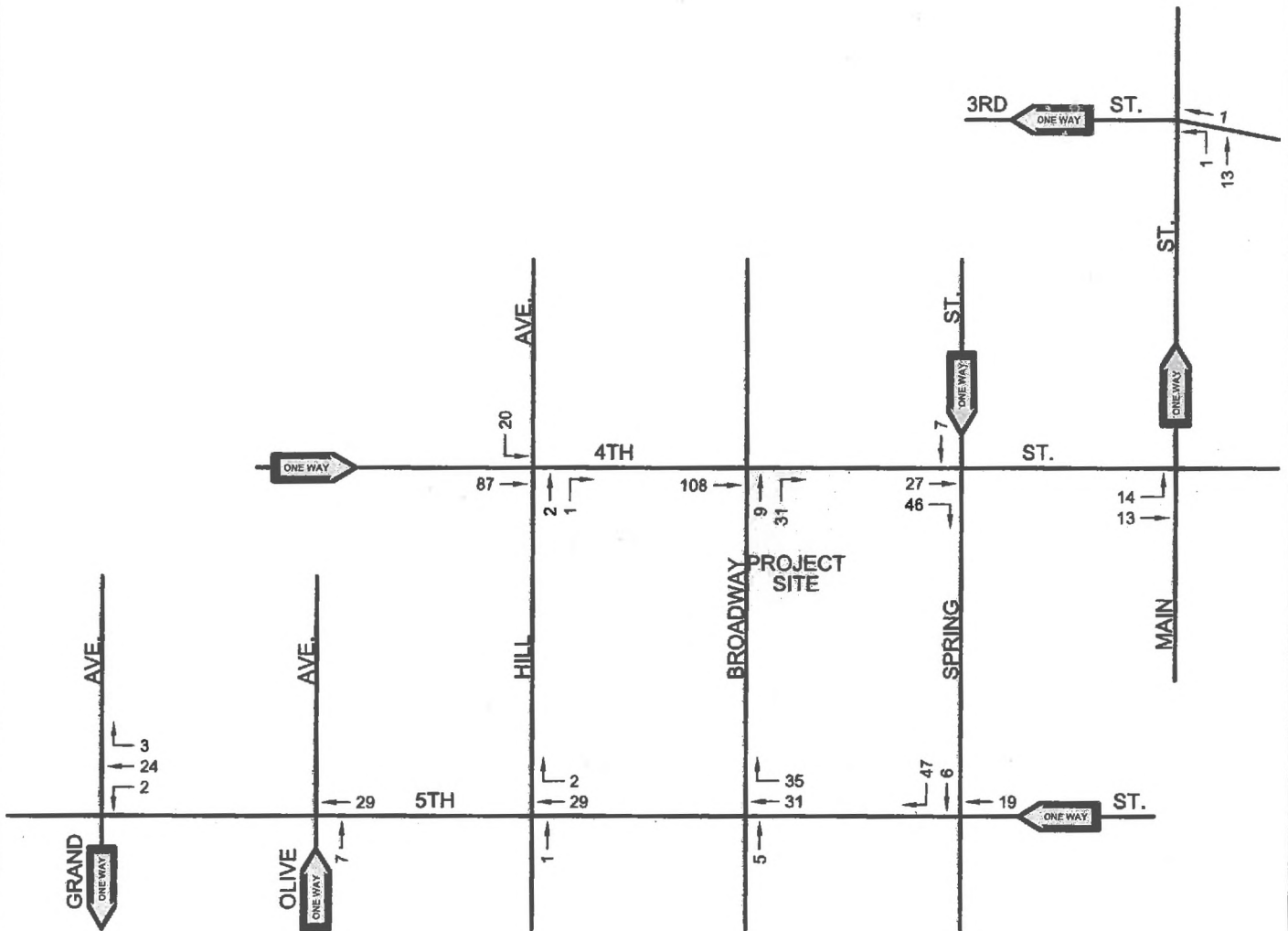
Source: Figure 5(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Source: Figure 6(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale



Source: Figure 6(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



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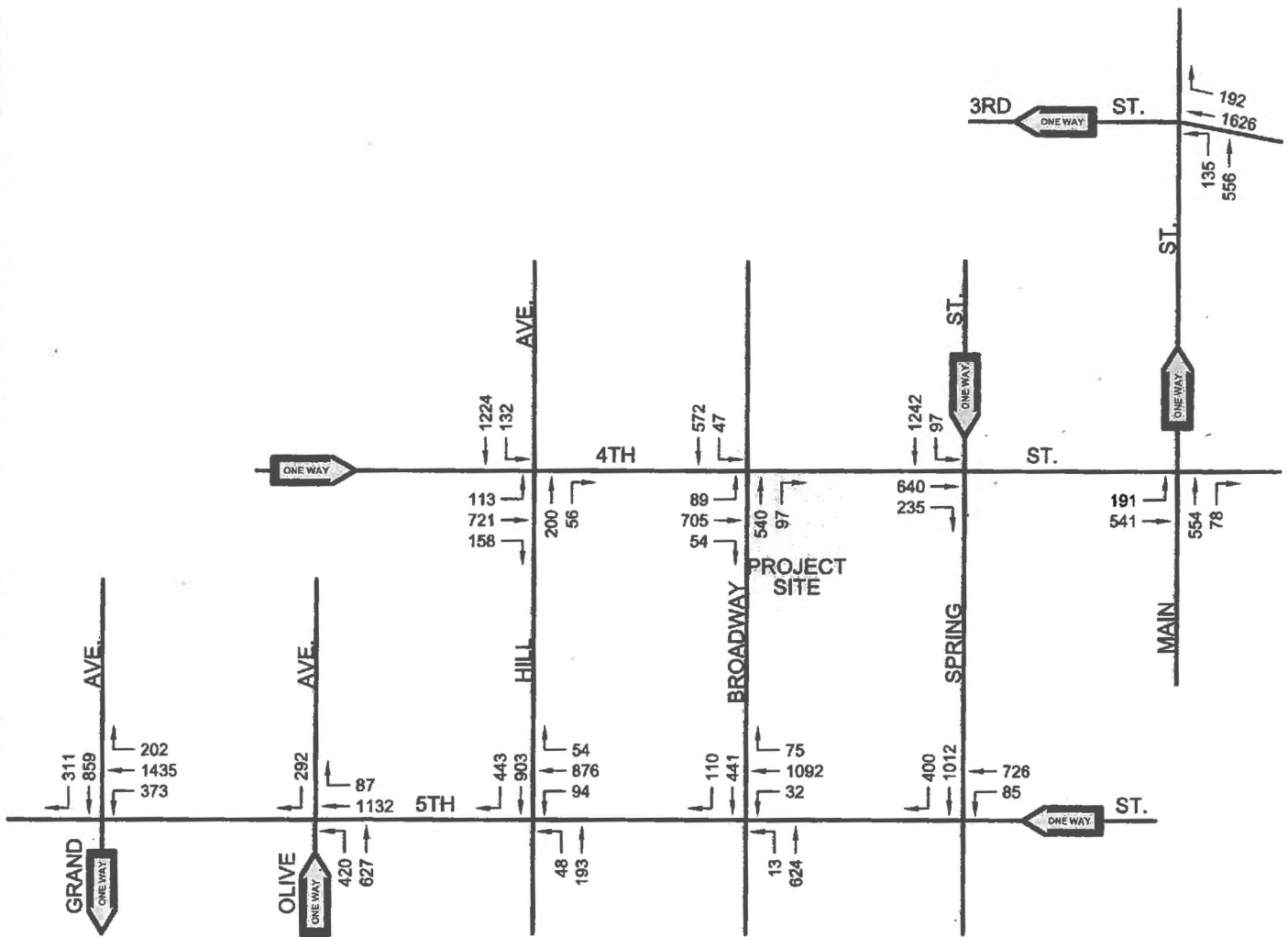
Existing Plus Project Traffic Conditions

Based on the December 16, 2010 decision of the California Sixth District Court of Appeal in the *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* case, an additional traffic impact analysis has been performed for the proposed Project. In the *Sunnyvale* case, the Court of Appeal found, based on the facts of that case, the impacts of a project must be compared “against current, existing physical conditions.” While the facts of the *Sunnyvale* case may be distinguishable from this case, in the interest of fullest disclosure an analysis of Existing (2013) Plus Project AM and PM peak-hour conditions was performed.

The Existing (2013) Plus Project traffic volumes were determined by superimposing the project-only traffic volumes onto the Existing (2013) traffic volumes.

The Existing (2013) Plus Project traffic volumes at the study intersections are shown on Figures 4.16-9 and 4.16-10 for the AM and PM peak hours, respectively.

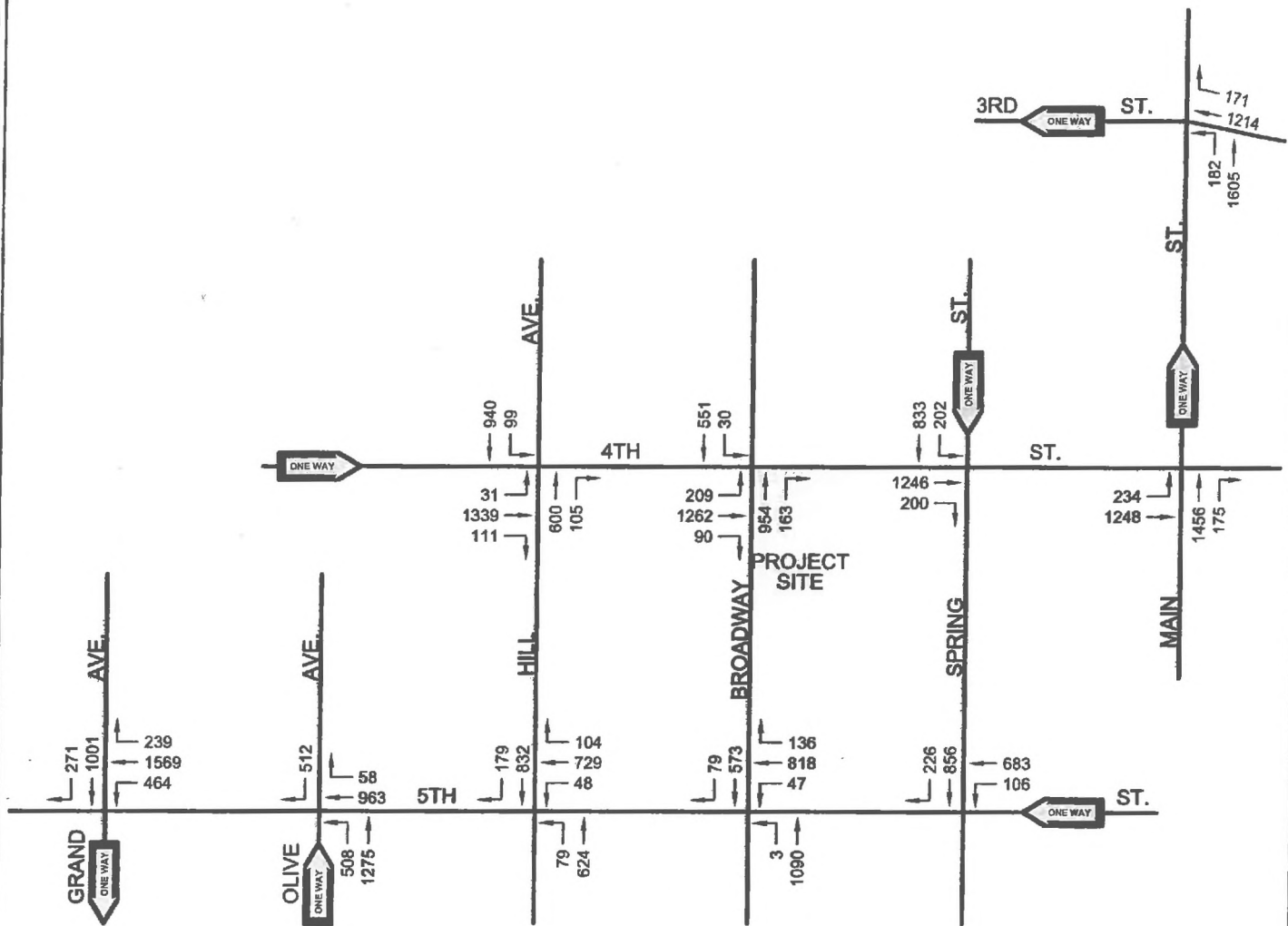
The analysis of Existing (2013) Plus Project traffic conditions at the study intersections was performed using the analysis procedures described previously. The results of the analysis of Existing (2013) Plus Project traffic conditions at the study intersections are summarized in Table 4.16-8, Critical Movement Analysis (CMA) and Level of Service (LOS) Summary Existing (2013) and Future (2017) Traffic Conditions.



Source: Figure 7(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale



Source: Figure 7(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale

Future Traffic Conditions

There are a number of other projects either under construction or planned for development in the surrounding area that may contribute future traffic to the study locations. For this reason, the analysis of future traffic conditions was expanded to include potential traffic volume increases expected to be generated by those other projects. In order to evaluate future traffic conditions in the Project area, an analysis of Existing (2013) traffic volumes was first conducted, as described previously. For the analysis of future conditions, an ambient traffic growth factor of 1.0 percent per year, compounded annually, was applied to these existing volumes at the 10 study intersections to develop future year (2017) baseline traffic volumes. Given that the proposed Project is currently estimated to be completed in 2017, that year was selected as the future study year, as agreed upon with LADOT during the traffic study scoping process.

The inclusion of the annual growth factor generally accounts for area-wide traffic increases. To ensure a conservative estimate of cumulative traffic conditions, the traffic generated by “related projects” in the study area was also added to the future baseline traffic volumes. The total future volumes, including those due to related projects, formed the basis for the Future (2017) Without Project condition.

Finally, the traffic expected to be generated by the Project was analyzed as an incremental addition to the Future (2017) Without Project condition, resulting in the Future (2017) With Project condition.

Ambient Traffic Growth

Based on an analysis of the trends in traffic growth in the Central City Community Plan Area, LADOT recommended the application of an ambient traffic growth factor of 1.0 percent per year. This growth factor was used to account for increases in traffic due to potential development projects not yet proposed or outside the study area. Compounded annually, the ambient traffic growth factor was applied to the existing (2013) traffic volumes to develop the estimated baseline volumes for the future study year (2017).

Related Projects

In addition to the use of the ambient growth rate, listings of potential projects located in the surrounding area (“related projects”) that might be developed or under construction within the study time frame were obtained from the LADOT and City of Los Angeles Planning Department in June 2013. Recently published traffic studies and environmental reports for development projects in the area were also reviewed. Related projects from these sources and within an approximate 1.0-mile radius of the Project Site were included. Refinement of the information resulted in a total of 44 related projects in the surrounding area that could add traffic to the study intersections.

The locations of the related projects are shown on Figure 4.16-11, Related Project Location Map. The related project locations, descriptions, and trip generation estimates are listed in Table 4.16-7, Related Project Locations, Descriptions, and Trip Generations.

This list of related projects accurately reflects the known related project proposals at the time the Traffic Study Memorandum of Understanding was scoped with and approved by the LADOT. The number of trips expected to be generated by the related projects was obtained from information provided by public agencies, traffic studies and environmental reports, to the extent available. For related projects with incomplete peak-hour directional (inbound/outbound) distribution information, directional estimates were determined by applying the appropriate directional splits from the ITE Trip Generation Manual (9th Edition, 2012).

For the analysis of Future (2017) Without Project traffic conditions, each related project's trip generation was distributed and assigned to the study area circulation system, using methodologies similar to those previously described for the proposed Project trip distribution and assignment. Summing the individual related project traffic volume assignments, the total related project traffic volumes at the study intersections were calculated and are shown on Figures 4.16-12 and 4.16-13 for the AM and PM peak hours, respectively.

It should be noted that the inclusion of these related projects, as described, results in future (2017) traffic condition forecasts that are conservative for the purposes of impact analysis. As stated previously, the 1.0 percent ambient traffic growth factor, approved by the LADOT, accounts for the general traffic growth expected throughout the study area.

The overlay of traffic volumes resulting from the 44 identified related projects represents a conservative projection of future traffic volumes. It is likely that some of the identified projects will not be approved or constructed as described. It is also probable that some of these projects will be delayed in their construction beyond the future (buildout) study year of the proposed Project. In addition, none of the mitigation measures proposed in the traffic analyses performed for these related projects have been assumed under future conditions. Therefore, the future condition of the study area roadway infrastructure has also been forecast conservatively.

**Table 4.16-7
Related Project Locations, Descriptions, and Trip Generations**

No.	Address/Location	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
1	1130 W Wilshire Boulevard ¹	86,844 sf (19,124 sf) (2,390 sf)	Office Office (to be removed) Restaurant (to be removed)	530	91	12	103	14	69	83
2	848 S Grand Avenue		<u>Embassy Tower</u> ²	9,574	91	387	478	582	357	939
3	1050 S Grand Avenue	151 DU 3,472 sf 2,200 sf	<u>Glass Tower Project</u> ³ Condominium Retail Restaurant	973	10	49	59	58	28	86
4	250 S Hill Street	330 DU 12,000 sf	<u>Zen Mixed-Use (Kawada Tower) Project</u> ³ Condominium Retail/Restaurant	1,551	21	103	124	92	46	138
5	930 W Wilshire Boulevard	100 DU 560 rm 20,000 sf 1,500 sf 50,000 sf 55,000 sf 150,000 sf (896 rm) (4,000 sf) (215,000 sf) (87,000 sf) (50,000 sf) (66,000 sf)	<u>Wilshire Grand Redevelopment Project</u> ⁴ High-rise Condominium Hotel Fitness Facility General Office Retail/Restaurant Meeting Room and Ballroom Ancillary Hotel, Restaurant, Office Hotel (to be removed) Fitness Facility (to be removed) General Office (to be removed) Retail/Restaurant (to be removed) Meeting Room and Ballroom (to be removed) Ancillary Hotel, Restaurant, Office (to be removed)	3,624	725	75	800	94	764	858
6	820 S Towne Avenue		<u>LAUSD 9th Span K-8 Redevelopment Project</u> ⁵	0	101	83	184	0	0	0

No.	Address/Location	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
		100 stu 405 stu	Elementary School Middle School							
7	1111 W Wilshire Boulevard ⁶	214 DU 7,743 sf	Apartment Restaurant	1,728	13	54	67	69	37	106
8	211 W Temple Street	30 emp 1,000 spa	<u>Hall of Justice Reuse Project ⁷</u> Government Building (net increase) Parking Structure	1,052	135	17	152	45	101	146
9	146 W 11th Street	575 DU 39,610 sf 39,725 sf	<u>Herald Examiner Mixed-Use Project ⁸</u> Condominium Retail Office	5,416	137	211	348	280	268	548
10	327 N Fremont Avenue ⁶	600 DU 30,000 sf	Apartment Retail	3,568	42	170	212	231	124	355
11	200 S Los Angeles Street	570 DU 280 DU 50,000 sf	<u>Ava Little Tokyo Mixed-Use Project ³</u> Condominium Apartment Retail	4,688	47	229	276	245	120	365
12	1254 W 3rd Street ⁶	363 DU 7,740 sf	Apartment Retail	1,691	23	90	113	92	49	141
13	454 E Commercial Street ⁹	2 ac	Bus Maintenance and Inspection Facility	0	26	4	30	1	9	10
14	315 W 9th Street	210 DU 9,000 sf	<u>Northeast Tower Mixed-Use Project ³</u> Condominium Retail	1,100	11	51	62	66	32	98
15	1027 W Wilshire Boulevard	402 DU 7,428 sf	<u>Tenten Wilshire Expansion Project ³</u> Condominium Retail	1,498	19	94	113	91	45	136
16	300 S Santa Fe Avenue		<u>One Santa Fe Mixed-Use Project ⁶</u>	8,741	113	451	564	480	258	738

No.	Address/Location	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
		420 DU 45,000 sf 7,500 sf 7,500 sf	Apartment Retail Fast-food Restaurant Quality Restaurant							
17	225 S Los Angeles Street	300 DU 3,400 sf	<u>Vibiana Lofts Mixed-Use Project</u> ³ Condominium Retail	1,910	38	186	224	84	42	126
18	1135 W 7th Street	130 DU 7,000 sf	<u>Lucas Ave and 7th Street Mixed-Use Project</u> ³ Condominium Retail	798	7	37	44	42	21	63
19	662 S Lucas Avenue ³	130 DU 7,037 sf	Condominium Retail	1,064	11	53	64	63	31	94
20	1133 S Hope Street	159 DU 6,827 sf	<u>Amacon Project</u> ³ Condominium Restaurant	1,063	9	42	51	62	30	92
21	503 S Olive Street	900 DU 19,000 sf 19,200 sf	<u>Park Fifth Project</u> ³ Condominium Retail Restaurant	1,284	10	49	59	77	38	115
22	905 E 2nd Street ³	302 DU 22,335 sf	Condominium Retail	1,248	11	51	62	63	31	94
23	745 S Spring Street ³	247 DU 10,675 sf	Condominium Retail	2,841	22	110	132	172	84	256
24	1115 Hill Street	172 DU 6,850 sf	<u>11th and Hill Project</u> ³ Condominium Restaurant	543	(1)	(4)	(5)	29	14	43
25	609 W 8th Street	225 DU 200 rm	<u>8th / Hope / Grand Project</u> ¹⁰ Condominium Hotel	4,908	97	97	194	269	132	401

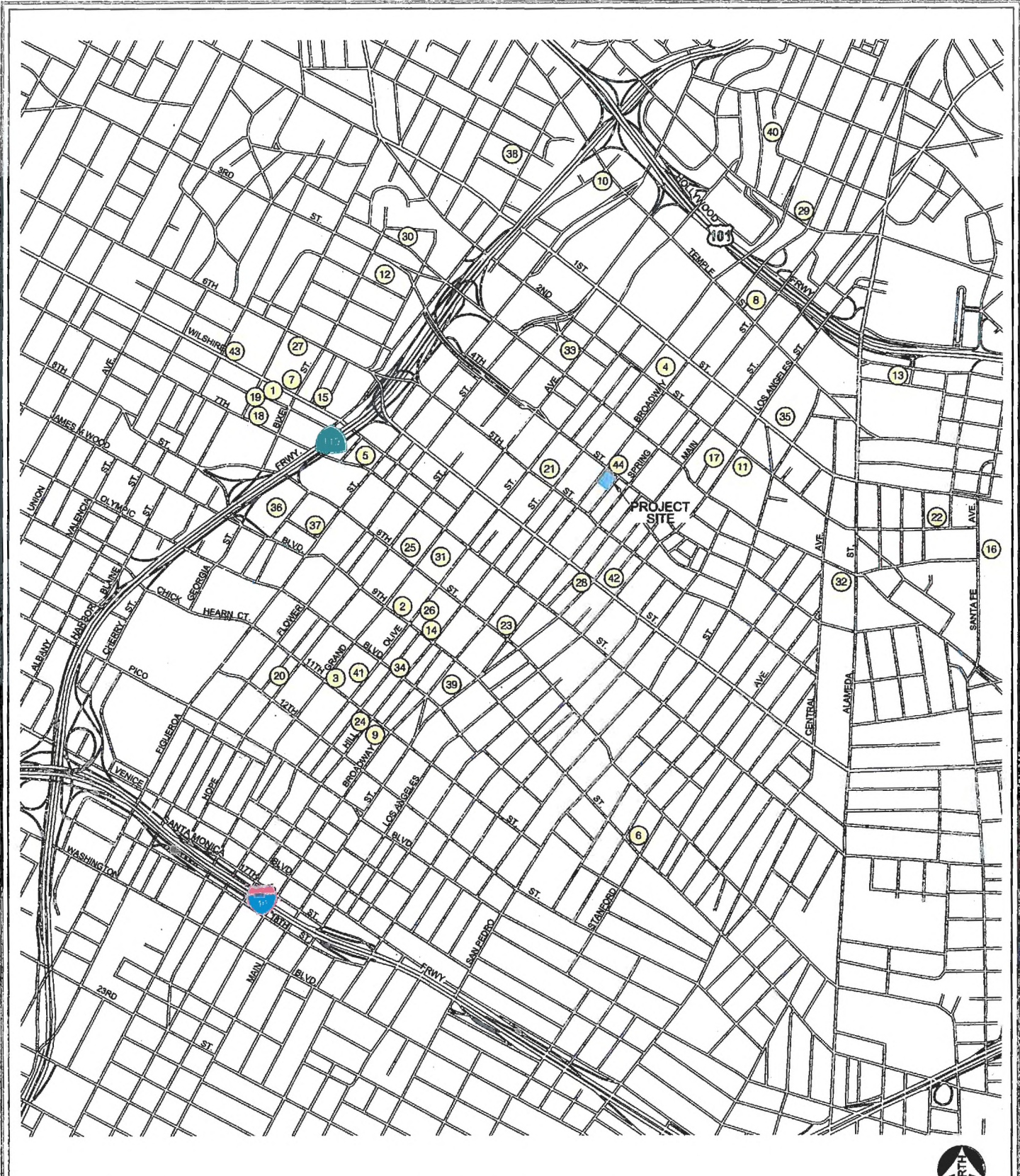
No.	Address/Location	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
		30,000 sf 32,000 sf	Retail Restaurant							
26	860 S Olive Street	303 DU 9,680 sf	<u>9th / Olive Mixed-Use Project</u> ³ Condominium Restaurant	3,007	42	203	245	177	87	264
27	1136 W 6th Street	648 DU 39,996 sf	<u>Bixel and Lucas Project</u> ¹¹ Apartment Retail	4,200	61	195	256	232	155	387
28	601 S Main Street	777 DU 20,000 sf	<u>6th and Main Residential Project</u> ² High-rise Condominium Retail	3,690	53	225	278	199	122	321
29	639 N Broadway	280 DU 22,000 sf	<u>Chinatown Gateway Mixed-Use Project</u> ⁶ Apartment Retail	2,665	30	122	152	161	86	247
30	1211 W Miramar Street	500 stu	<u>LAUSD Central Los Angeles High School #12</u> ¹³ High School	855	143	67	210	0	0	0
31	710 S Grand Avenue ⁶	700 DU 27,000 sf 5,000 sf	Apartment Retail Restaurant	3,131	36	145	181	170	92	262
32	333 S Alameda Street ¹⁴	40,800 sf	Family Entertainment (Bowling Alley)	0	0	0	0	32	21	53
33	100 & 237 S Grand Avenue	1,648 DU 412 DU 449,000 sf 681,000 sf	<u>Grand Avenue Implementation Plan Project</u> ³ Condominium Apartment Retail Office	0	264	1,287	1,551	1,651	813	2,464
34	301 W Olympic Boulevard	300 DU 14,500 sf 8,500 sf	<u>Olympic and Hill Mixed-Use Project</u> ⁶ Apartment Retail Restaurant	2,496	27	107	134	146	79	225

No.	Address/Location	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
35	150 N Los Angeles Street	712,500 sf 35,000 sf 2,500 sf	<u>LA Civic Center Office Project</u> ⁷ Government Office Building Retail Child Care	13,534	933	115	1,048	426	948	1,374
36	851 S Francisco Street	836 DU 988,225 sf 480 rm 46,000 sf	<u>Metropolis Mixed-Use Project</u> ¹⁵ Condominium Office Hotel Retail	8,010	307	318	625	386	512	898
37	845 S Figueroa Street	21,122 sf	<u>Smart and Final Project</u> ¹⁶ Discount Supermarket	0	1	0	1	35	35	70
38	1200 W Colton Street ¹	Size not provided	LAUSD CLASHS #11 HRD/PDC Office/Conf. Space	653	81	11	92	16	79	95
39	928 and 1026 S Broadway	667 DU 17 DU 47,600 sf 11,100 sf (34,824 sf)	<u>Olympic and Broadway Mixed-Use Project</u> ¹⁷ Apartment Live/Work Retail Commercial Live/Work Space Office (to be removed)	4,715	21	229	250	272	109	381
40	715 N Yale Street ⁶	65 DU	Apartment	437	7	27	34	26	14	40
41	1027 S Olive Street ⁶	100 DU	Apartment	632	10	38	48	38	21	59
42	534-552 S Main Street 539-547 S Los Angeles Street	160 DU 18,000 sf 3,500 sf 3,500 sf (34,824 sf)	<u>LA Main Apartments Project</u> ¹⁸ Apartment Retail Quality Restaurant Fast-food Restaurant Office (to be removed)	2,213	52	75	127	87	58	145
43	1239 W Wilshire Boulevard ¹⁹	56,450 sf	Medical Office	2,040	111	29	140	59	151	210
44	348 S Broadway		<u>348 S. Broadway Mixed-Use Project</u> ²⁰	2,584	77	134	211	139	115	254

No.	Address/Location	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
		397 DU	Apartment							
		43,142 sf	Office							
		37,718 sf	Retail							
		(18,000 sf)	Retail (to be removed)							

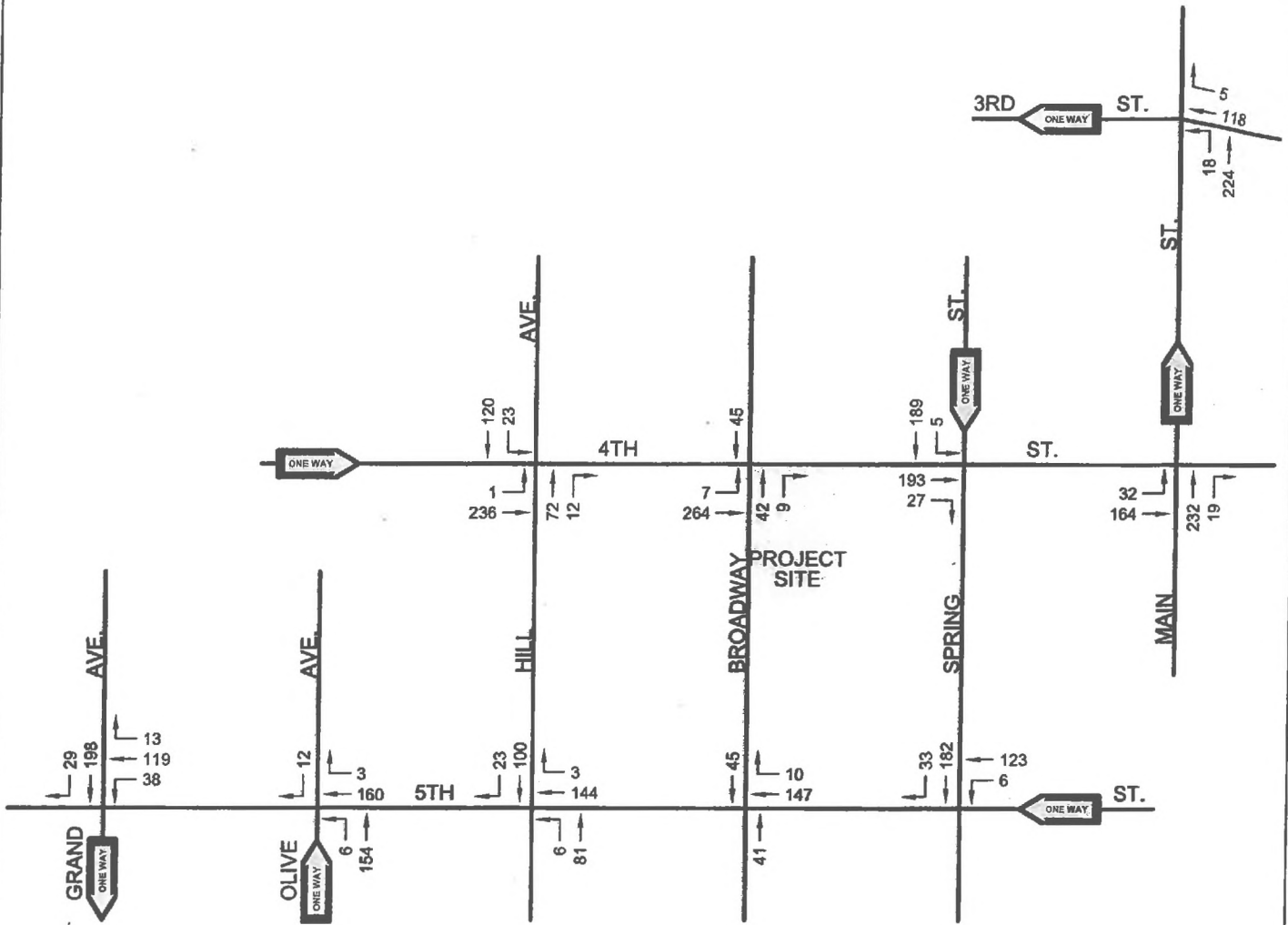
- Notes:
- sf = Square Feet; du = Dwelling Units; rm = Rooms; stu = Students; emp = Employees; spa = Parking Spaces.
 - 1 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 710 (Office).
 - 2 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 232 (High-Rise Condominium/Townhouse).
 - 3 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 230 (Residential Condominium/Townhome).
 - 4 Transportation Study for the Wilshire Grand Redevelopment Project (Gibson Transportation Consulting, April 2010).
 - 5 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 522 (Middle School/Junior High School).
 - 6 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 220 (Apartment).
 - 7 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 733 (Government Office Complex).
 - 8 Traffic Analysis for the Herald Examiner Mixed-Use Project (Crain & Associates, December 2005).
 - 9 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 110 (General Light Industrial).
 - 10 Net trip generation provided by the LADOT database. PM peak-hour directional distribution of trips based on ITE Land Use Code 230 (Residential Condominium/Townhouse); AM assumed to be 50%/50%.
 - 11 Supplemental Traffic Analysis for the Bixel & Lucas Project (Crain & Associates, June 22, 2011).
 - 12 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 140 (Manufacturing).
 - 13 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 530 (High School).
 - 14 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 437 (Bowling Alley).
 - 15 Traffic Impact Study and Parking Analysis for the Metropolis Mixed-Use Project (Crain & Associates, August 2007).
 - 16 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 854 (Discount Supermarket).
 - 17 Traffic Impact Study for Olympic & Broadway Mixed-Use Project (Crain & Associates, March 1, 2013).
 - 18 Traffic Impact Study for LA Main Apartments Project (Crain & Associates, March 2013).
 - 19 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 720 (Medical-Dental Office Building).
 - 20 Traffic Impact Study Memorandum of Understanding for the 348 S Broadway Mixed-Use Project (Crain & Associates, May 2013).

Table 8 in Traffic Impact Study, Crain & Associates, August 5, 2013.



Source: Figure 8, Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.

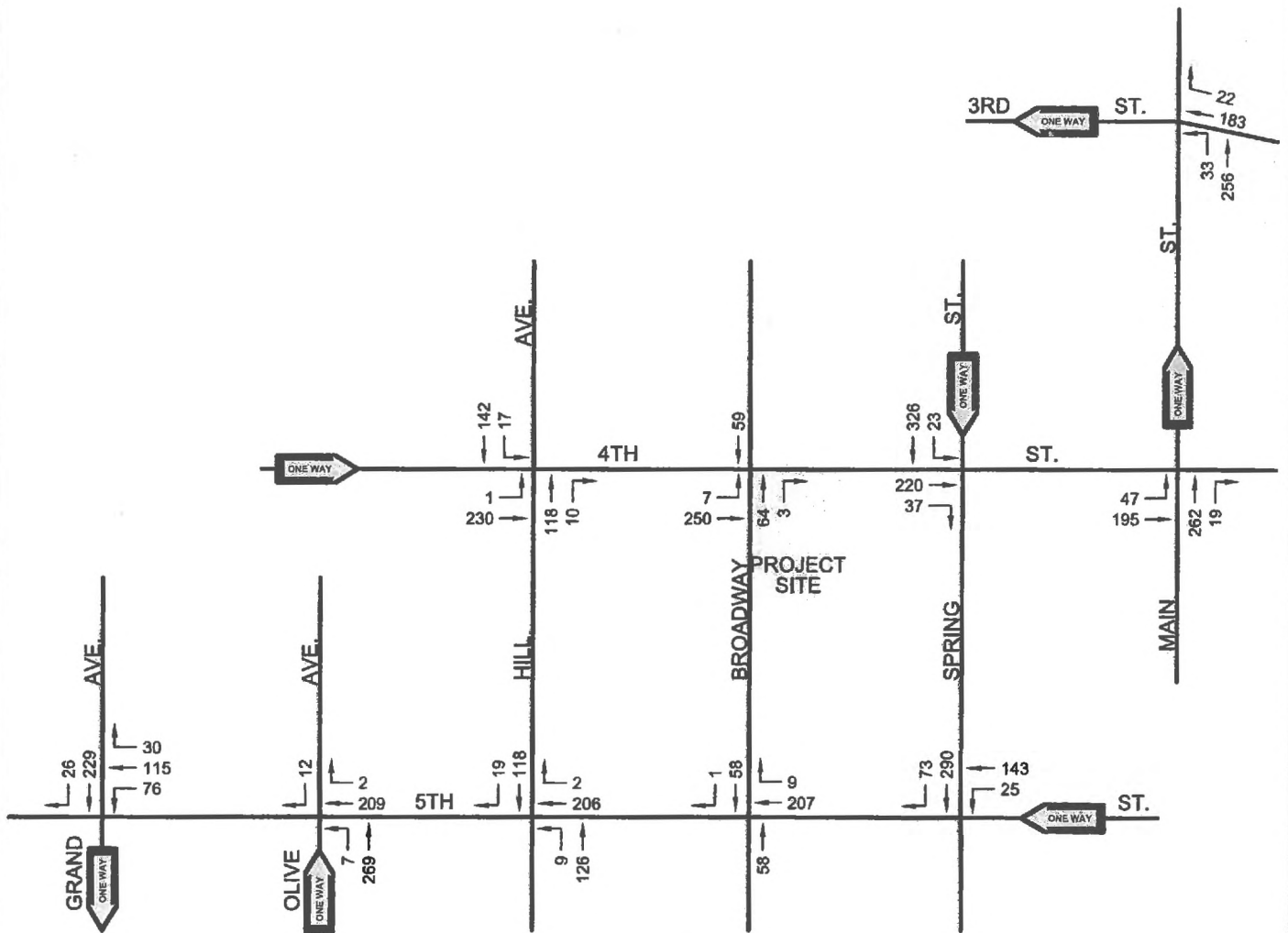




Source: Figure 9(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale



Source: Figure 9(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale

Highway System Improvements

In order to better analyze future traffic conditions in the Project area, an investigation regarding relevant future transportation improvements to the roadway system infrastructure in the study area was conducted. A number of traffic improvements were identified as scheduled for implementation that would affect use of the existing street system.

All of the study intersections are tentatively scheduled to be upgraded to the City's combined ATSAC/ATCS system in mid-2016. The ATSAC/ATCS signal enhancements have been recognized to increase intersection capacities by approximately 10 percent at locations where they have been installed. Given that these improvements are scheduled to occur before the buildout year of the Project, these ATSAC/ATCS improvements have been incorporated into the analysis of future (2017) traffic conditions.

In addition to these traffic signal enhancements, further implementation of the City's 2010 *Bicycle Plan* is expected over the coming years. In addition to the recently installed bicycle lanes on Spring Street and Main Street, which are part of the "Backbone Network," Hill Street is designated to have a future bicycle lane as part of the "Neighborhood Network" within the plan. The future bicycle lane on Hill Street will run between 4th Street and 23rd Street. Per the 2010 *Bicycle Plan: Five-Year Implementation Strategy* prepared on January 12, 2011 by the Department of City Planning and the LADOT, 185.7 miles of Backbone Network bicycle facilities and 67.5 miles of Neighborhood Network bicycle facilities were designated as priorities for implementation between 2011 and 2016. The aforementioned segment of Hill Street was not included in this five-year implementation strategy. Therefore, this bicycle lane improvement was not incorporated in the future (2017) traffic conditions analysis for the proposed Project.

Another street improvement project that could affect the study intersections is the Broadway Streetscape Project (BSP). The BSP will implement streetscape enhancements along Broadway between 2nd Street and Olympic Boulevard in order to establish a more transit-focused roadway with better pedestrian design. In order to do this, the BSP will provide wider sidewalks and curb extensions along Broadway and reduce the number of travel lanes to three (two lanes northbound and one lane south-bound). The single southbound lane will be shared by passenger vehicles and a proposed street car line.

Per recent discussions with LADOT, the BSP design will allow for turns to be made at all affected intersections for northbound Broadway motorists. Left-turn movements will be restricted for southbound Broadway motorists, but right-turns will be allowed. Additionally, exclusive right-turn lanes will be supplied for southbound Broadway at its intersections with 3rd Street, 5th Street, and 8th Street. These geometric changes to study intersections along Broadway have been incorporated in the future (2017) traffic conditions analysis for the proposed Project.

Given that the BSP will reduce the northbound and southbound through capacity on Broadway within the study area, it is anticipated that northbound and southbound traffic volumes will shift accordingly to parallel roadways. In order to determine the magnitude of these traffic volume shifts, the Broadway

Streetscape Plan Preliminary Traffic Study prepared by the IBI Group (October 1, 2010) was reviewed. The BSP Preliminary Traffic Study examined three potential “with project” options for the design of Broadway, the third of which conforms to the BSP adopted by the City Planning Commission in February 2013. By comparing the future year intersection volumes between the “without project” (no build) and “with Option 3” scenarios, the anticipated shifts in traffic volumes due to the BSP implementation were determined.

These future traffic adjustments have been included in the future (2017) traffic conditions analysis for the proposed Project.

A review of the current City of Los Angeles Capital Improvement Program (CIP) and Bureau of Engineering Street Improvement Master Schedule did not reveal any other improvement projects that would significantly affect operations at the study intersection locations.

Analysis of Future (2017) Traffic Conditions

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described previously. For the analysis of future Project traffic impacts, the aforementioned highway system improvements were incorporated where appropriate. At study locations where no improvements to lane geometries were identified, existing roadway geometric characteristics were assumed to prevail.

Future (2017) baseline traffic volumes for the Without Project condition were determined by superimposing area-wide ambient traffic growth and the total related projects traffic volumes onto the existing (2013) traffic volumes.

The Future (2017) Without Project traffic volumes are depicted on Figures 4.16-14 and 4.16-15 for the AM and PM peak hours, respectively.

Project volumes were then added to the Future (2017) Without Project traffic volumes to develop the Future (2017) With Project volumes. The Future (2017) With Project volumes were then used to determine traffic impacts directly attributable to the proposed Project.

The Future (2017) With Project AM and PM peak-hour traffic volumes are shown on Figures 4.16-16 and 4.16-17, respectively.

The results of the analysis of existing and future traffic conditions at the study intersections are summarized in Table 4.16-8, Critical Movement Analysis (CMA) and Level of Service (LOS) Summary Existing (2013) and Future (2017) Traffic Conditions. As shown, the addition of Project-related traffic to existing traffic conditions would not deteriorate the LOS at any study intersections during either peak hour.

Under Existing (2013) Plus Project conditions:

- all 10 study intersections would continue to operate at LOS A during both peak hours.

Under Future (2017) Without Project conditions:

- traffic operations at five of the 10 study intersections are expected to deteriorate when compared with existing conditions,
- five study intersections would operate at LOS A during both peak hours,
- four study intersections would operate at LOS B or better during both peak hours, and
- one study intersection would operate at LOS C or better during both peak hours.

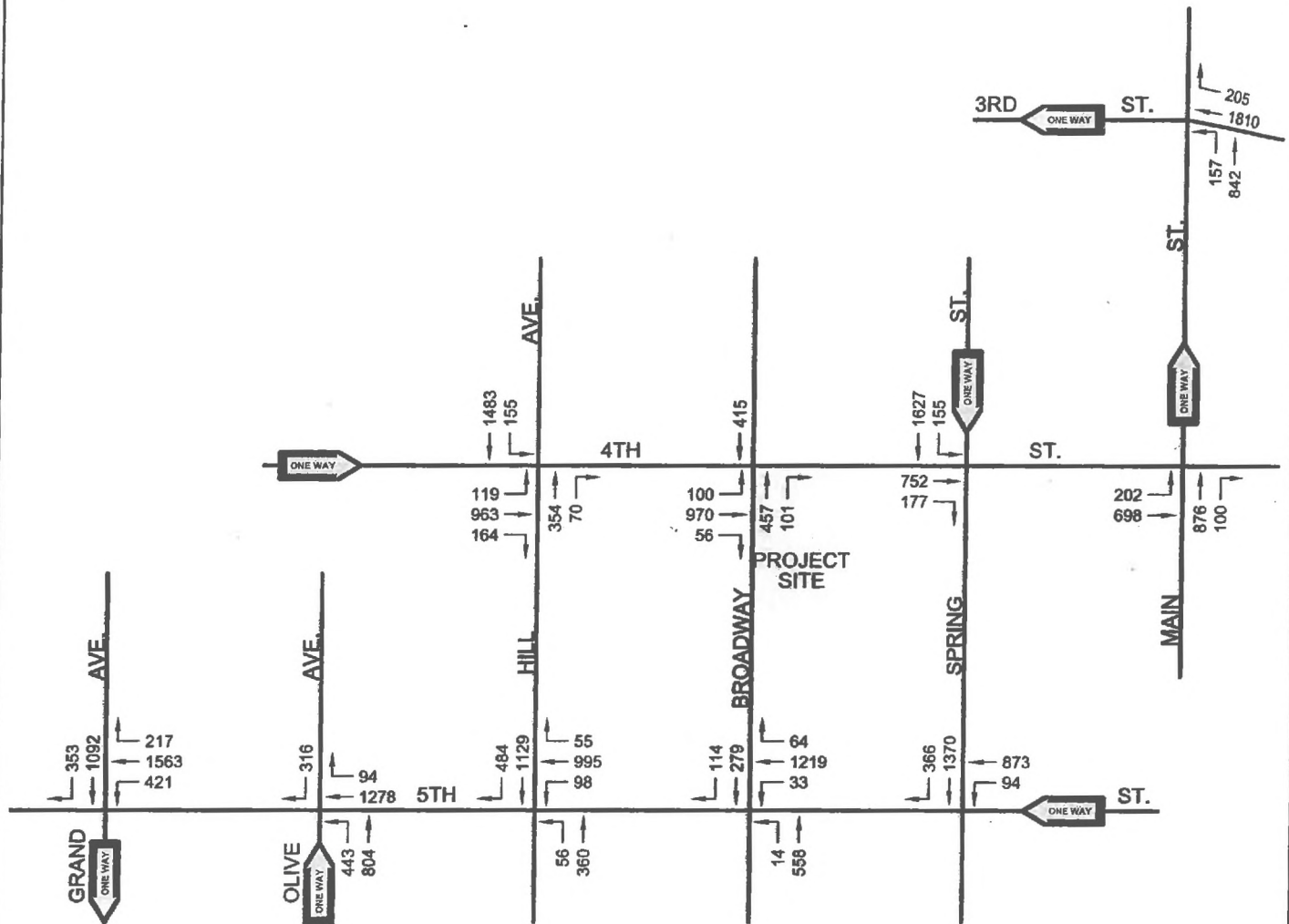
Under Future (2017) With Project conditions:

- the addition of Project-related traffic would deteriorate the LOS at only one intersection (4th Street & Hill Street) during one peak hour (PM peak hour: from LOS A to LOS B),
- five study intersections would operate at LOS A during both peak hours,
- four study intersections would operate at LOS B or better during both peak hours, and
- one study intersection would operate at LOS C or better during both peak hours.

**Table 4.16-8
Critical Movement Analysis (CMA) and Level of Service (LOS) Summary Existing (2013) and Future (2017) Traffic Conditions**

No.	Intersection	Peak Hour	Existing (2013) Conditions					Future (2017) Conditions					
			Existing		Plus Project			Without Project		With Project			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	Sig.?
1	3 rd Street / Main Street	AM	0.439	A	0.445	A	0.006	0.524	A	0.530	A	0.006	No
		PM	0.593	A	0.597	A	0.004	0.718	C	0.721	C	0.003	No
2	4 th Street / Hill Street	AM	0.500	A	0.503	A	0.003	0.603	B	0.606	B	0.003	No
		PM	0.476	A	0.490	A	0.014	0.581	A	0.599	B	0.018	No
3	4 th Street / Broadway	AM	0.319	A	0.330	A	0.011	0.427	A	0.433	A	0.006	No
		PM	0.507	A	0.528	A	0.021	0.523	A	0.554	A	0.031	No
4	4 th Street / Spring Street	AM	0.470	A	0.519	A	0.049	0.606	B	0.655	B	0.049	No
		PM	0.387	A	0.401	A	0.014	0.527	A	0.541	A	0.014	No
5	4 th Street / Main Street	AM	0.340	A	0.359	A	0.019	0.492	A	0.511	A	0.019	No
		PM	0.496	A	0.501	A	0.005	0.610	B	0.615	B	0.005	No
6	5 th Street / Grand Avenue	AM	0.371	A	0.379	A	0.008	0.407	A	0.414	A	0.007	No
		PM	0.420	A	0.424	A	0.004	0.487	A	0.490	A	0.003	No
7	5 th Street / Olive Street	AM	0.368	A	0.376	A	0.008	0.402	A	0.412	A	0.010	No
		PM	0.564	A	0.569	A	0.005	0.656	B	0.662	B	0.006	No
8	5 th Street / Hill Street	AM	0.408	A	0.419	A	0.011	0.489	A	0.499	A	0.010	No
		PM	0.394	A	0.399	A	0.005	0.489	A	0.494	A	0.005	No
9	5 th Street / Broadway	AM	0.272	A	0.286	A	0.014	0.315	A	0.329	A	0.014	No
		PM	0.330	A	0.341	A	0.011	0.428	A	0.441	A	0.013	No
10	5 th Street / Spring Street	AM	0.287	A	0.332	A	0.045	0.366	A	0.369	A	0.003	No
		PM	0.247	A	0.251	A	0.004	0.352	A	0.357	A	0.005	No

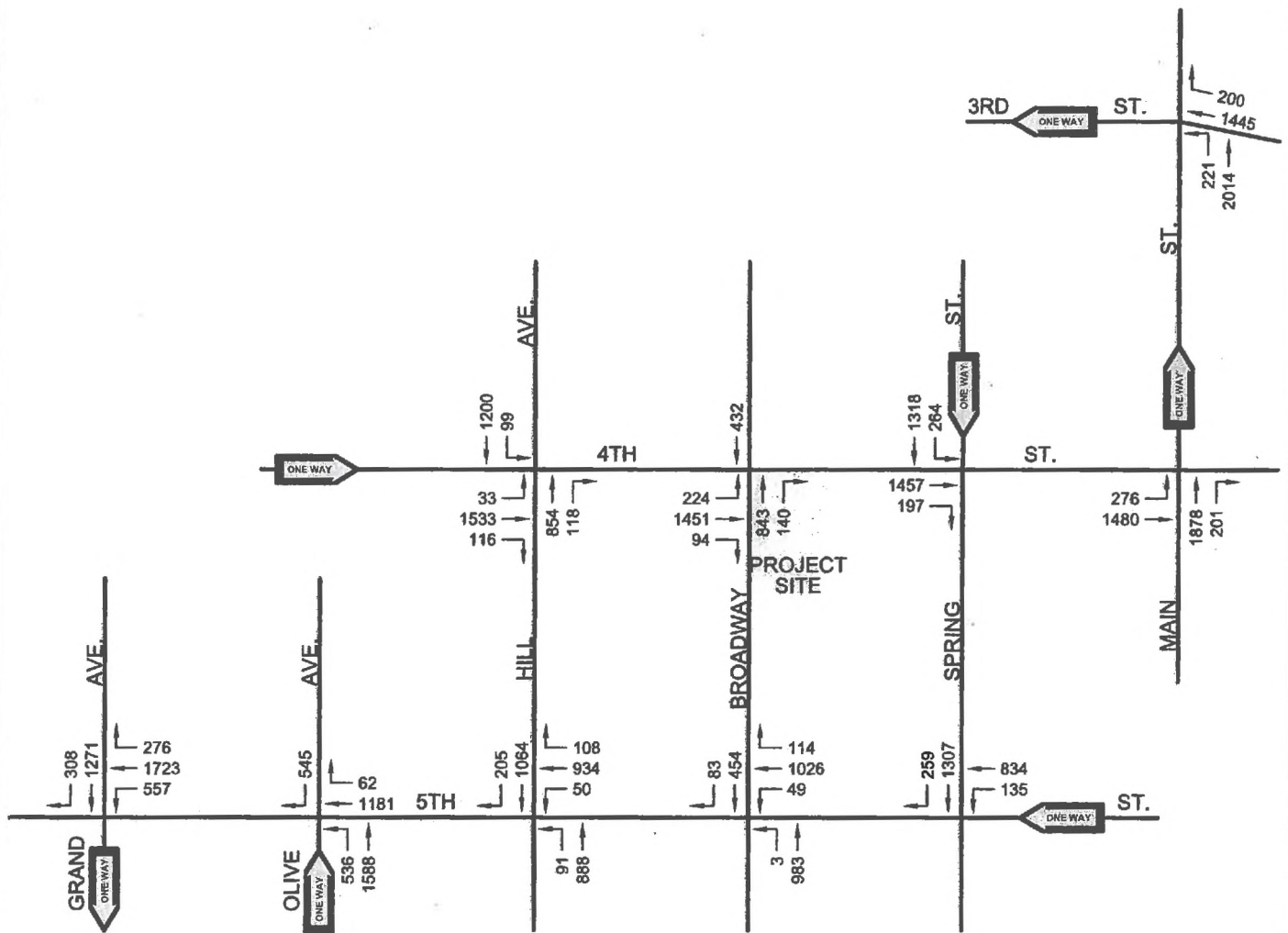
Table 9 in Traffic Impact Study, Crain & Associates, August 5, 2013.



Source: Figure 10(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



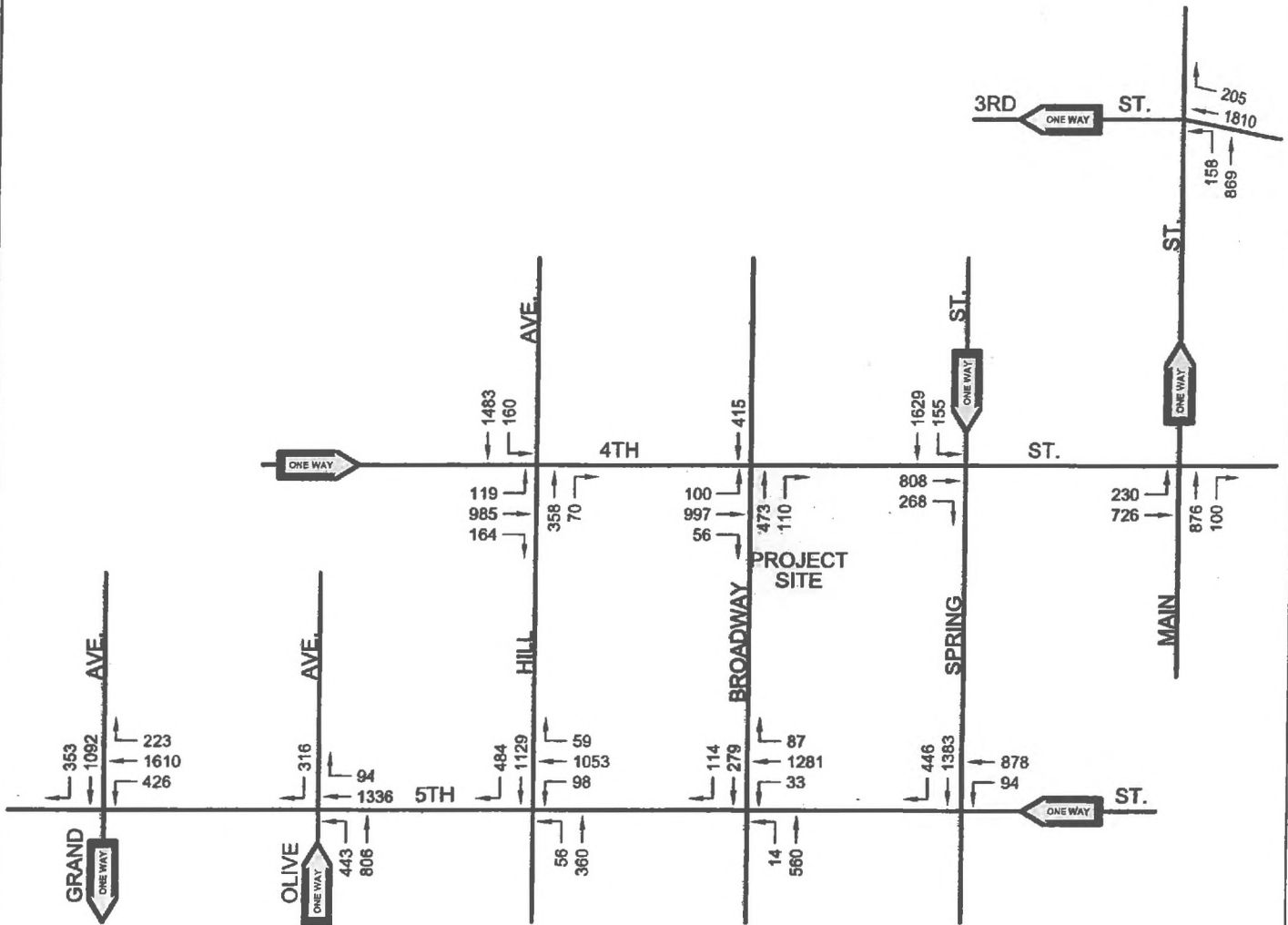
Not to Scale



Source: Figure 10(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



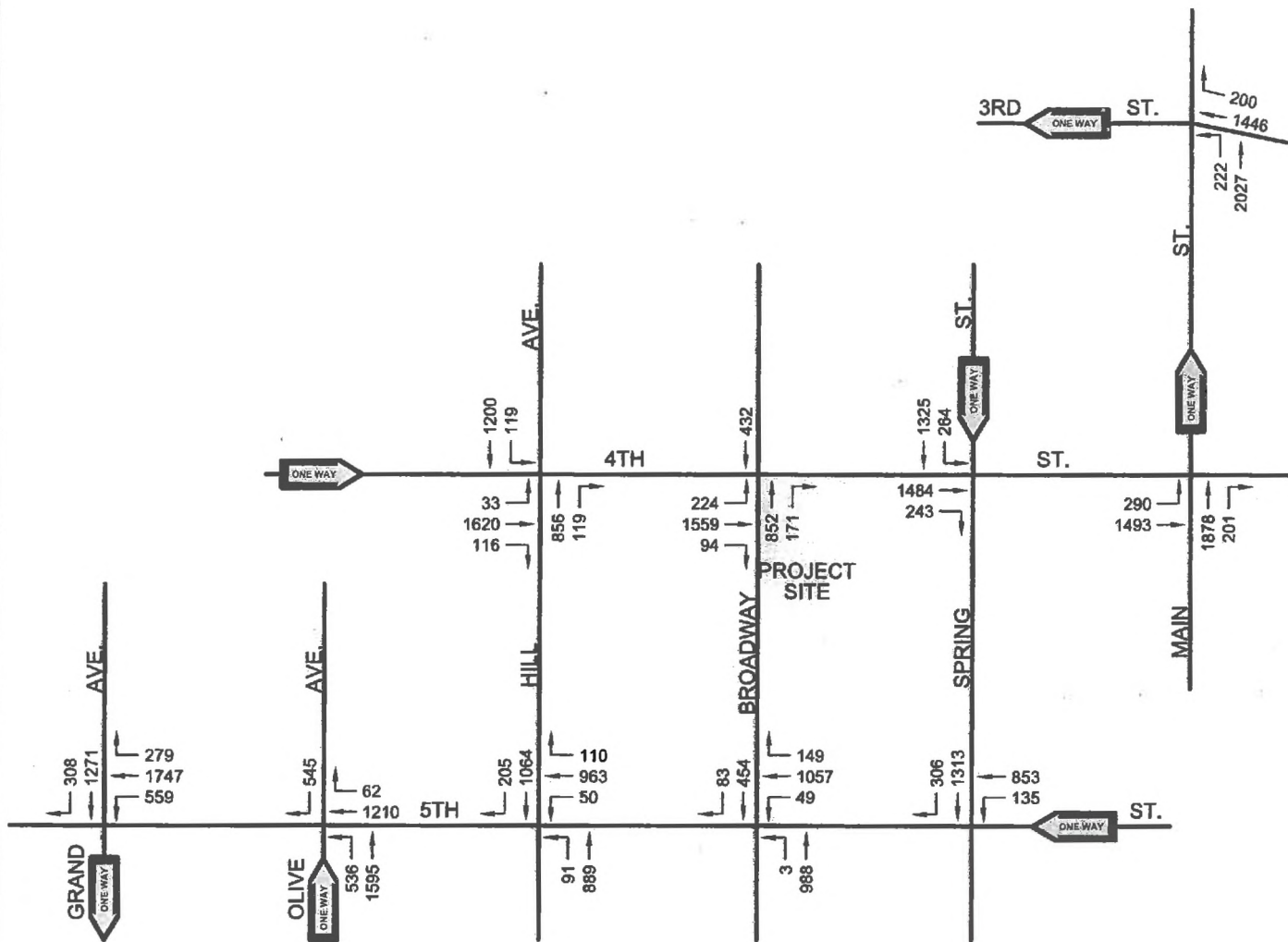
Not to Scale



Source: Figure 11(a), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale



Source: Figure 11(b), Traffic Impact Study for the Proposed 400 S. Broadway Mixed-Use Project, City of Los Angeles, Crain & Associates, August 5, 2013.



Not to Scale

Significant Traffic Impact Criteria

LADOT defines a significant intersection traffic impact attributable to a project based on a “stepped scale”, with intersections experiencing high CMA values being more sensitive to additional traffic than those operating with more available capacity.

According to LADOT policy, a significant impact is identified as an increase in the CMA value, due to project-related traffic under future buildout conditions, of 0.010 or more when the final (with project) LOS is E or F, a CMA increase of 0.020 or more when the final LOS is D, or an increase of 0.040 or more when the final LOS is C. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays.

These criteria are summarized in Table 4.16-9, LADOT Criteria for Significant Intersection Traffic Impacts.

**Table 4.16-9
LADOT Criteria for Significant Intersection Traffic Impacts**

LOS	Final (With Project) CMA Value	Project-Related Increase in CMA Value
C	$> 0.700 \leq 0.800$	Equal to or greater than 0.040
D	$> 0.800 \leq 0.900$	Equal to or greater than 0.020
E or F	> 0.900	Equal to or greater than 0.010

Table 10 in Traffic Impact Study, Crain & Associates, August 5, 2013.

Based on these criteria and as shown previously in Table 4.16-8, the proposed Project would not significantly impact any of the study intersections during either peak hour.

The Project is not expected to significantly impact any of the 10 study intersections, any CMP monitoring locations, or public transit. Therefore, no transportation-related mitigation measures are required of the Project.

- b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less Than Significant Impact. A significant impact may occur if the adopted Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional

traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

Congestion Management Program (CMP) Impact Analysis

The traffic impact guidelines of the current 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

The nearest CMP arterial monitoring locations are the following intersections:

- Alameda Street/Washington Boulevard (approx. 2 miles southeast of the Project Site)
- Alvarado Street/Wilshire Boulevard (approx. 1.75 miles northwest)

The Project is expected to contribute 50 or more peak-hour trips only to several intersections in the direct vicinity of the Project Site. Based on the distance between the Project Site and above-mentioned monitoring locations, the Project traffic contributions at these intersections would be minimal. With Project traffic contributions well below the 50-trip threshold, no significant Project impacts to CMP arterial monitoring locations are forecast and no additional arterial intersection analysis is necessary.

In terms of CMP freeway monitoring segment analysis, a review of the proposed Project's trip generation indicates that the Project would not generate more than 147 total directional (inbound or outbound) trips beyond the study area, during either peak hour.

Given the distance between the Project Site and the surrounding freeways, as well as the anticipated distribution of Project trips, the Project would contribute well below the 150 directional-trip threshold to all CMP freeway monitoring segments, no significant Project impacts to CMP freeway monitoring locations are forecast, and no additional freeway analysis is necessary.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it were an aviation-related use.

The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, no impact resulting from hazardous design features would occur.

Temporary impacts to pedestrian safety could occur during proposed grading, exporting, and construction in close proximity to a school. However, there are no public schools within 0.25 mile (1,320 feet) of the Project Site.¹⁵⁴

The Project will obtain a haul route approval (see **Mitigation Measure 16-1**). The Project will also comply with **Mitigation Measures 16-2 and 16-3 (recommendation from LADOT¹⁵⁵)**. These measures will ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, impacts would be reduced to less than significance.

Mitigation Measures

16-1 Transportation (Haul Route)

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- (*Non-Hillside*): Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

16-2 Safety Hazards

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

¹⁵⁴LAUSD: http://home.lausd.net/ourpages/auto/2012/3/19/43726930/EducationalServiceCenter_Map_EAST_2012-2013.pdf

¹⁵⁵ *Traffic Analysis for the Proposed Mixed-Use Project Located at 400 South Broadway*, Department of Transportation, September 25, 2013. Included in the Appendices.

- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

16-3 LADOT Project Requirements for Construction Impacts

- A Construction Work Site Traffic Control Plan shall be submitted to the Department of Transportation for review and approval prior to the start of any construction work. The Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Department of Transportation also recommends that all construction related traffic be restricted to off-peak hours.

e) Would the project result in inadequate emergency access?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site.

Project parking would be provided on-site via a multi-level garage, with three access points provided. Vehicular access to the Project Site parking would be provided by way of two full-access driveways and a loading-only driveway. A driveway would intersect the south side of 4th Street, east of Broadway (in the vicinity of the existing Project driveway on 4th Street). A second full-access driveway and the loading-only driveway would intersect the west side of Frank Court, south of 4th Street. No Project access would be provided via Broadway.

The driveways will be designed to comply with Los Angeles Fire Department access requirements. The Project would submit a parking and driveway plan to the Bureau of Engineering and Department of Transportation to ensure compliance (see **Mitigation Measure 16-4**). Therefore, development of the Project will not result in inadequate emergency access to the Project Site or surrounding area. Impacts related to emergency access would be less than significant.

Mitigation Measure

16-4 Inadequate Emergency Access

The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access.

- f) **Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Public Transit

The local CMP requires that all projects consider potential transit impacts. The Project trip generation reflects a transit adjustment of 15 percent for all Project uses, which amounts to 397 net daily transit trips, with 33 AM peak-hour and 37 PM peak-hour transit trips. Per the 2010 CMP guidelines, person transit trips can be estimated by multiplying the transit vehicle trip reductions by a conversion factor of 1.4.

Therefore, the number of Project person transit trips would be approximately 556 daily person transit trips, with 46 AM peak-hour and 52 PM peak-hour person transit trips. Based on recent ridership information provided by the Metro and LADOT, many of the bus and rail lines operating in the Project study area experience ridership levels well below capacity during the AM and PM peak hours.

With a combined eight transit operators operating 54 different bus routes and two rail lines within a convenient walking distance of the Project Site, the local transit system offers substantial available ridership capacity. Therefore, it is expected that the incremental additions of proposed Project person transit trips would not have a significant impact on transit service in the study area.

Bicycles¹⁵⁶

According to the LADOT Bicycle Services, there are currently no bikeways immediately around the Site (Broadway or 4th Street). There are several bikeways within 3 blocks:

- Spring Street Bike Lane: 1.40 miles along Spring Street, from 9th Street to Cesar E. Chavez
- Main Street Bike Lane: 1.40 miles along Main Street, from 9th Street to Cesar E. Chavez
- 2nd Street Bike Route: 0.90 mile along 2nd Street, from Spring Street to Santa Fe Avenue

The 2010 Bike Plan proposes several bicycle facilities around the Project area:

- Hill Street Bike Lane: 1.85 miles along Hill Street, from 4th Street to 23rd Street

¹⁵⁶ LADOT, *Bicycle Services, Maps*: http://www.bicyclela.org/maps_main.htm, June 20, 2013.

- 2nd Street Bike Lane: 1.14 miles along 2nd Street, from Glendale Ave./Beverly Blvd to Main St.

The Project would not impact any of these proposed additions to the bicycle facilities of the City. There is an inverted-U bike parking rack on Broadway near the 4th Street corner. There would be 572 bicycle spaces provided as part of the Project, which is 69 more than required.

Pedestrian Facilities

Construction activities are expected to be fully contained within the Project Site and are not expected to impede access to the sidewalks along Broadway or 4th Street, which is reinforced with **Mitigation Measure 16-5**. Temporary fencing and scaffolding/walkways will be provided to protect pedestrians from the construction site activities.

During operation, the Project would not impact any sidewalks. There are controlled/lighted crosswalks at the intersection of Broadway and 4th Street. There is a controlled/lighted crosswalk midblock on Broadway, between 4th Street and 5th Street, adjacent to the Project Site's boundary with the Judson building. There are no public benches or seating along the sidewalks. Broadway has two newspaper/magazine sidewalk kiosks operated by a person.

The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

Mitigation Measure

16-5 Pedestrian Access During Construction

The applicant shall maintain a clear path of travel for pedestrians along the entire Project Site frontage throughout the duration of construction activities.

17. UTILITIES AND SERVICE SYSTEMS

This section is based on the following letter:

Response from Wastewater Engineering Services Division, August 12, 2013.

a) **Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Less Than Significant Impact. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the "Basin Plan") establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.¹⁵⁷ Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment.¹⁵⁸ Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd.

The Project is required to comply with the monthly allocation set forth by the ordinance, prior to issuance of building permits. The Project will not be able to connect to the City's wastewater system until capacity is available and, therefore, would not cause LABS to exceed LAWQCB treatment requirements.

Further, the HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

¹⁵⁷ *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

¹⁵⁸ *Hyperion Treatment Plant: http://www.lasewers.org/treatment_plants/hyperion/index.htm, June 17, 2013.*

- b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Wastewater Generation, Treatment Facilities, and Existing Infrastructure

As shown on Table 4.17-1, Project Estimated Wastewater Generation, it is estimated the Project will generate a net total of approximately 51,488 gallons per day (gpd) (or 0.051 mgd) of wastewater. This total was reduced by the amount generated by the existing operating use (commercial).

**Table 4.17-1
Project Estimated Wastewater Generation**

Land Use	Size	Average Daily Flow per Type	Total (gpd)
Project			
Residential - Studio	69 units	75 gallons / unit ¹	5,175
Residential – 1-bedroom	224 units	110 gallons / unit ¹	24,640
Residential – 1-bedroom + den	35 units	110 gallons / unit ¹	3,850
Residential – 2-bedroom	121 units	150 gallons / unit ¹	18,150
Residential – Penthouse	1 unit	200 gallons / unit ²	200
Retail	6,904 sf	25 gallons / 1,000 sf ¹	173
Project Subtotal			52,188
Existing			
Commercial	14,000 sf	50 gallons / 1,000 sf ¹	(700)
Net Total			51,488
<p><i>Note: sf = square feet; gpd = gallons per day</i> ¹ Response from Wastewater Engineering Services Division, August 12, 2013. ² Residential 3-bedroom rate; City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</p>			
<p><i>Table: CAJA Environmental Services, January 2014.</i></p>			

The wastewater generated by the Project will be similar to commercial and residential uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system, and thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state’s wastewater

treatment requirements and the Project’s wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

The Project Site will be served by the Los Angeles Bureau of Sanitation, which provides municipal wastewater services to the City. The sewer infrastructure includes:¹⁵⁹

- 12-inch line in Broadway and a 12-inch line in 4th Street.
- Sewage from the 12-inch line in Broadway splits into a 12-inch line in Broadway and 10-inch line in 5th Street. The 12-inch line discharges into a 24-inch line in Hill Street.
- Sewage from the 12-inch line in 4th Street splits into a 36-inch line in Spring Street and 10-inch line in 6th Street.
- Flows from the 10-inch line in 5th Street join flows from the 10-inch line in 5th Street before discharging into 24-inch line in Los Angeles Street, 42-inch line in Los Angeles Street, and 30-inch line in Maple Avenue.

Figure 4.17-1, Sewer Map, shows the details of the sewer system within the vicinity of the Project.

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project’s wastewater flows.

Table 4.17-2, Sewer Line Capacities, shows the current approximate flow level (d/D) and design capacities at d/D of 50% in the sewer system.

**Table 4.17-2
Sewer Line Capacities**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
12	4 th Street	*	614,116 gpd
12	Broadway	*	1.12 mgd
12	Broadway	7	968,056 gpd
10	5 th Street	*	415,790 gpd
24	Hill Street	28	5.12 mgd
36	Spring Street	14	33.73 mgd

¹⁵⁹ Response from Wastewater Engineering Services Division, August 12, 2013. Included in Appendices.

**Table 4.17-2
Sewer Line Capacities**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
10	6th Street	*	783,408 gpd
24	Los Angeles Street	10	4.70 mgd
42	Los Angeles Street	32	17.60 mgd
30	Maple Avenue	26	6.96 mgd

Note: in = inches; d/D = depth/diameter
Source: Response from Wastewater Engineering Services Division, August 12, 2013. Included in Appendices.
Table: CAJA Environmental Services, August 2013.

Initial analysis by the City Wastewater Services Engineering Division indicate that based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for the Project.¹⁶⁰

Further detailed gauging and evaluation will be completed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. This is formally described in **Mitigation Measures 17-1 and 17-2**). Implementation of these prescribed mitigation measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

Wastewater generated by the Project will continue to be conveyed to the HTP. The HTP has a design capacity to treat approximately 450 mgd and currently treats an average daily flow of approximately 362 mgd.¹⁶¹ Thus, a remaining capacity of approximately 88 mgd is sufficient to treat the Project's estimated increase of approximately 0.051 mgd of wastewater.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater. This is formally described in **Mitigation Measure 17-3, 17-4, 17-5 and 17-6**).

¹⁶⁰ Response from Wastewater Engineering Services Division, February 25, 2013.

¹⁶¹ LABS, *Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant*, website: <http://www.lacitysan.org/wastewater/factsfigures.htm>, accessed January 28, 2013.

Therefore, with the mitigation detailed below, impacts to wastewater treatment facilities and existing infrastructure will be less than significant.

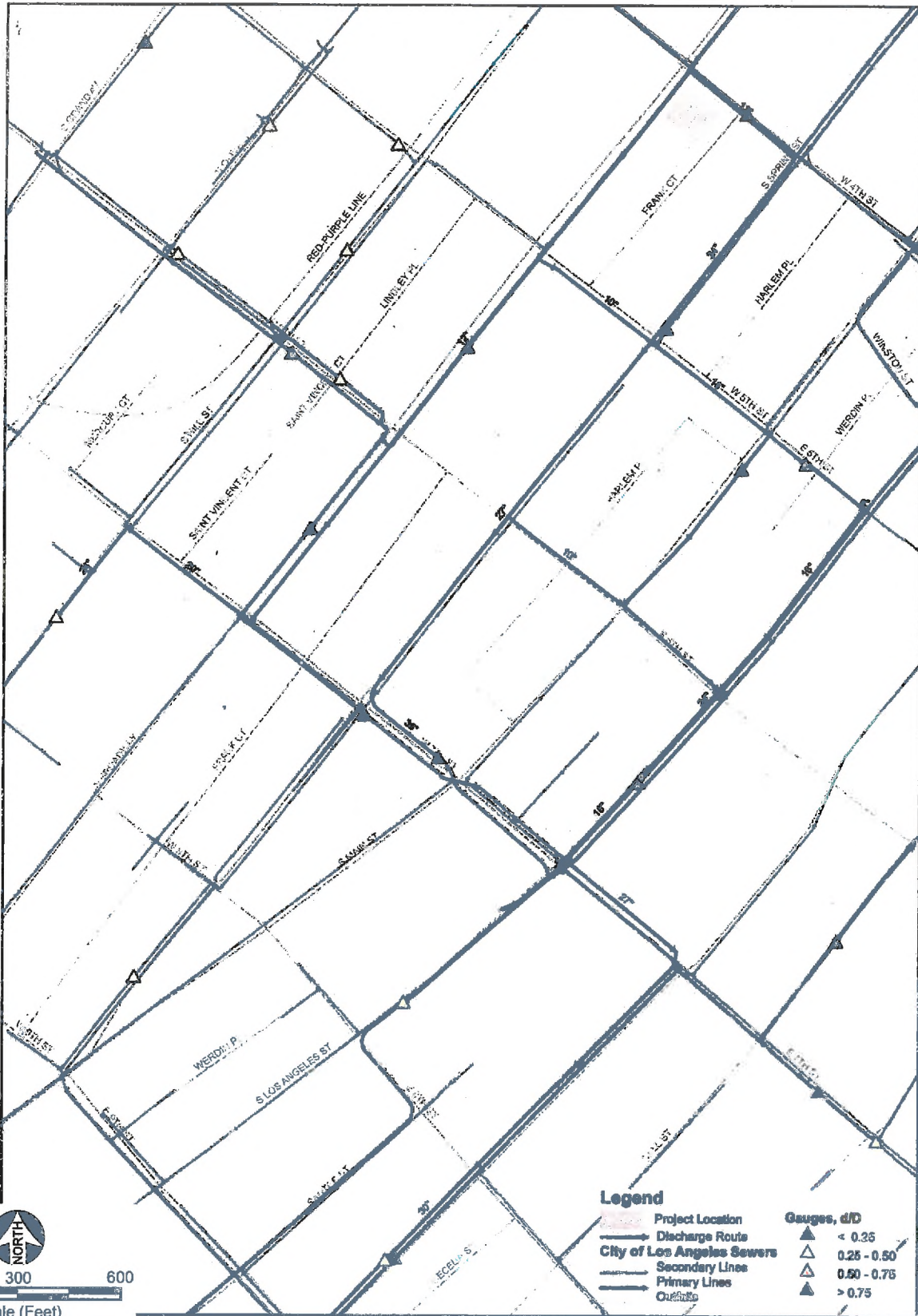
Mitigation Measures

17-1 Utilities (Wastewater – Construction)

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity.

17-2 Utilities (Wastewater)

The Project Applicant shall implement any upgrade to the wastewater system serving the Project Site that is needed to meet municipal requirements.



Water Consumption and Treatment Facilities

The City of Los Angeles Department of Water and Power (LADWP) provide municipal water services to the City and is responsible for providing water to the Project Site.

As shown on Table 4.17-3, Project Estimated Water Consumption, it is estimated the Project will consume a net total of approximately 60,789 gallons per day (gpd) (or 0.061 mgd or 68 acre-feet per year¹⁶²) of water. This total was reduced by the amount consumed by the existing operating use (commercial).

**Table 4.17-3
Project Estimated Water Consumption**

Land Use	Size	Water Consumption Rate	Total (gpd)
Project			
Residential - Studio	69 units	89 gallons / unit	6,141
Residential – 1-bedroom	224 units	130 gallons / unit	29,120
Residential – 1-bedroom + den	35 units	130 gallons / unit	4,550
Residential – 2-bedroom	121 units	177 gallons / unit	21,417
Residential – Penthouse	1 unit	236 gallons / unit	236
Retail	6,904 sf	32 gallons / 1,000 sf	221
Project Subtotal			61,685
Existing			
Commercial	14,000 sf	64 gallons / 1,000 sf ¹	(896)
Net Total			60,789
<p><i>Note: sf = square feet; gpd = gallons per day</i> <i>Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i> <i>Response from Wastewater Engineering Services Division, August 12, 2013. Included in Appendices.</i> <i>Residential 3-bedroom rate; City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i></p> <p><i>Table: CAJA Environmental Services, January 2014.</i></p>			

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP’s Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has

¹⁶² 1 acre foot = 325 851.429 US gallons

between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase of approximately 0.061 mgd represents approximately 0.12 percent and 0.04 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant.

LADWP can generally supply water to development projects within its service area, except under extraordinary circumstances. Additionally, given the incremental increase in water consumption for the Project, and compliance with applicable water conservation ordinance and regulations such as California Code of Regulations (CCR), Title 20, Section 1604; CCR Title 22; City Ordinances 165,004 and 166,080; the Project will not require or result in the construction of new water treatment facilities.

However, as part of the building permit process, the lead agency would confirm that there is sufficient capacity in the water supply and infrastructure to accommodate the Project's water needs. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. Additionally, implementation of **Mitigation Measures 17-3** through **17-6** will ensure that the Project's impacts to the water conveyance system would be less than significant.

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units.

Thus, the Project is not subject to SB 221 as it does not include a residential development of more than 500 dwelling units. The Project includes 450 dwelling units.

Mitigation Measures

17-3 Utilities (Local Water Supplies – Landscaping)

Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:

- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to

irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
 - Weather-based irrigation controller with rain shutoff
 - Matched precipitation (flow) rates for sprinkler heads
 - Drip/microspray/subsurface irrigation where appropriate
 - Minimum irrigation system distribution uniformity of 75 percent
 - Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
 - Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf. and greater.

17-4 Utilities (Local Water Supplies - All New Construction)

Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:

- If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

17-5 Utilities (Local Water Supplies - New Commercial or Industrial)

Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:

- All restroom faucets shall be of a self-closing design.

17-6 Utilities (Local Water Supplies - New Residential)

Environmental impacts may result from project implementation due to the cumulative increase in

demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:

- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the Project Site or if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Stormwater flows southwest along Broadway and southeast along 4th Street. There is a stormwater catch basin at the corner of 4th Street and Broadway. The catch basin connects to a storm drain connector pipe (round, 18-inch diameter, reinforced concrete pipe) under 4th Street. This connects to a main line pipe round, 61-inch diameter, reinforced concrete pipe) that runs parallel under 4th Street¹⁶³

Runoff currently flows toward the existing storm drain system, and development of the Project will not alter the amount of runoff the Project Site. The entire Project Site is covered with impermeable surfaces (hardscape, paving, or the building), and with development of the Project, the Project Site will continue to be covered with impermeable surfaces.

As discussed above, the Project would comply with the City's Low Impact Development (LID) Ordinance, which includes stormwater best management practices. Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC 64.70 (the City's stormwater ordinance) and expanding on the City's existing Standard Urban Stormwater Mitigation Plan

¹⁶³ *Navigate LA, City of Los Angeles, Bureau of Engineering, Storm Drains (Storm Drain Inlets and Storm Pipes) Layer: <http://navigatela.lacity.org/index01.cfm>*

(SUSMP) requirements. LID is different from the previous SUSMP, requiring a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures.

All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. Projects must comply with the LID Best Management Practices (determined on a case-by-case basis by Public Works), and if not feasible, only then do SUSMP BMPs apply.

Thus, no substantial increase in the rate or amount of surface runoff is expected to occur with Project development, and no new stormwater drainage facility will be required to serve the Project. Therefore, no impact will occur.

d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

The Project is projected to use approximately 68 acre-feet per year. The 2010 Urban Water Management Plan ¹⁶⁴projects a supply of 555,477 AFY in 2015.¹⁶⁵ Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand.

Overall, any project that is consistent with the growth projections of the City and region (SCAG) has been taken into account in the planned growth in water demand. Therefore, the Project's water supply needs have already been accommodated within water supply projections for the region and the impact of the Project on water demand is less than significant. In addition, the incorporation of **Mitigation Measures**

¹⁶⁴ Every urban water supplier must submit an Urban Water Management Plan every five years. The next Plan will be in 2015: <http://www.water.ca.gov/urbanwatermanagement/>

¹⁶⁵ 2010 Urban Water Management Plan, Los Angeles, pg. 20: <http://www.ladwp.com/ladwp/cms/ladwp014334.pdf>, August 28, 2013.

17-3 to 17-6, listed above, would further ensure that impacts related to the project's water demand remain less than significant.

- e) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

The Project's generation of 51,488 gallons per day (gpd) (or 0.051 mgd) of wastewater would be more than sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment would be less than significant.

- f) **Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the "Sunshine Canyon Landfill"), with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.¹⁶⁶

According to CalRecycle (California Department of Resources Recycling and Recovery), the Sunshine Canyon Landfill is estimated to close in 2037. It has approximately 112.3 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy, and a maximum permitted daily intake of 12,100 tons per day (tpd).¹⁶⁷

As of June 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).¹⁶⁸ Therefore, the Sunshine Canyon Landfill

¹⁶⁶ City of Los Angeles, *Fact Sheet: Solid Waste Facilities*: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf

¹⁶⁷ State of California Department of Resources Recycling and Recovery, *Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000)*, website: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail>, accessed August 16, 2013.

¹⁶⁸ *Sunshine Canyon Landfill Newsletter, Summer 2013*, website: http://www.sunshinecanyonlandfill.com/home/newsletter/Summer_2013_newsletter.pdf, August 16, 2013

has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged to the maximum extent feasible. Materials not recycled would be disposed of at local landfills.

Demolition of the existing 14,000 square feet use would generate approximately 28 tons of demolition waste. Demolition would take approximately 2 weeks. Therefore, demolition would generate approximately 2.8 tons per day of demolition waste.¹⁶⁹

Construction of the 444,099¹⁷⁰ square feet of new building would generate approximately 973 tons of construction waste.¹⁷¹

Project construction would last approximately 36 months. Therefore, project construction would generate approximately 1.35 tons per day of construction waste.¹⁷²

A majority of the City's construction and demolition waste went to the Puente Hills Landfill.¹⁷³ The Puente Hills Landfill closed on October 31, 2013, when its permit expired. However, there are other County Sanitation Districts' facilities available for disposal and recycling, including the nearby Puente Hills Materials Recovery Facility (MRF) that shares the same entrance as the Landfill. The Puente Hills

¹⁶⁹ 2 weeks x 5 working days per week = 10 working days. 28 tons / 10 days = 2.8 tons per day.

¹⁷⁰ HansonLA, Architects, Entitlement Submittal, January 10, 2014.

¹⁷¹ Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).

¹⁷² 36 months x 20 working days per month = 720 working days. 973 tons / 720 days = 1.35 tons per day.

¹⁷³ City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf

MRF accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.¹⁷⁴

The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.¹⁷⁵ In 2014, the Puente Hills Intermodal Facility will be complete¹⁷⁶ and provide a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.¹⁷⁷ The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.¹⁷⁸ The Mesquite Landfill would have adequate capacity to accept the Project's demolition and construction waste. Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Because of the recycling of most of the solid waste generated by the construction of the Project, short-term construction impacts to landfills and solid waste services will be less than significant. Nonetheless, the following mitigation measures are recommended to further reduce the Project's already less than significant impacts (see **Mitigation Measures 17-7** and **17-8**).

Mitigation Measures

17-7 Utilities (Solid Waste Recycling)

Environmental impacts may result from project implementation due to the creation of additional solid waste. However, this potential impact will be mitigated to a less than significant level by the following measure:

- (*Operational*) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- (*Construction/Demolition*) Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.

¹⁷⁴ County Sanitation Districts, Puente Hills Landfill Closing on October 31, 2013: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>, accessed October 16, 2013.

¹⁷⁵ County Sanitation Districts, Puente Hills MRF Fact Sheet: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>, accessed October 16, 2013.

¹⁷⁶ County Sanitation Districts, Waste-By-Rail: <http://www.lacsd.org/solidwaste/wbr/default.asp>, October 16, 2013.

¹⁷⁷ Puente Hills Landfill: <http://www.lacsd.org/civica/filebank/blobload.asp?BlobID=3708>, October 16, 2013.

¹⁷⁸ Mesquite Regional Landfill: <http://www.mrlf.org/index.php?pid=5>

17-8 Utilities (Solid Waste Disposal)

All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

Operation

As shown on Table 4.17-4, Project Estimated Solid Waste Generation, it is estimated the Project will generate a net total of approximately 5,469 pounds (2.73 tons) of solid waste per day. This total was reduced by the amount generated by the existing operating use (commercial).

**Table 4.17-4
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rate	Total (lbs)
Project			
Residential	450 units	12.23 lbs / unit	5,504
Retail	6,904 sf	5 lbs / 1,000 sf	35
Project Subtotal			5,539
Existing			
Commercial	14,000 sf	5 lbs / 1,000 sf	(70)
Net Total			5,469
<p><i>Note: sf = square feet; lbs = pounds</i> <i>Rates: CalRecycle Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/</i> <i>Residential: City of Los Angeles CEQA Threshold Guide, 2006.</i> <i>Commercial/Retail: EIR cites City of LA Dept. of City Planning doc "EIR Manual for Private Projects" as source</i></p> <p><i>Table: CAJA Environmental Services, August 2013.</i></p>			

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 2.73 tpd increase in solid waste resulting from the Project.

Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The City achieved a 72 percent diversion rate of solid waste from landfills (fiscal year 2011-12), exceeding the required

50 percent diversion rate required by AB 939. The City is on track to achieving 75 percent recycling and diversion rate in 2013 ¹⁷⁹

Mitigation Measure 17-7, above, would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations. Therefore, the impact associated with solid waste during operation of the Project will be less than significant.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Management Policy Plan, which is the long-range solid waste management policy plan for the City, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project will also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials; and implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Waste generated by the Project will not alter the projected timeline for landfills within the region to reach capacity. The Project will comply with federal, state, and local regulations, and impacts would be less than significant.

¹⁷⁹ City of Los Angeles, Department of Public Works, Year at a Glance, 2011-12: http://lacitysan.org/general_info/pdfs/BOS_YAG_11_12_FINAL.pdf, accessed August 16, 2013.

18. MANDATORY FINDINGS OF SIGNIFICANCE

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues.

The Project is located in a densely populated urban area and would have less than significant impacts with respect to biological and cultural resources. The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the IS/MND.

The locations of the 44 related projects included in this analysis are shown in Figure 4.16-11, Related Project Location Map. The related project locations, descriptions, and trip generation estimates are listed in Table 4.16-7, Related Project Locations, Descriptions, and Trip Generations. All the related projects are located in the City of Los Angeles.

The nearest related project to the Project Site is:

- No. 44 – apartment, office, and retail mixed-use project (across 4th Street at 348 Broadway)

This related project will also add residential, dwelling unit, and employee population to the same localized areas as the Project. However, as with this Project, the related project would be required to pay fees, conduct its own feasibility studies related to infrastructure, and be subject to other City and code-required measures to ensure that public services and utilities would be adequate. In addition, the traffic

consultant who prepared the project's Memorandum of Understanding (MOU) with LADOT in May 2013, has indicated that as of September 2013, the project is on hold.

The Project and related projects are anticipated to comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding geology and soils, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic.

These resource areas (geology and soils, cultural resources, hazards and hazardous materials, and hydrology) are site specific so that each related project would need to be evaluated within its own site-specific context.

The Project will not result in significant traffic impacts at any of the 10 study intersections analyzed under Future (2017) With Project, which takes into account the related projects, plus ambient traffic growth.

Regarding aesthetics and land use, compliance with City of Los Angeles design and land use standards and the mitigation measures contained within this IS/MND would ensure that any cumulative impacts related to aesthetics and land use would be less than significant.

Further, related projects would be individually evaluated for consistency with applicable land use standards. Aesthetics is a subjective resource area in which each project must be analyzed within its own local setting to determine whether visual character of a site is affected. In addition, the Project will not combine with other related projects to block significant viewsheds in the project vicinity.

Any increase in area population from the increase of on-site employees and/or residents resulting from the Project and the related projects are anticipated to be within regional and local forecasts.

Demands on public services such as fire protection, police protection, schools, parks and recreational facilities, and libraries resulting from the Project will be less than significant with implementation of Code requirements and mitigation measures (where applicable). These Code requirements and mitigation measures identified for the Project are standard Code requirements/mitigation measures from the City that would also apply to the related projects in the City of Los Angeles.

Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project will be less than significant with implementation of provided mitigation measures, where applicable. These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects.

The 43 other related projects are at least two blocks away or more, distances ensure that any other localized impacts of the related project would not combine with the Project.

Therefore, the Project's incremental contribution to cumulative impacts will be less than significant.

- c) **Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections.

As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

