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CITY OF LOS ANGELES
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LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS

DIR-2021-9334-SPP-SPPA, VTT-83538, ZA-2022-8898-ZAI

LEAD CITY AGENCY

City of Los Angeles (Department of City Planning)

CASE NUMBER

ENV-2021-9335-CE

PROJECT TITLE

Residences at 333 South Hope Street

COUNCIL DISTRICT

14 - de León

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map)

333 S. Hope Street, Los Angeles, CA 90071

☐ Map attached.

PROJECT DESCRIPTION:

☐ Additional page(s) attached.

The proposed project is a 34-story multi-family residential structure containing 366 dwelling units on the southeastern portion of an approximately 183,524 square-foot (4.21 acre) site. The building will contain 309,160 square feet of floor area, 187 vehicular parking spaces provided within the existing subterranean parking levels, and a total of 187 bicycle parking spaces. The project will provide 27,809 square feet of usable open space. There are a total of 106 trees within the project site and 30 trees located within the right-of-way adjacent to the project site, none of which are considered protected. The project proposes removing 20 on-site trees and seven street trees. Seven new trees will be planted within the development area and street trees will be replaced a 2:1 ratio. The proposed project will export 10,500 cubic yards of earth.

NAME OF APPLICANT / OWNER:

333 South Hope Co., LLC (Applicant/Owner)

CONTACT PERSON (If different from Applicant/Owner above)

James Pugh, Sheppard Mullin Richter & Hampton LLP

(AREA CODE) TELEPHONE NUMBER

(213) 617-4284

EXT.

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)

STATE CEQA STATUTE & GUIDELINES

☐ **STATUTORY EXEMPTION(S)**

Public Resources Code Section(s) _____

☒ **CATEGORICAL EXEMPTION(S)** (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)

CEQA Guideline Section(s) / Class(es) **Section 15332 / Class 32**

☐ **OTHER BASIS FOR EXEMPTION** (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

JUSTIFICATION FOR PROJECT EXEMPTION:

☐ Additional page(s) attached

See the attached justification.

☒ None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.

☐ The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.

If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE

Sophia Kim

Sophia Kim

STAFF TITLE

City Planner

ENTITLEMENTS APPROVED

Project Permit Compliance Review, Project Permit Adjustment, Vesting Tentative Tract, Zoning Administrator's Interpretation

DISTRIBUTION: County Clerk, Agency Record

Rev. 6-22-2021



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Categorical Exemption

Justification for Categorical Exemption The Residences at 333 South Hope Street Project

Case Number: ENV-2021-9335-CE

The Los Angeles Department of City Planning determined that The Residences at 333 South Hope Street Project (Project) is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Statute and Guidelines, Article 19, Section 15332 Class 32 (In-Fill Development Projects), and there is no substantial evidence demonstrating that an exception to a Categorical Exemption pursuant to State CEQA Statute and Guidelines, Section 15300.2, applies.

Project Location: 333 South Hope Street, Los Angeles, CA 90071

Community Plan Area: Central City

Council District: 14—de León

Project Description: The Residences at 333 South Hope Street Project (Project) proposes the development of a new 34-story multi-family residential structure on an approximately 183,524-square-foot (4.21-acre) site located at 333 South Hope Street (Project Site) in the Central City Community Plan area of the City of Los Angeles (City). The Project would include 366 multi-family residential units with associated amenities and a ground floor café, with a total proposed new floor area of 309,160 square feet. The Project's proposed uses would be supported by 187 dedicated vehicle parking spaces located in an existing subterranean parking structure located on the Project Site, and 189 new bicycle parking spaces, including 169 long-term spaces and 20 short-term spaces. The Project would also include approximately 27,809 square feet of open space and recreational amenities and a redeveloped 5,097-square-foot pedestrian plaza area. A portion of the Project Site is currently occupied by a 55-story office tower containing approximately 1,331,394 square feet of floor area located in the northeastern portion of the Project Site, a landscaped plaza located in the southwestern portion of the Project Site, and a subterranean parking structure that underlies most of the Project Site. The existing office tower, nearly all of the parking structure and approximately 89 percent of the landscaped plaza would be retained. The new residential tower would occupy a corner within the southernmost portion of the Project Site (Development Area), which currently consists of landscaped open space at grade and a parking structure below grade. The Project would require the removal of 20 non-native/non-protected trees within the southern portion of the Development Area and seven City right-of-way street trees located along Hope Street adjacent to the Development Area. On the Concourse Level, the Project results in the conversion of 22,052 square feet of existing space defined as floor area by Section 12.03 of the LAMC (office) into space not defined as floor area by Section 12.03 of the LAMC (basement storage, mechanical, circulation, trash and recycling areas). The 22,052 square feet is being used throughout the new tower, resulting in a maximum of 310,658 square feet of available floor area for new construction on the Development Area. Therefore, the Project would result in approximately 1,618,502 square feet of floor area on the entire Project Site. Construction would require approximately 10,500 cubic yards of soil export.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

333 South Hope Co, LLC

December 2023

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1 INTRODUCTION

An application for the proposed The Residences at 333 South Hope Street Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that, pursuant to the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Section 15300), the Project is in a class of projects that do not have a significant effect on the environment and that are, therefore, declared to be categorically exempt from CEQA and, thus, from the requirements for preparation of environmental documents. Pursuant to CEQA Guidelines Section 15332 (Class 32), the Project is exempt as an infill development project that meets the conditions described in CEQA Guidelines Section 15332(a) through Section 15332(e). In addition, there is no substantial evidence, or other evidence in the administrative record demonstrating that an exception pursuant to CEQA Guidelines Section 15300.2 is applicable. If a project is subject to a Categorical Exemption, no formal environmental evaluation is required, and the categorically exempt project is not otherwise subject to CEQA. Thus, the intent of this document is to inform the decision-makers and the public, provide evidence for the administrative record, and demonstrate how the Project qualifies for a Class 32 Categorical Exemption.

1.1 REGULATORY SETTING

CEQA requires the Secretary of the Natural Resources Agency to designate in the CEQA Guidelines classes of projects that the Secretary has found do not have a significant effect on the environment and that are exempt from CEQA. Public Resources Code, Section 21084(a); 14 California Code of Regulations Section 15300. By statute, CEQA does not apply to the classes of projects that the Secretary has designated as exempt. Public Resources Code, Section 21080(b)(9). These exemptions are generally referred to as “categorical exemptions.” See CEQA Guidelines, Section 15354. If a project is subject to a categorical exemption, no formal environmental evaluation is required, and the agency need not consider alternatives or mitigation measures for a project determined to be categorically exempt. A project that is categorically exempt may be implemented without any CEQA compliance whatsoever as a matter of law. As the Lead Agency for the Project, the City has the discretion to support its determination that the Project is categorically exempt with substantial evidence.

Public Resources Code Section 21084 requires that the CEQA Guidelines include a list of classes of projects that do not have a significant effect on the environment and are, thus, declared to be categorically exempt from the requirements of CEQA. Accordingly, the Secretary of the Natural Resources Agency has designated classes of projects that are generally referred to as “categorical exemptions.” The City of Los Angeles, as the Lead Agency for the Project, has determined that the Project would qualify for a Class 32 Infill Development Project Categorical Exemption. CEQA Guidelines Section 15332 establishes that projects characterized as in-fill development are exempt from CEQA if the project meets the following conditions, which are discussed in Section 3.2 below:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations;*

- (b) *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban use;*
- (c) *The project site has no value as habitat for endangered, rare or threatened species;*
- (d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and*
- (e) *The site can be adequately served by all required utilities and public services.*

In addition, CEQA Guidelines Section 15300.2 includes a list of exceptions to the categorical exemptions. A determination by the Lead Agency that a project is categorically exempt constitutes an implied finding that none of the exceptions to the exemptions apply. However, in order to provide a conservative analysis, a discussion of the following exemptions is provided in Section 3.3 below for the administrative record:

- (a) *Location: Classes 3, 4, 5, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment to be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
- (b) *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
- (c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) *Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
- (e) *Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) *Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

2 PROJECT DESCRIPTION

2.1 PROJECT SUMMARY

The Residences at 333 South Hope Street Project (Project) proposes the development of a new 34-story multi-family residential structure on an approximately 183,524-square-foot (4.21-acre) site located at 333 South Hope Street (Project Site) in the Central City Community Plan area of the City of Los Angeles (City). The Project would include 366 multi-family residential units with associated amenities and a ground floor café, with a total proposed new floor area of 309,160 square feet. The Project's proposed uses would be supported by 187 dedicated vehicle parking spaces located in an existing subterranean parking structure located on the Project Site, and 189 new bicycle parking spaces, including 169 long-term spaces and 20 short-term spaces. The Project would also include approximately 27,809 square feet of open space and recreational amenities and a redeveloped 5,097-square-foot pedestrian plaza area. The Project Site is currently occupied by a 55-story office tower containing approximately 1,331,394 square feet of floor area located in the northeastern portion of the Project Site, a landscaped plaza located in the southwestern portion of the Project Site, and a subterranean parking structure that underlies most of the Project Site. The office tower, nearly all of the parking structure, and approximately 89 percent of the landscaped plaza would be retained. The new residential tower would occupy a corner within the southernmost portion of the Project Site (Development Area) which currently consists of landscaped open space at grade and a parking structure below grade. On the Concourse Level, the Project results in the conversion of 22,052 square-feet of existing space defined as floor area by Section 12.03 of the LAMC (office) into space not defined as floor area by Section 12.03 of the LAMC (basement storage, mechanical, circulation, trash and recycling areas). The 22,052 square feet is being used throughout the new tower, resulting in a maximum of 310,658 square feet of available floor area for new construction on the Development Area. Therefore, the Project would result in approximately 1,618,502 square feet of floor area on the entire Project Site.¹ Approximately 10,500 cubic yards of soil would be exported.

2.2 ENVIRONMENTAL SETTING

2.2.1 Project Location

As shown in Figure 1 and Figure 2 on pages 4 and 5, the Project Site is located at 333 South Hope Street within the Central City Community Plan (Community Plan) area and Bunker Hill Specific Plan (Specific Plan) area of Downtown Los Angeles, approximately 14 miles east of the Pacific Ocean. The Project Site is located within a Transit Priority Area, the Greater Downtown Housing Incentive Area, and the former Los Angeles State Enterprise Zone. The Project Site comprises an entire City block bounded by Hope Street to the southeast, 4th street to the southwest, Flower Street to the northwest, and 3rd Street to the northeast. Primary regional access to the Project Site is provided by the Harbor Freeway (State Route [SR] 110), located approximately 0.2 mile northwest of the Project

¹ Section 12.03 of the LAMC defines "Floor Area" as "the area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and Basement storage areas."



Figure 1
Project Location Map

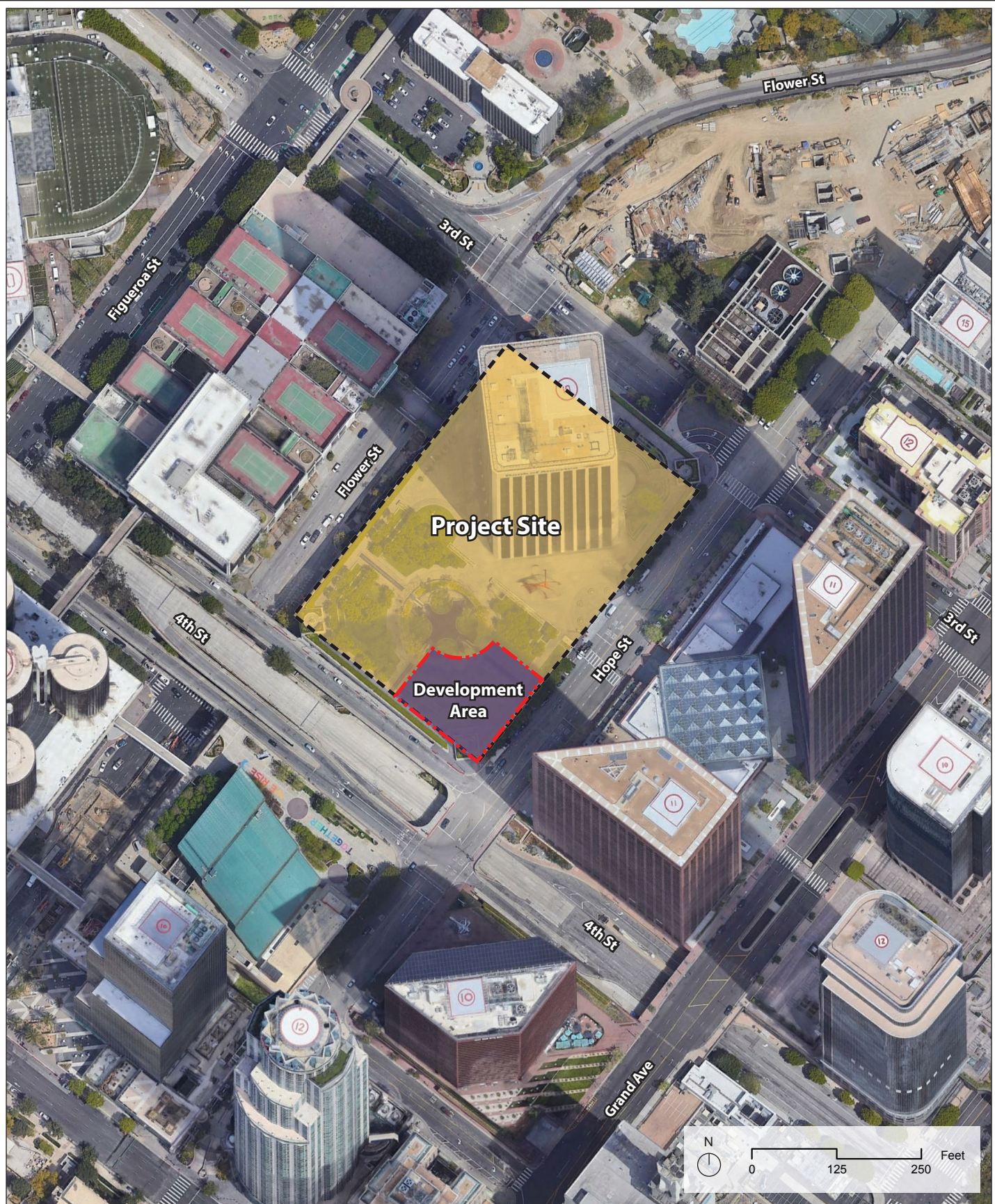


Figure 2
Aerial Photograph of the Project Site and Vicinity

Site, and the Hollywood Freeway (US-101), located approximately 0.5 mile northeast of the Project Site. Local vehicular access to the Project Site is provided by Flower Street, Hope Street, 3rd Street, and the eastbound and westbound ramps that lead to 4th Street.

More specifically, as shown in Figure 2 on page 5, the Development Area is a relatively small portion of the Project Site, consisting of 24,274 square feet in the southern portion of the Project Site. The new residential tower would be sited in approximately one quadrant of the existing landscaped plaza area, located adjacent to the corner of Hope Street and 4th Street. The Development Area, which represents the limits of physical disturbance on the Project Site, comprises approximately 13 percent of the overall Project Site. The Project was designed to site the new residential tower in this manner to complement the existing uses on the Project Site and minimize disturbance to the existing landscaped plaza.

2.2.2 Existing Conditions

The 4.21-acre Project Site, commonly known as the Bank of America Plaza, is currently occupied by a high-rise office tower located in the northeastern portion of the Project Site; an outdoor plaza located in the southwestern portion of the Project Site, which includes the Development Area; and a parking structure that is located beneath most of the Project Site. The existing 55-story office building includes approximately 1,331,394 square feet of floor area. The existing office building is surrounded by paved surfaces with terraced areas, raised planters, perimeter landscaping, and public art. A landscaped plaza is located adjacent to the office building on the southwest. This plaza includes pedestrian walkways, a series of water features, lawn areas, and terraced planters. The subterranean parking structure, which encompasses most of the Project Site, consists of approximately 2,185 parking spaces located within 8 to 11 subterranean (or partially subterranean) parking levels, extending to depths from 50 to 136 feet below the surrounding street elevations.² The parking structure includes a podium on which the existing office tower and plaza are situated. Vehicular access to the Project Site is provided via driveways along Hope Street (at the upper terminus of 3rd Street) and Flower Street, with service and truck access provided via a driveway along 4th Street. Pedestrian access to the Project Site is generally provided via a sidewalk along Hope Street, with a terraced entry to the office tower located toward the center of the block and an additional pedestrian access point to the plaza located near the corner of Hope Street and 4th Street. In addition, there is a publicly accessible pedestrian linkage over Flower Street that extends from the Concourse Level of the existing office tower to the World Trade Center Building located west of the Project Site.

Landscaping within the Project Site includes manicured areas of various plants, trees, and water and hardscape features. The existing office tower includes an entry plaza on the southeast side of the building adjacent to Hope Street that contains raised planters, terraced areas, and Alexander Calder's "*Four Arches*" sculpture. Additional landscaping and ornamental pools are located on the east and north sides of the building. The plaza includes manicured lawn area with trees, shrubs, and raised and terraced planters, and is centered around a circular, sunken water feature with three additional narrow ornamental pools that connect to the main feature via waterfalls. Surrounding the central fountain are four distinct and relatively uniform landscaped areas. These areas include grass cover with trees and shrubs, as well as some terracing details. Another public art piece (Woods Daly's

² Due to the topography of the Project Site, some of the "subterranean" parking levels are above-grade at Flower Street.

“Sierra Leone”) is located in the northernmost of these quadrants. The Development Area is located within the southernmost of these quadrants. Perimeter landscaping, including hedges and trees, extend along the podium level surrounding the entire Project Site. There are a total of 106 trees within the Project Site and 30 street trees located with the City of Los Angeles right-of-way adjacent to the Project Site.³ None of the on-site and City right-of-way trees are considered protected trees pursuant to the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Protected Tree and Shrub Ordinance).⁴

The topography of the Project Site descends to the northwest from Hope Street, with an approximate high elevation of 374.40 feet above Mean Sea Level (MSL), to Flower Street, with an approximate low elevation of 310.35 feet above MSL. The elevation differential between Hope Street and Flower Street is approximately 64.05 feet.

As previously noted, the Project Site is located within the Central City Community Plan area and the Bunker Hill Specific Plan Specific Plan area. The Project Site has a General Plan land use designation of Regional Center Commercial and is zoned C4-4D (Commercial Zone, Height District 4 with Development Limitations). Pursuant to the Los Angeles Municipal Code (LAMC), the C4-4D Zone permits a wide array of commercial land uses including retail, office, hotels, schools, and parks, as well as any land uses permitted in the R4 (Multiple Residential) Zone, which includes one- and two-family dwelling units and apartment buildings. Height District 4 within the C4 zone does not impose any height limits but restricts development to a maximum FAR of 13:1. The zoning contains a “D” limitation for 6:1 FAR. Importantly, the limitation contains a grandfathering clause that allows increased floor area for sites with an approved Disposition and Development Agreement or Owner-Participation Agreement with the Community Redevelopment Agency/Los Angeles (“CRA/LA”), which applies to the Project Site. The City has confirmed the applicability of the grandfathered FAR rights and confirmed that the Project Site retains 288,606 square feet of floor area for future development.

Also, the “D” limitation is superseded by the Bunker Hill Specific Plan’s FAR allowance for the Project Site. As noted in Section 3 of the Specific Plan, whenever the Specific Plan contains provisions that are different from what is allowed pursuant to the provisions in the LAMC, the Specific Plan shall supersede the applicable provisions of the LAMC.

Pursuant to the Specific Plan, previous development capacities outlined in the former Bunker Hill Redevelopment Plan area remain in effect.⁵ The resulting floor area rights are included in Appendix A of the Specific Plan. Accordingly, Parcel I, which encompasses the Project Site, is allocated

³ Carlberg Associates, City of Los Angeles Tree Inventory Report—333 South Hope Street, Los Angeles, California 90071, June 21, 2021.

⁴ The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, updated February 4, 2021) applies to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species as well as Mexican Elderberry and Toyon shrub species that are native to Southern California, and excludes trees or shrubs grown or held for sale by a licensed nursery or trees planted or grown as part of a tree planting program.

⁵ The Project Site is within the boundaries of the former Community Redevelopment Agency (CRA) Bunker Hill Urban Renewal Project (also known as the Bunker Hill Redevelopment Project) and is subject to a CRA Redevelopment Plan. The CRA Redevelopment Plan identified the Project Site as Bunker Hill Parcel I. The City adopted the Bunker Hill Specific Plan in 2013, which replaced the regulations of the CRA Redevelopment Plan.

1,620,000 square feet for development rights. The Specific Plan does not limit the maximum number of dwelling units on the Project Site. The Project Site is also within a Transit Priority Area (TPA) as defined by Senate Bill (SB) 743,⁶ the Greater Downtown Housing Incentive Area, and the former Los Angeles State Enterprise Zone.

The Project Site is served by a variety of public transit options provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). The Project Site is located approximately 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station, both of which serve the Metro B (formerly known as Red) and D (formerly known as Purple) lines. The Project Site is also served by numerous transit lines primarily along Flower Street, Hope Street, Figueroa Street, Grand Avenue, and 5th Street that are operated by Metro, LADOT Downtown Area Short Hop (DASH), LADOT Commuter Express (CE), Foothill Transit, Antelope Valley Transit Authority (AVTA), Torrance Transit, Orange County Transportation Authority (OCTA), Santa Monica Big Blue Bus (BBB), and Montebello Bus Lines. The recently constructed Metro regional connector is located adjacent to the Project Site.

2.2.3 Surrounding Land Uses

The Project Site is located in the Bunker Hill neighborhood, which is characterized by a variety of dense urban uses including high-rise buildings containing residential, office, and hotel uses with a variety of ground-floor commercial uses, as well as museum and cultural facilities. To the northeast of the Project Site are residential towers and cultural institutions, including the Broad Museum, Museum of Contemporary Arts, and Walt Disney Concert Hall. To the northwest of the Project Site are commercial/office uses, hotel, and residential uses, including the World Trade Center Building located west of the Project Site across Flower Street. Farther to the northwest is SR-110. To the southeast of the Project Site are office towers and hotel uses. To the southwest of the Project Site are the Ketchum-Downtown YMCA, office towers, and hotel uses, with the Los Angeles Central Library and Bunker Hill Steps located farther to the southwest. The uses surrounding the Project Site are primarily designated for Regional Center Commercial land uses, with interspersed properties designated for residential and public facilities uses primarily located to the north and east of the Project Site.

2.3 DESCRIPTION OF PROJECT

2.3.1 Project Overview

As discussed above and summarized in Table 1 on page 9, the Project consists of a 34-story residential tower that would include up to 366 residential units. The Project would include a total of 309,160 square feet of floor area, including 7,726 square feet of residential amenity uses, a

⁶ Public Resources Code (PRC) Section 21099 defines a TPA as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines a major transit stop as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

Table 1
Summary of Proposed Floor Area^a

Land Use	Proposed Development
Residential—Apartments	293,082 sf (366 du)
Residential—Amenity	7,726 sf
Residential—Leasing	2,054 sf
Residential—Lobby/Amenity	2,305 sf
Residential—Elevator Lobby/Stair Vestibule	3,568 sf
Residential Subtotal	308,735 sf
Commercial (café)	425 sf
Total Proposed	309,160 sf
Existing Floor Area	1,331,394 sf
Removed Floor Area ^b	(22,052 sf)
Total Project Site (Existing and Proposed)	1,618,502 sf
<i>du = dwelling units</i> <i>sf = square feet</i> ^a Square footage is calculated pursuant to the LAMC definition of floor area. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.” ^b As part of the Project, 22,052 square feet of existing office space (defined as Floor Area by the LAMC) on the Concourse Level would be converted to basement storage, mechanical, circulation, trash, and recycling areas (not defined as Floor Area by the LAMC). Source: Large Architecture and Eyestone Environmental, 2022.	

2,054-square-foot leasing and amenity area, a 2,305-square-foot lobby, 3,518 square feet of addition residential lobby/vestibule and back of house uses; and a 425-square-foot café with a 212-square-foot outdoor seating area at the Plaza Level. The Project would also include approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck, as well as a redeveloped 5,097-square-foot pedestrian plaza. The proposed building would reach a maximum height of 420 feet 7 inches, as measured to the highest building element, per LAMC Section 12.03. Parking for the proposed uses would be provided in the existing subterranean parking structure that underlies the Project Site. In accordance with the LAMC and the Specific Plan, the Project would provide 187 dedicated vehicular parking spaces on designated levels within the parking structure. In addition, the Project would provide 189 bicycle parking spaces, including 169 long-term spaces and 20 short-term spaces. A conceptual site plan of the Project is included as Figure 3 on page 10, and Project elevations are shown in Figure 4 and Figure 5 on pages 11 and 12.

As part of construction of the Project, approximately 10,500 cubic yards of soil would be exported.

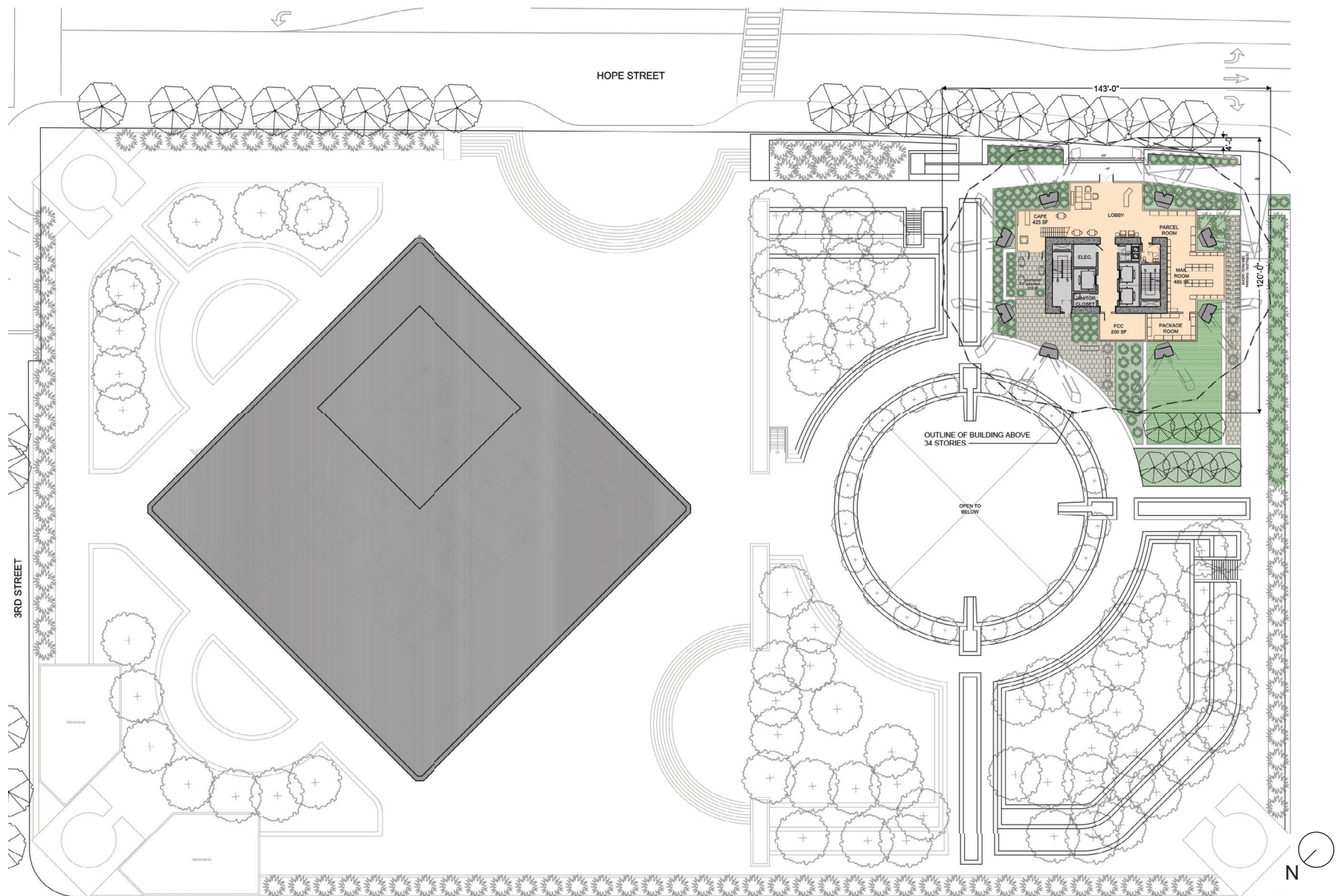
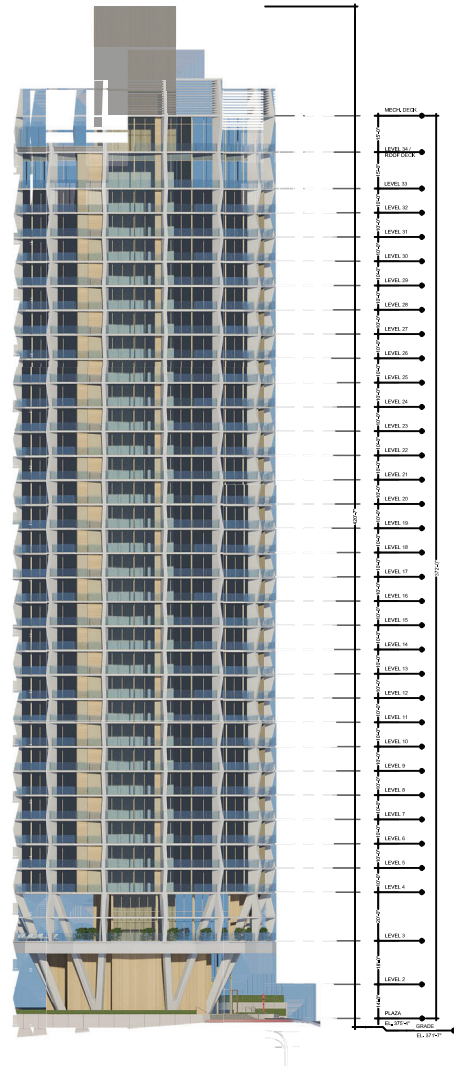


Figure 3
Conceptual Site Plan

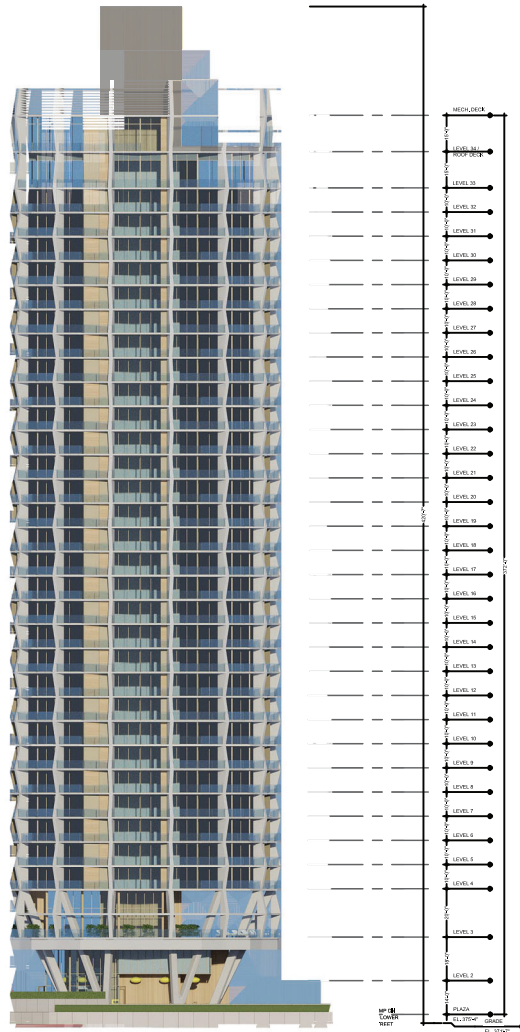


02 BUILDING ELEVATION - SOUTH

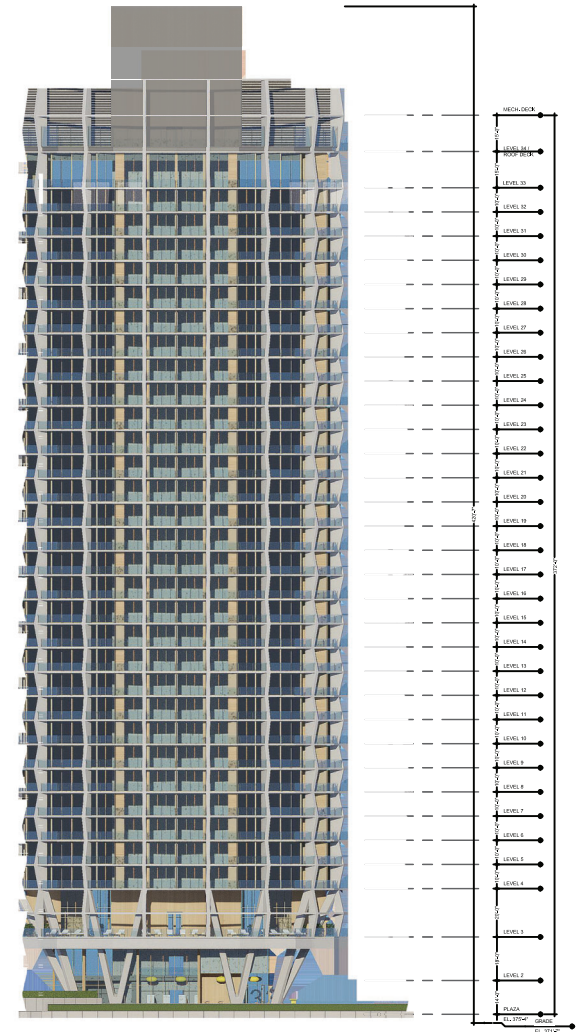


01 BUILDING ELEVATION - EAST

Figure 4
Building Elevations – South and East



02 BUILDING ELEVATION - NORTH



01 BUILDING ELEVATION - WEST

Figure 5
Building Elevations – North and West

The Project Site is zoned C4-4D, which permits a wide array of commercial land uses and any land uses permitted in the R4 Zone, which includes apartment buildings. As previously noted, the Specific Plan does not impose a limit on the number of dwelling units permitted on the Project Site. Thus, the 366 residential dwelling units proposed by the Project would not exceed any density limits in place for the Project Site. Similarly, Height District 4 within the C4 zone does not impose any height limits. Therefore, the Project's proposed maximum height of 420 feet, 7 inches would not exceed any prescribed height limits. On the Concourse Level, the Project results in the conversion of 22,052 square feet of existing space defined as floor area by Section 12.03 of the LAMC (office) into space not defined as floor area by Section 12.03 of the LAMC (basement storage, mechanical, circulation, trash and recycling areas). The 22,052 square feet is being used throughout the new tower, resulting in a maximum of 310,658 square feet of available floor area for new construction on the Development Area. The Project Site is allocated 1,620,000 square feet of floor area pursuant to previous development capacities outlined in the former Bunker Hill Redevelopment Plan, as described further below.

Thus, the Project's addition of 309,160 square feet to the Project Site would result in a total floor area of 1,618,502 square feet, which is within the maximum floor area limits allocated to the Project Site in Appendix A of the Specific Plan, and thus, would be within the limits set forth by the Specific Plan.⁷

2.3.2 Design and Architecture

The Project would be designed to complement the surrounding architecture while contributing a unique building to the rich urban fabric and skyline of the Bunker Hill neighborhood, which is characterized by an eclectic mix of buildings and architectural styles. The siting of the proposed building in the southern portion of the Project Site adjacent to the corner of Hope Street and 4th Street would allow for the retention of the vast majority of the existing plaza (including the central water feature), while providing a natural separation between the proposed residential uses and the existing office building and other surrounding towers.

The building has been intentionally sited to create the smallest impact to the existing landscape design and overall function of the Project Site. As illustrated in the renderings of the Project included in Figure 6 on page 14, the residential tower would consist of a cylindrical design that would rest on a minimal lobby program at the Plaza Level, from where V-shaped beams that would support the building would extend out from the building to the landscaped quadrant. This would provide an openness at the Plaza Level and in the lobby of the building. The beams would extend up and outward through the Level 3 amenity deck. Floor to ceiling windows would extend from the lobby to the top of Level 3. The façade of the structure would be punctuated by a symmetrical pattern of horizontal and vertical elements that would wrap around the building and would provide a high degree of articulation while creating space for and separation between private residential balconies. These would include window walls and glass infills, slabs and fins, and glass balustrades. Building materials

⁷ The Project Site currently contains 1,331,394 square feet of floor area and has an allowable permitted floor area of 1,620,000 square feet. Thus, when accounting for the conversion of 22,052 square feet of existing floor area to area that is not defined as floor area by the LAMC and the remaining unused floor area, the total available floor area within the Project Site would be 310,658 square feet. As such, the total proposed floor area of 309,160 square feet would be less than the total available floor area within the Project Site when accounting for the reallocation of existing office floor area to area to circulation area.



VIEW FROM PLAZA LOOKING SOUTH-EAST



VIEW FROM PLAZA LOOKING SOUTH



VIEW AT PLAZA LOOKING EAST



VIEW AT HOPE STREET LOOKING SOUTH



VIEW FROM PLAZA LOOKING SOUTH-WEST



VIEW AT HOPE STREET LOOKING WEST

Figure 6
Project Renderings

would consist of glass, wood accents including soffits and wall panels on the lower levels, and white concrete finishes. Rooftop mechanical equipment would be screened by architectural louvres.

2.3.3 Open Space and Landscaping

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site. In compliance with the requirements of the Bunker Hill Specific Plan, the Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the plaza, and interior meeting rooms and lounge areas. As previously discussed, approximately 89 percent of the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped the lawn areas.

The Project would require the removal of some of the existing landscaping on the Project Site, including 20 non-native/non-protected trees within the southern portion of the Development Area. In addition, seven City right-of-way street trees, located along Hope Street adjacent to the Development Area, would have to be removed to accommodate Project development.⁸ The Project would preserve approximately 89 percent of the existing plaza on the Project Site and would incorporate improvements to provide a seamless transition from the residential lobby area to the plaza. New landscaping for the Project would continue the general pattern of the existing plaza and would include hedges along portions of 4th Street Hope Street, terraced planters, and lawn areas. Approximately seven new trees would be planted within the Development Area and street trees would be replaced at a 2:1 ratio in accordance with the requirements set forth by the Los Angeles Bureau of Street Services, Urban Forestry Division. The conceptual landscape for the Plaza Level is shown in Figure 7 on page 16.

2.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via existing driveways along Flower Street and Hope Street. Service vehicles and delivery trucks would access the Project Site via the existing driveway along 4th Street. This access point would be widened to accommodate one additional lane for egress. Internal modification would be made to the existing parking structure to accommodate circulation, as necessary.

As previously noted, the proposed residential uses would be supported by 187 vehicle parking spaces that would be dedicated for use by the residents of the Project. These spaces would be provided on Levels E, F, and G, which would be accessed from the existing entry/exit ramp on Flower Street. The

⁸ As discussed in the Tree Inventory Report included as Appendix A of this document, the cantilever created by Level 3, at approximately 28 feet above grade, would preclude the preservation of the City right-of-way trees.

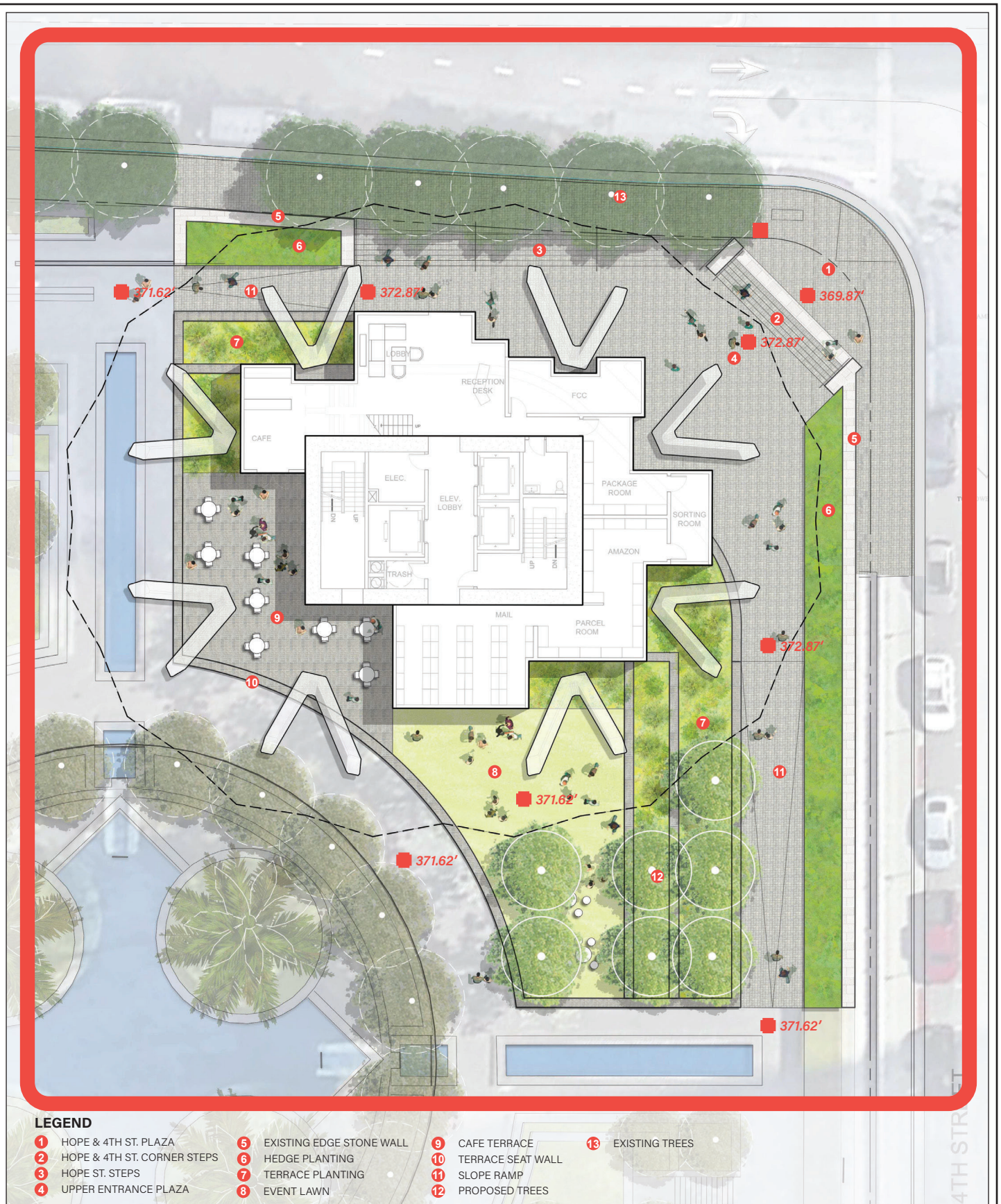


Figure 7
Conceptual Landscape Plan – Plaza Level

parking structure contains a total of 2,185 parking spaces, 1,471 of which are required to support the office uses on the Project Site, leaving a surplus of 706 parking spaces. The Project would also comply with City requirements for providing electric vehicle (EV) parking and electric vehicle charging stations (EVCS), as well as Code-required accessible parking spaces within the proposed residential parking areas. In addition, in accordance with LAMC requirements, the Project would provide 189 bicycle parking spaces, including 169 long-term spaces located on the Concourse Level and 20 short-term spaces located on the Plaza Level.

Primary pedestrian access to the residential tower would be provided via an enhanced entry plaza on Hope Street that would wrap around the corner of Hope Street and 4th Street. Terraced steps would create open, pedestrian-friendly access to the Plaza Level and lobby area and would connect to new and existing pedestrian pathways within the existing park.

2.3.5 Lighting and Signage

The Project would include low-level exterior lights adjacent to the residential tower, along the pathways within the Plaza Level open space area, and on the Level 3 and Roof Level amenity decks for security and wayfinding purposes. In addition, shielded lighting to accent architectural features, landscaping elements, signage, and public art would be incorporated through the Development Area. All exterior lights would be directed onto the Project Site and designed to minimize light trespass from the Project Site. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting, including lighting fixtures on the Level 3 and Roof Level amenity decks, would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto adjacent roadways and neighboring properties. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be architecturally integrated into the design of the residential building and parking entrances and would be aesthetically compatible with the proposed Project and the surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC.

2.3.6 Site Security

The Project would include various security features within the proposed residential building and the existing parking structure. A closed-circuit camera system would be installed and a keycard would be required for the residential uses and resident parking areas. In addition, the building, walkways, and entry points would be properly lit to further the safety and visibility of the Project Site. Furthermore, at the Plaza Level, the design of the Project would enhance safety by reducing dark corners and

inconspicuous areas. In addition, entry points to the residential building would be open to and in view of surrounding areas, which would be designed to encourage community gathering.

2.3.7 Sustainability Features

The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project include, but would not be limited to the following: electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient exterior enclosures and glazing units; WaterSense-labeled plumbing fixtures; Energy Star-labeled appliances; stormwater recycling to irrigate landscaped areas; gray water collection and storage system; weather-based controller and drip irrigation systems; and water-efficient landscape design (i.e., grouping plants according to their water needs, and the use of native and low-water plants); use of renewable energy sources as provided by the energy service provider's portfolio. In addition, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials, when possible.

2.3.8 Anticipated Construction Schedule

Construction of the Project would commence with site clearance and demolition of portions of the Plaza Level, Concourse Level, and subterranean parking levels. This phase would be followed by grading and limited excavation within the existing subterranean parking levels to accommodate structural components of the Project. The Project would require excavation up to approximately 136 feet below grade as measured from the Plaza Level elevation at Hope Street adjacent to the Project Site. It is estimated that approximately 10,500 cubic yards of soil would be exported from the Project Site during the grading/excavation phase. The building foundation would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to occur over a 40-month period and be completed in 2026.

2.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Notice of Exemption pursuant to CEQA Guidelines Section 15062;
- Specific Plan Project Permit Compliance pursuant to Bunker Hill Specific Plan Section 6.B and LAMC Section 11.5.7.C;
- Directors Determination for Alternative Design as permitted by Bunker Hill Specific Plan Section 6.C and LAMC Section 11.5.7.E regarding the following: (a) Bunker Hill Specific Plan Section 8.A. regarding compliance with Downtown Street Standards; (b) Bunker Hill Specific Plan Section 8.B.1. regarding setbacks on retail street (Hope Street);

(c) Downtown Design Guide Section 3.B. regarding setbacks on non-retail street (4th Street); (d) Bunker Hill Specific Plan Section 8.B.2. regarding ground floor treatment on retail street (Hope Street); (e) Downtown design Guide Section 4.B.1 regarding ground floor treatment on non-retail street (4th Street); (f) Bunker Hill Specific Plan Section 8.B.3 regarding massing and street wall on retail street (Hope Street) (g) Bunker Hill Specific Plan Section 8.B.3 regarding massing and street wall on non-retail Street (4th Street); and (h) Downtown Design Guide Section 3.A.2 regarding building projection (Hope Street);

- Zoning Administrator Interpretation as permitted by LAMC Section 12.21.A.2 to clarify that certain covered outdoor areas as defined in the Project's floor area diagrams are exempt from floor area calculations;
- Vesting Tentative Tract Map pursuant to LAMC Section 17.06.A, including approval of a Haul Route and waiver of dedications and improvements, included in the tract map request, for the following: (a) Hope Street—waiver of 12-foot and variable width dedication, waiver of 5-foot sidewalk easement, and waiver of all improvement requirements; (b) Corner of Hope Street and 4th Street—waiver of 20-foot curved radius dedication; (c) 4th Street—waiver of 5-foot dedication, waiver of 3-foot sidewalk easement, and waiver of all improvement requirements; (d) Corner of 4th Street and Flower Street—waiver of 20-foot curved radius dedication; (e) Flower Street—waiver of 3-foot average sidewalk easement and waiver of all improvement requirements; (f) Corner of Flower Street and 3rd Street—waiver of 20-foot curved radius dedication; (g) Lower 3rd Street—waiver of 2-foot dedication along 3rd Street, waiver of 6-foot sidewalk easement, and waiver of all improvement requirements; (h) Upper 3rd Street—waiver of 2.5-foot sidewalk easement and waiver of all improvement requirements; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, sign permits, and tree removal permits.

3 CATEGORICAL EXEMPTION JUSTIFICATION

3.1 INTRODUCTION

As discussed above, Title 14 of the California Code of Regulations, Chapter 3, Article 19, Section 15300 includes a list of classes of projects that have been determined not to have a significant effect on the environment and that shall, therefore, be exempt from the provisions of CEQA. As outlined below, the Project is categorically exempt from CEQA under the Class 32 Exemption, as set forth in Section 15332, Article 19, Chapter 3, Title 14 of the California Code of Regulations. The Class 32 Exemption encompasses urban in-fill projects that are consistent with the conditions outlined in CEQA Guidelines Section 15332(a) through Section 15332(e). Application of this exemption is limited by the regulatory exceptions identified in Section 15300.2(a) through Section 15300.2(f). The Project's consistency with Section 15332 and the non-applicability of Section 15300 is outlined below. In sum, this analysis provides the justification for a Categorical Exemption.

3.2 DISCUSSION OF CEQA GUIDELINES SECTION 15332 (CLASS 32 INFILL DEVELOPMENT PROJECTS)

3.2.1 Consistency with CEQA Section 15332(a): **The project is consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designation and regulations.**

The determination of consistency with applicable general plan policies and zoning designations and regulations is based on whether or not the Project is consistent with the overall intent of the applicable plans or regulations and would not preclude the attainment of their primary goals. State law does not require an exact match between a project and the applicable general plan, but rather, requires that a project be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.⁹ Courts give deference to a public agency's finding of consistency with its own general plan because policies in a general plan reflect a range of competing interests, and the governmental agency must be allowed to weigh and balance the plan's policies when applying them.

The Project would be consistent with the applicable general plan designation and applicable general plan policies as well as with applicable zoning designation and regulations. The City has considered all general plan policies and has concluded that the following documents are applicable to this analysis: the City of Los Angeles General Plan including the Framework Element, Housing Element, Conservation Element, Mobility Plan 2035, the Los Angeles Health and Wellness Element; Central City Community Plan (Community Plan); Los Angeles Municipal Code (LAMC); and the Bunker Hill Specific Plan (Specific Plan). Policies not included in the analysis below have been reviewed and are considered to be not applicable to the Project. Therefore, a consistency analysis is not required. The

⁹ Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th.704, 719.

Project's consistency with the policies and regulations outlined in these documents is discussed below and summarized in Table 2 through Table 6 further below.

3.2.1.1 Los Angeles General Plan

Framework Element

The Framework Element sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element is discussed in Table 2 on page 22 and summarized below.

Land Use Chapter

The Project Site has a Regional Center Commercial land use designation. Pursuant to the Framework Element, Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity. Regional Centers are characterized as providing a diversity of uses. The Framework Element encourages mixed-use developments in Regional Centers, integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces, and amenities. Regional Centers typically provide a significant number of jobs and should function as a hub for regional bus and rail transit. In accordance with the Central City Community Plan, corresponding zoning designations that are consistent with the Regional Center Commercial land use designation include CR, C1.5, C2, C4, C5, R3, R4, RAS3 and RAS4 zones. The Project would support and would be consistent with the Framework Element Land Use Chapter as it would contribute to the needs of the City's existing and future residents by providing a residential development consisting of 366 multi-family residential units with associated amenities and a ground floor café, with a total proposed new floor area of 309,160 square feet with integrated amenities and surrounding open spaces. Project Site. The proposed uses would be provided on a site that already includes an office building, a subterranean parking structure, and open space. The Project would be designed to complement the surrounding architecture while contributing a unique building to the rich urban fabric and skyline of the Bunker Hill neighborhood, which is characterized by an eclectic mix of buildings and architectural styles. In addition, the Project would be developed within a transit-rich neighborhood and would provide opportunities for walking and biking, promote a safe and improved pedestrian environment, and facilitate a reduction of vehicle trips and vehicle miles traveled. Thus, the Project would not conflict with the applicable goals set forth in the Framework Element's Land Use Chapter.

Table 2
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	No Conflict. The Project would provide much-needed housing opportunities near accessible transit and locate new residential land uses in the highly urbanized area of Downtown Los Angeles, adjacent to several existing commercial, retail, and cultural establishments, thereby improving the jobs-housing balance in the Downtown area. The Project would be consistent with surrounding uses and would complement the existing character of the area. Furthermore, as detailed in Section 3.2.5 below, the agencies that provide public infrastructure and services to the Project Site would have adequate infrastructure and capacity to serve the Project. The Project would be developed with sustainability features and landscaped open space and recreational areas. The Project would provide bicycle parking and amenities on-site and enhance existing pedestrian activity by providing terraced steps at the corner of Hope Street and 4th Street to create open, pedestrian-friendly access to the Plaza Level and lobby area and connectivity to new and existing pedestrian pathways within the Project Site. The Project Site is also transit accessible and is in close proximity to many bus transit lines, rail lines, and shuttle services made available by Metro, LADOT, and other transit providers. As such, the Project would contribute to the City's vision of a more livable city with adequate infrastructure, alternative transportation, reduced congestion, and improved air quality. The Project would support the needs of existing and future residents, businesses, and visitors in a transit-oriented mixed-use neighborhood of the City. Therefore, the Project would not conflict with this goal and objective.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	No Conflict. The Project would provide 366 new multi-family residential units in in the Central City Community Plan Area. The proposed residential units would serve to fill a need for housing in Downtown Los Angeles, which contains a diverse mix of uses. Thus, the Project would result in a diversity of uses that would support the needs of the City's existing and future residents, businesses, and visitors, and would not conflict with this objective.
Policy 3.1.3: Identify areas for establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities include a citywide linear network of parklands and trails, neighborhood parks, and public open spaces.	No Conflict. The Project would incorporate a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
	residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the plaza, and interior meeting rooms and lounge areas. As previously discussed, approximately 89 percent of the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped lawn areas. The Project's open space areas would serve the needs of existing and future residents of the area. Thus, the Project would not conflict with this policy.
Policy 3.1.7: Allow for development in accordance with the policies, standards, and programs of specific plans in areas in which they have been adopted. In accordance with Policy 3.1.6, consider amending these plans when new transit routes and stations are confirmed and funding is secured.	No Conflict. The Project is located within the Bunker Hill Specific Plan area. The Project would be largely consistent with, and would help implement, the Specific Plan. For example, the proposed floor area would be in compliance with the Specific Plan, and its implementing documents, regarding permitted floor area for the Project Site. The Project would meet the Specific Plan standards and includes a mechanism (through Section 6 of the Specific Plan) which allows the Director to determine that alternative designs conform with the purpose and intent of the Specific Plan regulations. The City has accordingly found that the Project is consistent with the standards of the Specific Plan, inclusive of the approvals associated with (a) Bunker Hill Specific Plan Section 8.A. regarding compliance with Downtown Street Standards; (b) Bunker Hill Specific Plan Section 8.B.1. regarding setbacks on retail street (Hope Street); (c) Downtown Design Guide Section 3.B. regarding setbacks on non-retail street (4th Street); (d) Bunker Hill Specific Plan Section 8.B.2. regarding ground floor treatment on retail street (Hope Street); (e) Downtown design Guide Section 4.B.1 regarding ground floor treatment on non-retail street (4th Street); (f) Bunker Hill Specific Plan Section 8.B.3 regarding massing and street wall on retail street (Hope Street) (g) Bunker Hill Specific Plan Section 8.B.3 regarding massing and street wall on non-retail Street (4th Street); and (h) Downtown Design Guide Section 3.A.2 regarding building projection (Hope Street). Additionally, the Project would develop and revitalize an underutilized portion of the Project Site with a new mixed-use residential development within 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station, both of which serve the Metro B (formerly known as Red) and D (formerly known as Purple) lines, as called for in the Specific Plan and in numerous other City land use plans. Hence, the Project would not conflict with this policy. See Table 5 below, for further discussion.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/	No Conflict. The Project is located in a transit-rich neighborhood serviced by Metro, LADOT, and other transit providers. Specifically, the Project Site is located approximately 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station, both of which serve the Metro B (formerly known as Red) and D (formerly known as Purple)

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
bicycle access and use in appropriate locations.	lines. The Project Site is also served by numerous transit lines primarily along Flower Street, Hope Street, Figueroa Street, Grand Avenue, and 5th Street that are operated by Metro, LADOT Downtown Area Short Hop (DASH), LADOT Commuter Express (CE), Foothill Transit, Antelope Valley Transit Authority (AVTA), Torrance Transit, Orange County Transportation Authority (OCTA), Santa Monica Big Blue Bus (BBB), and Montebello Bus Lines. The Project would also provide short- and long-term bicycle parking to encourage non-motorized travel. Overall, the proposed residential uses located on a site that contains an existing office tower and in a dense urban area would facilitate a reduction of vehicle trips and vehicle miles traveled (VMT). Thus, the Project would not conflict with this objective and corresponding policy.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	No Conflict. The Project would provide new multi-family residential uses in a Regional/Downtown Center along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts by developing and focusing residential and commercial uses within a Downtown infill site that does not displace or otherwise impinge on existing residential uses in the area.
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	No Conflict. The Project would introduce new multi-family residential housing opportunities integrated with existing commercial and open space (including both common publicly accessible and private open space) uses. By providing a mixed-use project within an urban infill site already served by utility infrastructure, services and transit, the Project would promote the stability and enhancement of multi-family residential development in the Downtown Center and would represent growth in an area with sufficient public infrastructure and services such that resident quality of life in the area would be maintained and improved. Overall, the Project would not conflict with this objective.
Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans.	No Conflict. The Project Site is designated as Regional Center Commercial in the Central City Community Plan and is zoned C4-4D (Commercial Zone, Height District 4 with Development Limitations). Pursuant to the LAMC, the C4-4D Zone permits a wide array of commercial land uses including retail, office, hotels, schools, and parks, as well as any land uses permitted in the R4 (Multiple Residential) Zone, which includes one- and two-family dwelling units and apartment buildings. As previously discussed, the Project would introduce new multi-family residential units on a site designated and zoned for such uses. Therefore, the Project would not conflict with this policy.
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter.	No Conflict. The Project would introduce high quality multi-family dwelling units based on the standards in the Urban Form and Neighborhood Design Chapter, as discussed later in this table. Specifically, the Project is an infill development that would provide 366 multi-family residential units with associated amenities and a ground floor café. The

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
	Project would also incorporate numerous common and private open space and recreational amenities within the Project Site, including approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. With implementation of the proposed uses and open space areas, the Project would provide a high-quality development and improve the quality of the public realm (one of the primary goals of the Urban Form and Neighborhood Design chapter). Thus, the Project would not conflict with this policy.
Goal 3E: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities. Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places to in which to live, work, visit, both in daytime and nighttime. Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	No Conflict. The Project is a new residential development on an urban infill site in a highly urbanized and active area within the City. The Project's proposed uses would include residential units, a small ground floor café, and open space uses that would be generally accessible to the public during day time hours. The Project would be pedestrian friendly and would enhance existing pedestrian activity by providing terraced steps at the corner of Hope Street and 4th Street to create open, pedestrian-friendly access to the Plaza Level and lobby area and connectivity to new and existing pedestrian pathways within the Project Site. Additionally, as discuss above, the Project would be located in a transit-rich neighborhood and would be serviced by Metro, LADOT, and other transit providers. The Project's uses, accessibility, and design would reinforce the existing Downtown Center, make it a desirable place to live, work, and visit, while enhancing urban lifestyles. Cultural, entertainment, and culinary destinations would be easily accessible to residents, visitors, and employees. Thus, the Project would not conflict with this goal and its corresponding objectives.
Policy 3.9.8: Support the development of public and private recreation and small parks by incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	No Conflict. The Project would incorporate a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the Plaza, and interior meeting rooms and lounge areas. As previously discussed, approximately 89 percent of the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped the lawn areas. The Project's open space areas would serve the needs of existing and future residents of the

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
	area, as well as employees and visitors to Downtown Los Angeles. The Project would also enhance existing pedestrian activity by providing terraced steps at the corner of Hope Street and 4th Street to create open, pedestrian-friendly access to the Plaza Level and lobby area and connectivity to new and existing pedestrian pathways within the Project Site. Thus, the Project would not conflict with this policy.
Goal 3G: A Downtown Center as the primary economic, governmental, and social focal point of the region with an enhanced residential community. Objective 3.11: Provide for the continuation and expansion of government, business, cultural, entertainment, visitor serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.	No Conflict. The Project would provide 366 multi-family residential units with associated amenities and a ground floor café within a new 34-story multi-family residential structure that offers landscaping, open space, and recreational amenities to residents within the Downtown Center. The Project would be designed to complement the surrounding architecture while contributing a unique building to the rich urban fabric and skyline of the Bunker Hill neighborhood. In addition, the Project would be located approximately 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station. The Project Site is also served by numerous transit lines primarily along Flower Street, Hope Street, Figueroa Street, Grand Avenue, and 5th Street that are operated by Metro, LADOT DASH, LADOT CE, Foothill Transit, AVTA, Torrance Transit, OCTA, Santa Monica BBB, and Montebello Bus Lines. The Project's location offers a unique cross-section of cultural, entertainment, and culinary experiences that only Downtown can offer with iconic institutions such as, the nearby Broad Museum, Walt Disney Concert Hall, Museum of Contemporary Art, Dorothy Chandler Pavilion, and Grand Central Market. Therefore, the Project would not conflict with this goal and corresponding objective.
Policy 3.13.6: Design multi-family residential units to minimize the impacts of traffic and noise and incorporate recreational and open space amenities to support the needs of the residents.	No Conflict. By providing a residential project on an urban infill site located in a transit-rich neighborhood, the Project would facilitate a reduction of vehicle trips. The Project would also provide short- and long-term bicycle parking to encourage non-motorized travel. Lastly, as discussed in detail in Policy 3.1.3 and Policy 3.13.5, above, the Project would incorporate recreational and open space amenities to support the needs of the on-site residents and the surrounding community. The above would minimize traffic and traffic noise and support the needs of residents of both the Project and the greater Downtown Center area. Thus, the Project would not conflict with this policy.
Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic-quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses. Policy 3.15.2: Work with developers and the Metropolitan Transportation Authority to incorporate public- and neighborhood-serving	No Conflict. The proposed Project would be located within an urban infill site currently occupied with a high-rise office building, an outdoor plaza, and a parking structure that is located beneath most of the Project Site. The Project would improve the site and visitor experience at the Project Site by introducing new multi-family residential units integrated with commercial and open space (including both common publicly accessible and private open space) uses. Furthermore, the Project would be developed within Downtown Los Angeles, in an area of mixed use mid- and high-rise structures, rather

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
uses and services in structures located in proximity to transit stations, as appropriate.	than within a low-density residential neighborhood, and thus would not represent the encroachment of incompatible land uses into a low-density neighborhood. Thus, the Project would not conflict with this objective and corresponding policy.
Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents. Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	No Conflict. With development of the Project, enhanced pedestrian access would be provided at the corner of Hope Street and 4th Street, where the Project would remove existing landscaped planters to provide terraced steps that would create open, pedestrian-friendly access to the Project Site and would activate new and existing pedestrian walkways within the Project Site. Thus, the Project would not conflict with this goal and its corresponding objective.
Housing Chapter	
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City. Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	No Conflict. The Project would support and not conflict with this Citywide goal by providing different housing unit types at various costs through the development of 366 new multi-family residential units consisting of studios, one-bedroom units, and two-bedroom units. Therefore, the Project will not conflict with this goal.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	No Conflict. As previously discussed, the Project would be located in an area well-served by public transit. Specifically, the Project would be located approximately 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station. The Project Site is also served by numerous transit lines primarily along Flower Street, Hope Street, Figueroa Street, Grand Avenue, and 5th Street that are operated by Metro, LADOT DASH, LADOT CE, Foothill Transit, AVTA, Torrance Transit, OCTA, Santa Monica BBB, and Montebello Bus Lines. The proposed new multi-family housing would also be located within a high activity area in the Downtown Center. Therefore, the Project would not conflict with this objective.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	Not Conflict. The Project would further the City's objective to encourage development in centers along transit that already function as centers for the surrounding neighborhood, community and region by developing a residential project on an urban infill site in a transit-rich area.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	No Conflict. As a development within Downtown Los Angeles and on a site designated as Regional Center Commercial, the Project would provide an improved and aesthetically appealing streetscape that would promote pedestrian activity. The Project would establish strong pedestrian orientation within the City Center by: (1) developing a commercial use (café) on the ground floor; (2) pedestrian walkways surrounding and connecting within the Project Site; and (3) providing terraced steps at the corner of

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
	Hope Street and 4th Street to create open, pedestrian-friendly access to the Plaza Level and lobby area. In addition, the Project would promote walkability by encouraging the use of public transit since the Project Site is near many transit options. In addition, the Project would include proper lighting of along pathways, walkways, and amenity decks for security and wayfinding purposes. Thus, this Project would not conflict with this objective.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	No Conflict. The Project would incorporate elements that promote individual and community safety. Specifically, the Project would provide a closed-circuit camera system, and a keycard would be required for the residential uses and the residential parking areas. In addition, the building, walkways, and entry points would be properly lit to enhance safety and visibility. Additional design features would be incorporated at the Plaza level to enhance safety by reducing dark corners and inconspicuous area, and entry points to the residential building would be open to and in view of surrounding areas. By implementing these design strategies, the Project would help increase personal safety at all times of day. The Project would not conflict with this objective.
Open Space and Conservation Chapter	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.	No Conflict. The Project would contribute to the open space system, and would not conflict with this goal, by providing a variety of open space (including both common publicly accessible and private open space). Specifically, the Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the plaza, and interior meeting rooms and lounge areas. In addition, the Project would redevelop an approximately 5,097-square-foot pedestrian plaza area. As previously discussed, approximately 89 percent of the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped the lawn areas. The Project's open space areas would serve the needs of existing and future residents of the area. Therefore, the Project would not conflict with this goal.
Policy 6.3.3. Utilize development standards to promote development of public open space that is visible, thereby helping to keep such	No Conflict. As discussed above, the Project would provide approximately 22,693 square feet of publicly accessible open space located on the Plaza Level. At the Plaza Level,

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
spaces and facilities as safe as possible.	landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. These open space areas would be visible along Hope Street, 4th Street, and Flower Street. See Objective 5.9 regarding the Project Design Features that would promote individual and community safety on the Project Site.
Economic Development Chapter	
Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.	No Conflict. The Project would develop 366 new residential units within Downtown Los Angeles in an area designated as a TPA and in close proximity to multiple transit opportunities. The proposed unit types would include a range of studios and one- to two-bedroom units. Due to the Project's location in the Downtown Center and the proposed mix of uses, residents of the Project would have access to numerous transportation, employment, shopping and entertainment opportunities and public services. Also, the housing opportunities provided by this Project would help the City accommodate future population growth and allow for a portion of the City's work force to both live and work in the City. Thus, the Project would not conflict with this objective.
Infrastructure and Public Services Chapter	
Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.	No Conflict. While this is a citywide goal, as evaluated in the Section 3.2.5.7, Wastewater, of this document, the Project's net increase of approximately 94,715 gallons of wastewater per day, or approximately 0.06 million gallons per day (mgd) would represent approximately 0.05 percent of the available capacity of 190.2 mgd at the Hyperion Treatment Plant. In addition, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer main adjacent to the Project site. As discussed in Section 3.2.5 of this document, agencies providing public services and utilities to the Project site would have capacity to serve the Project.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. As discussed in the Section 3.2.4.4, Water Quality, of this document, Project construction activities would occur in accordance with City grading permit regulations and NPDES requirements to minimize the discharge of pollutants in stormwater runoff. The Project would implement best management practices (BMPs) during operation in compliance with the LID Ordinance. The Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site; or substantially increase runoff to result in flooding during construction and operation. Therefore, the Project would not conflict with this policy.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based	No Conflict. The Project would implement BMPs to minimize the discharge of pollutants in stormwater runoff during construction. During operation, the Project would implement

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
approaches that balance environmental, economic and engineering considerations. Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	LID strategies to manage stormwater runoff in accordance with the current City of Los Angeles LID Ordinance requirements.
Goal 9C: Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses. Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	No Conflict. As discussed in Section 3.2.5.6, Water Supply, of this document, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with this policy.
Goal 9F: Adequate collection, transfer and disposal of mixed solid waste—the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner than minimizes adverse environmental impacts.	No Conflict. As discussed in Section 3.2.5.12, Solid Waste, of this document, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. Based on the above, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, the Project would not conflict with this goal.
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	No Conflict. Project lighting would incorporate low-level exterior lights adjacent to the residential tower, along the pathways within the Plaza Level open space area, and on the Level 3 and Roof Level amenity decks for security and wayfinding purposes. In addition, shielded lighting to accent architectural features, landscaping elements, signage, and public art would be incorporated through the Development Area. All exterior lights would be directed onto the Project Site and designed to minimize light trespass from the Project Site. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting, including lighting fixtures on the Level 3 and Roof Level amenity decks, would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto adjacent roadways and neighboring properties. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations. Therefore, the Project would not conflict with this goal.

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goal/Objective/Policy	Would the Project Conflict?
Source: <i>Eyestone Environmental, May 2022.</i>	

Urban Form and Neighborhood Design Chapter

The Project would promote the applicable goals and objectives of the Urban Form and Neighborhood Design Chapter by introducing a new mixed-use residential development that would activate the existing site. Specifically, the Project would provide 366 multi-family residential units with associated amenities and a ground floor café, with a total proposed new floor area of 309,160 square feet, on an underutilized portion of the Project Site, which would be activated by the new residential tower and its residents. The uses would be developed within close proximity to a variety of transit stations and lines. The Project would also incorporate elements that promote individual and community safety, such as the inclusion of a closed-circuit camera system and keycard entry for the residential uses and resident parking areas; proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building; building entrances and exits and open spaces areas designed to be open and in view of surrounding sites. Furthermore, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. Therefore, the Project would not conflict with the applicable goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

The Project would support the goals and policies of the Open Space and Conservation Chapter by providing a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the plaza, and interior meeting rooms and lounge areas. In addition, the Project would redevelop an approximately 5,097-square-foot pedestrian plaza area. As previously discussed, approximately 89 percent the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped the lawn areas. Therefore, the Project would not conflict with the applicable goals set forth in the Framework Element's Open Space and Conservation Chapter.

Economic Development Chapter

The Project would support the City's objective to establish a balance of land uses through the development of residential uses on a site that contains office uses, parking, and open space. Due to the Project's location in Downtown Los Angeles, residents of the Project would have access to numerous transportation, employment, shopping, and entertainment opportunities and public services. Also, the housing opportunities provided by the Project would help the City accommodate future population growth and allow for a portion of the City's work force to both live and work in the City. Therefore, the Project would not conflict with the applicable goals set forth in the Framework Element's Economic Development Chapter.

Infrastructure and Public Services Chapter

Project construction activities would occur in accordance with City grading permit regulations and National Pollutant Discharge Elimination System (NPDES) requirements to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would implement BMPs in accordance with the Low Impact Development (LID) Ordinance to collect, detain, treat, and discharge runoff on-site, which would minimize the discharge of pollutants in stormwater runoff. Furthermore, as discussed in Section 3.2.5 below, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. In addition, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. Therefore, the Project would not conflict with the applicable goals set forth in the Framework Element's Infrastructure and Public Services Chapter.

Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan is outlined in Table 3 on page 33. The Project would support the City's policy to provide for safe passage of all modes of travel during construction by implementing a Construction Management Plan that incorporate safety measures around the construction site to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also support Mobility Plan 2035 policies to ensure high quality pedestrian access and to provide a safe and comfortable walking environment through the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site; and well-designed vehicular access driveways in accordance with the City's design considerations. Additionally, street trees would be included as part of the streetscape plan to provide adequate shade and a more comfortable environment for pedestrians. The large, landscaped plaza on the Project Site would further contribute to the inviting and comfortable environment.

Furthermore, the Project would support ways to reduce VMT and promote the City's policy to recognize all modes of travel by providing safe and accessible pedestrian, bicycle, and vehicular access. In addition, as previously described, the Project is located in an area well-served by public transit. Specifically, the Project Site is located approximately 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station. The Project Site is also served by numerous transit lines primarily along Flower Street, Hope Street, Figueroa Street, Grand Avenue, and 5th Street that are operated by Metro, LADOT DASH, LADOT

Table 3
Applicable Goals, Objectives, and Policies of Mobility Plan 2035

Goals/Objective/Policy	Would the Project Conflict?
Mobility Plan 2035	
Policy 1.6 Multi-Modal Detour Facilities: Design detour facilities to provide safe passage for all modes of travel during times of construction.	No Conflict. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that the parking lane and one travel lane on Hope Street adjacent to the Project Site would temporarily be utilized as a staging area for construction equipment. Flower Street would also be used as a staging area for construction equipment, resulting in a temporary closure of the Flower Street driveway for up to eight months. The sidewalks and parking lane along 4th Street adjacent to the Project frontage would also be temporarily closed. Travel lanes would be maintained along the Flower Street and 4th Street Project frontages throughout the construction period. As discussed in the Transportation Assessment, included as Appendix B of this document, a Construction Management Plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, the Project would provide safe passage for all modes of travel during construction and would not conflict with this policy.
Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	No Conflict. The Project would encourage pedestrian activity on and around the Project site through its design via the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site; and well-designed vehicular access driveways in accordance with the City's design considerations. Additionally, street trees would be included as part of the streetscape plan to provide adequate shade and a more comfortable environment for pedestrians. The large, landscaped plaza on the Project Site would further contribute to the inviting and comfortable environment. In addition, the Project site's proximity to a variety of public transit options and nearby commercial and office uses would promote walkability and reduce vehicle miles traveled. Therefore, the Project would not conflict with this policy.
Policy 2.4 Neighborhood Enhanced Network: Provide a slow speed network of locally serving streets.	No Conflict. While this is a citywide policy, the Project would not conflict with its implementation. Hill Street south of 4th Street and Hope Street south of 5th Street have been identified as a part of the Neighborhood Enhanced Network (NEN). None of the Project frontages are along streets that are part of the NEN. Therefore, the Project would not conflict with this policy.
Policy 2.5 Transit Network: Improve the performance and reliability of existing and future bus service.	No Conflict. While this is a citywide policy, the Project would not conflict with its implementation. The Project Site is not immediately adjacent to any Transit Enhanced Streets as identified in Mobility Plan 2035. In addition, as previously discussed, there is substantial existing transit capacity in the Project vicinity, including rail and bus lines. Therefore, the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict

Table 3 (Continued)
Applicable Goals, Objectives, and Policies of Mobility Plan 2035

Goals/Objective/Policy	Would the Project Conflict?
	with this policy.
Policy 2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	No Conflict. While this is a citywide policy, the Project would support its implementation. The Project frontages are not along streets that are part of the Bicycle Enhanced Network (BEN); however, Flower Street is designated as part of the Bicycle Lane Network. In accordance with the LAMC, the Project would provide 189 bicycle parking spaces, including 169 long-term and 20 short-term spaces. Long-term spaces would be located on the Concourse Level and short-term bicycle parking would be located on the Plaza Level. Therefore, the Project would not conflict with policy.
Policy 2.10 Loading Areas: Facilitate the provision of adequate on and off-street loading areas.	No Conflict. Truck loading areas would be separated from pedestrian and bicycle interaction and would be accommodated completely on site within the existing parking infrastructure, with access to the loading areas provided via 4th Street. Therefore, the Project would not conflict with this policy.
Policy 2.17 Street Widening: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	No Conflict. As outlined in the Project Description, the Project is requesting a Vesting Tentative Tract Map that would modify, via requests for waivers of dedications and improvements, the Flower Street, 4th Street, Hope Street, and 3rd Street Project frontages pursuant to LAMC Section 17.05 and the exceptions set for in Section 12.37 I.3. As discussed below and in interdepartmental correspondence on the tract map for the Project, and as indicated in the Transportation Assessment included as Appendix B of this document, due to the on- and off-site conditions, dedications and improvements are physically infeasible and unnecessary to meet the mobility needs in this area. In addition, the Project only proposes development within the southeast quadrant of the Project Site at the corner of Hope Street and 4th Street (Development Area) and the existing conditions along the Project frontages would remain largely unchanged. Thus, with approval of the Vesting Tentative Tract Map, including the related waivers of dedications and improvements, the Project would not require street widening along adjacent streets. Therefore, the Project would not conflict with this policy.
Policy 3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	No Conflict. The Project would promote this policy by providing safe and accessible pedestrian, bicycle, and vehicular access. In addition, as previously described, the Project is located in an area well-served by public transit. The Project Site is located approximately 0.25 mile from the Metro Pershing Square Station and approximately 0.3 mile from the Metro Civic Center/Grand Park Station. The Project Site is also served by numerous transit lines primarily along Flower Street, Hope Street, Figueroa Street, Grand Avenue, and 5th Street that are operated by Metro, LADOT DASH, LADOT CE, Foothill Transit, AVTA, Torrance Transit, OCTA, Santa Monica BBB, and Montebello Bus Lines. Therefore, the Project would provide opportunities for the use of all

Table 3 (Continued)
Applicable Goals, Objectives, and Policies of Mobility Plan 2035

Goals/Objective/Policy	Would the Project Conflict?
	modes of travel and would not conflict with this policy.
Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	No Conflict. The Project would provide a new development consisting of residential uses with a ground floor café in proximity to existing jobs (including those associated with the office tower located on the Project Site), destinations, and other neighborhood services in a transit-rich area. The proposed uses would be within walking/biking distance and/or accessible via transit services, reducing vehicular trips. Therefore, the Project would be not conflict with this policy.
Policy 3.4 Transit Services: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	No Conflict. As discussed in Policy 3.1. the Project would be well-served by public transit service within the vicinity. Thus, residents, workers, and visitors of the Project would be well-served by affordable, efficient, convenient, and attractive transit services, which would promote transit use and a reduction in vehicle trips, and, as such, the Project would not conflict with this policy.
Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle facilities.	No Conflict. See Policy 2.6 of the Mobility Plan. In accordance with the LAMC, the Project would provide 189 bicycle parking spaces, including 169 long-term and 20 short-term spaces. Long-term spaces would be located on the Concourse Level and short-term bicycle parking would be located on the Plaza Level. The Project would not conflict with this policy.
Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	No Conflict. As detailed in the Transportation Assessment, included as Appendix B of this document, the Project does not have significant traffic or transportation impacts, and does not require any TDM or mitigation measures, and thereby does not need TDM to further reduce dependence on single occupancy vehicles especially considering the proximity of the Project Site to transit options.
Policy 5.1 Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health. Policy 5.2 Vehicle Miles Traveled: Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. The Project would promote a sustainable transportation system to reduce VMT by locating housing in proximity to jobs, transit, and services. Project residents would therefore have the opportunity to walk, bike, and ride transit to access the Downtown Center and surrounding areas. The Project would provide pedestrian enhancements such as pedestrian walkways surrounding and within the Project Site that would provide better connections to existing and future transit stops. The Project would also provide bicycle parking and repair facilities (work area) to encourage bicycling and walking for residents, employees, and visitors to the Project Site. Thus, the Project would promote the use of walking, biking, and transit, and would support VMT reduction. Therefore, the Project would not conflict with this policy.
Policy 5.4 Clean Fuels and Vehicles: Continue to encourage the adoption of low and zero emission fuel sources, new mobility	No Conflict. While this policy applies to large-scale goals relative to fuel sources, technologies and infrastructure, the Project would support and not conflict with this policy. The

Table 3 (Continued)
Applicable Goals, Objectives, and Policies of Mobility Plan 2035

Goals/Objective/Policy	Would the Project Conflict?
technologies, and supporting infrastructure.	Project would encourage the use of transit and other alternative modes of transportation due to its proximity to transit. The Project would also provide parking spaces that are equipped with electric vehicle (EV) charging stations and additional spaces capable of supporting future electric vehicle supply equipment (EVSE). Therefore, the Project would not conflict with this policy.
Policy 5.5 Green Streets: Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.	No Conflict. As discussed in Section 3.2.4.4 below, the Project would implement a SWPPP during construction as required under the NPDES General Construction Permit. The Project would also implement BMPs, including erosion control and stormwater and non-stormwater management to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would implement LID strategies in accordance with the current City of Los Angeles LID Ordinance requirements. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project site and the elimination of pollutant runoff up to the 85th percentile storm event. Thus, the Project would maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.
Source: Eyestone Environmental, May 2022.	

CE, Foothill Transit, AVTA, Torrance Transit, OCTA, Santa Monica BBB, and Montebello Bus Lines. The LADOT reviewed the Project according to the Transportation Assessment Guidelines (TAG) and found that the Project was consistent with applicable traffic plans, had no significant impacts, and did not require mitigation measures. Therefore, the Project would not conflict with the applicable policies set forth in the Mobility Plan.

Housing Element

The 2021–2029 Housing Element (Housing Element) identifies City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The Project's consistency with the applicable goals, policies, and objectives set forth in the Housing Element is analyzed in Table 4 on page 37. As described therein, the Project would provide 366 new Studio, 1-bedroom, and 2-bedroom dwelling units, thereby directly providing a range of new housing opportunities for the City's residents. The Project would provide these new housing opportunities for residents in Downtown Los Angeles' diverse residential and commercial environment, while also enabling residents to utilize existing transit infrastructure in the vicinity of the Project Site. Additionally, the Project would further contribute to an active pedestrian environment through its landscaping and other streetscape improvements. Also, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and

Table 4
Applicable Objectives and Policies of the General Plan Housing Element 2021–2029

Policy	Would the Project Conflict?
Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.	No Conflict. The Project would develop 366 new multi-family residential apartment units in a range of configurations and offered at different prices based on unit type, thereby producing more housing and providing options to meet the existing and future needs of City residents.
Policy 1.1.4: Plan for and provide sufficient services and amenities to support the existing and planned population.	No Conflict. While this is a citywide goal, as outlined in Section 3.2.3, below, the existing infrastructure would have sufficient capacity to accommodate the Project. In addition, the Project would provide a variety of open space and recreational amenities. Thus, overall, the Project would provide sufficient services and amenities to support the needs of the Project residents.
Policy 1.2.1: Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs. Policy 1.2.2: Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.	No Conflict. The Project would develop 366 new multi-family residential apartment units that would be offered at different prices based on unit type, providing options to meet the existing and future needs of City residents.
Policy 1.3.2: Prioritize the development of new Affordable Housing in all communities, particularly those that currently have fewer Affordable units.	No Conflict. This is a citywide policy which applies to all communities in the City, and thus is not a project specific policy. Nonetheless, the Project does not conflict with this policy because it provides substantial funding to the City for the development of affordable housing units by complying with the Affordable Housing Linkage Fee (Ordinance 185,342), which imposes fees on new market-rate residential projects to help fund Affordable Housing in the City. The Project has paid such fees and thereby helps the City prioritize the development of new Affordable Housing in communities throughout the City.
Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.	No Conflict. This is a citywide policy which applies to the City generally, and thus is not a project specific policy. Nonetheless, the Project does not conflict with this goal because it delivers new quality housing units in the downtown area, which helps stabilize housing stock and helps enhance the offering of a variety of housing units available for different levels of income.
Objective 2.1: Strengthen renter protections, prevent displacement and increase the stock of affordable housing.	No Conflict. This is a citywide policy which applies to the City generally, and thus is not a project specific policy. Nonetheless, the Project does not conflict because the it is developed on a site that does not have existing housing, and thereby would not displace and existing residents or affordable housing stock.
Policy 2.1.6: Promote the use of housing for long-term residents and limit practices such as short-term rentals, conversions to hotels, and prolonged vacancies.	No Conflict. The Project would deliver rental units that are designed for long-term residents. The location, rental types, building design and rental obligations are not for short term rentals. The site is also vacant, being developed as ground-up construction and does not involved

Table 4 (Continued)
Applicable Objectives and Policies of the General Plan Housing Element 2021–2029

Policy	Would the Project Conflict?
	conversion to hotels.
Objective 2.3: Preserve, conserve and improve the quality of housing.	No Conflict. The Project would improve the quality of housing in the downtown area by creating new rental units that are adjacent to transit and within walkable distances to jobs, which has several environmental benefits. The Project would add new stock to the available housing units and improve the overall quality and selection of housing in the community plan area.
Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos. Policy 3.1.5: Develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks. Policy 3.1.7: Promote complete neighborhoods by planning for housing that includes open space, and other amenities.	No Conflict. The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). The sustainability features to be incorporated into the Project include, but would not be limited to the following: electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient exterior enclosures and glazing units; WaterSense-labeled plumbing fixtures; Energy Star-labeled appliances; stormwater recycling to irrigate landscaped areas; gray water collection and storage system; and weather-based controller and drip irrigation systems; water-efficient landscape design (i.e., grouping plants according to their water needs, and the use of native and low-water plants). In addition, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials, when possible. In addition, the Project would develop residential units that would include open space and other amenities. The Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the plaza, and interior meeting rooms and lounge areas. As previously discussed, approximately 89 percent of the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped the lawn areas. In addition, street trees would be included as part of the streetscape plan to provide adequate shade and a more comfortable environment for

Table 4 (Continued)
Applicable Objectives and Policies of the General Plan Housing Element 2021–2029

Policy	Would the Project Conflict?
	pedestrians. Thus, the Project would not conflict with this policy.
Objective 3.1: Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.	No Conflict. The design of Project integrates with the existing plaza on the site, and the architecture blends with a reflects nearby buildings, which thereby creates a sense of place for the new development. The design is intended to have minimal impacts on the existing sense of place, and enhance the experience of the residents and office workers, which will foster community and promote socially inclusive neighborhoods that blend the work-life balance of downtown residents.
Policy 3.1.2: Promote new development that furthers Citywide Housing Priorities in balance with the existing architectural and cultural context.	No Conflict. The design of Project integrates with the existing plaza on the site, and the architecture blends with a reflects nearby buildings, which thereby creates a sense of place for the new development. This intentional use and respect of the existing features on the site blended with a new residential use creates a residential-commercial balance that is representative of the culture and history of the Bunker Hill area in downtown.
Policy 3.1.4: Site buildings and orient building features to maximize benefit of nearby amenities and minimize exposure to features that may result in negative health or environmental impacts. Objective 3.2: Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options. Policy 3.2.1: Promote the integration of housing with other compatible land uses at both the building and neighborhood level. Policy 3.2.2: Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions. Policy 3.2.5: Promote and facilitate the reduction of water, energy, carbon and waste consumption in new and existing housing. Policy 3.2.7: Provide environmentally sustainable development standards and incorporate sustainable best practice in building and zoning code updates. Policy 3.2.9: Consider accommodating new residential uses, including live/work and mixed-use, in less-productive industrial, office, and	No Conflict. The Project would support and not conflict with these Citywide policies and objective by providing much needed housing in a dense urban area that includes a mix of uses. Furthermore, the Project would be located in an area well-served by public transit and in proximity to compatible urban land uses that would encourage pedestrian activity and contribute to the vibrant urban environment. In addition, the Project would provide bicycle parking to further encourage alternative modes of transportation. The Project would preserve the area's mixed-use character and would add to the attractive regional commercial center. The Project would incorporate environmentally sustainable design features as required by the Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's LEED green building program to achieve LEED Silver certification or equivalent green building standards.

Table 4 (Continued)
Applicable Objectives and Policies of the General Plan Housing Element 2021–2029

Policy	Would the Project Conflict?
commercial areas when the site can accommodate housing in keeping with citywide industrial land, jobs-housing and jobs preservation priorities, and when sites have been appropriately tested and remediated, if necessary. Policy 3.3.1: Promote the integration of housing with other compatible land uses at both the building and neighborhood level.	
Objective 4.1: Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, color, ancestry, sex, national origin, color, religion, sexual orientation, gender identity, marital status, immigration status, family status, age, intellectual, developmental, and physical disability, source of income and student status or other arbitrary reason.	No Conflict. The Project would create new residential units that would comply with all applicable laws regarding discrimination and inclusion.
Policy 4.1.1: Promote and facilitate equal opportunity practices in the construction, provision, sale and rental of housing.	No Conflict. The Project would create new residential units that would comply with all applicable laws, during both construction and operation, regarding equal opportunities, discrimination and inclusion.
Policy 4.3.2: Ensure that all neighborhoods have a range of housing typologies to provide housing options for residents to remain in the same community, when and if their needs change.	No Conflict. The existing neighborhood is defined mostly as commercial office buildings, with interspersed residential buildings ranging from new to many decades old. The new apartments created by the Project would add a new typology of housing unit to existing stock that would allow existing residents to remain in the area, or allow new residents to relocate to the area, to be part of the community. The Project provides new residential options for residents who live and work in the downtown area.
<i>Source: Eyestone Environmental, September 2023</i>	

CALGreen. These standards would reduce energy, water usage, and waste generation, thereby reducing associated GHG emissions and minimizing the impact on natural resources and infrastructure. Therefore, the Project would be consistent with the applicable objectives and policies set forth in the Housing Element.

Conservation Element

Section 5, Cultural and Historical, of the City's General Plan Conservation Element (Conservation Element) recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources

potentially affected by proposed land development, demolition, or property modification activities.¹⁰ As discussed in Appendix K and summarized in Section 3.3.6 below, SurveyLA identifies the Project Site, including the existing office tower and Plaza, as individually eligible for listing in the California Register of Historical Resources, and the office tower as individually eligible for designation as a Los Angeles Historic-Cultural Monument. However, the Project would not alter the office tower in any way, and approximately 89 percent of the main Plaza area would remain unaltered. The portion of the Plaza that would be altered by the Project would be replaced by new paving, hardscaping, and landscaping that would recreate the shape and dimensions of the existing design, thereby memorializing the original design and symmetry of the Plaza. Thus, the Project Site would retain integrity of location, design, setting, materials, workmanship, feeling, and association, and as a result, would continue to convey its original historic identity and significance. As such, the Project would not directly or indirectly impact historic resources, and thus, would not conflict with Section 5 of the Conservation Element. In addition, Section 15, Land Form and Scenic Vistas, of the Conservation Element, establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. The Project Site is located in an urbanized area and does not contain any significant land forms or unique scenic features. Thus, the Project would not conflict with Section 15 of the Conservation Element.

Health and Wellness Element

The Project would be consistent with the applicable goals and objectives of the Health and Wellness Element by generating new jobs, expanding housing opportunities, avoiding displacement of existing housing or populations, promoting healthy living, and integrating healthy building design and construction on a site that is proximate to public transit. The Project also includes pedestrian enhancements such as pedestrian walkways surrounding and within the Project Site that would provide better connections to existing and future transit stops. The Project would also provide bicycle parking and repair facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. Furthermore, the Project is estimated to generate lower VMT per capita than the average for the area. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element.

Central City Community Plan

The proposed land uses are consistent with the Project Site's Regional Center Commercial land use designation and would not require a General Plan Amendment or Zone Change. As discussed in Table 5 on page 42, the Project would be generally consistent with the objectives and policies that support the goals of the Community Plan. The Project would provide 366 residential units that range in type and size, thereby increasing the range of housing choices available to Downtown employees and residents. The Project would also maximize the use of existing open space areas by connecting the new residential uses to the open space Plaza, which would also create a connection between the proposed residential uses and the existing office uses. Additionally, the Project would accommodate pedestrian open space and usage and would contribute to an extensive, well-formed, and well-maintained pedestrian network. The Project would locate new housing in a manner that reduces

¹⁰ City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9, https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed May 3, 2022.

Table 5
Applicable Objectives and Policies of the Central City Community Plan

Objective/Policy	Would the Project Conflict?
Residential	
Goal 1: A safe, secure, and high-quality residential environment for all economic, age, and ethnic segments of the community.	No Conflict. The Project would create a high-quality residential environment for a range of economic, age, and ethnic segments of the community. The Project would do so by developing 366 rental units consisting of studio, one-, and two-, bedroom units. The Project would include amenities such as a pool and fitness room, as well as substantial on-site open space. The Project would also include numerous operational design features to enhance safety within the Project Site, including a 24-hour security camera network throughout the Project Site, controlling access to all buildings, and training staff on security policies for the Project's buildings. In addition, the Project would provide adequate lighting of the building and walkways to provide for pedestrian safety. The Project would also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, building entrances, spaces around buildings, and pedestrian walkways would be designed to be open and visible from surrounding sites. Thus, the Project would not conflict with this goal.
Objective 1-2: To increase the range of housing choices available to Downtown employees and residents. Policy 1-2.1: Promote the development of neighborhood work/live housing.	No Conflict. The Project would develop new housing opportunities with a range of options in Downtown Los Angeles, including 366 multi-family residential units consisting of studio, one-, and two-bedroom units. These units would be located on an urban infill site within a TPA and in close proximity to transit, near numerous job opportunities in the Downtown area. The Project would be located on a site that includes an approximately 1,331,394 square-foot office tower, which would create a positive work/live environment. Thus, the Project would not conflict with this objective and corresponding policy.
Objective 1.3: To foster development which can accommodate a full range of incomes.	No Conflict. The Project would support and not conflict with this Citywide objective by providing a range of apartment unit types, including studios, one-bedrooms, and two-bedrooms, which would accommodate individuals and families at different price points.
Policy 1-3.1: Encourage a cluster neighborhood design comprised of housing and services.	No Conflict. The Project would include residential uses on a single site that currently contains office uses, parking, and open space, which will remain. Furthermore, the Project Site is located within a dense urban area with many services, including transit, in close proximity. Thus, the Project would not conflict with this policy.
Open Space and Recreation	
Objective 4-1: To encourage the expansion and additions of open spaces as opportunities arise.	No Conflict. The Project would include 27,809 square feet of common open space within the Project Site, which would exceed LAMC requirements. This open space would include 22,693 square feet on the Plaza Level and 5,116 square feet on the rooftop amenity deck. Thus, the Project

Table 5 (Continued)
Applicable Objectives and Policies of the Central City Community Plan

Objective/Policy	Would the Project Conflict?
	would provide open space for both the public and residents of the Project. Thus, the Project would not conflict with this objective.
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. Policy 4-2.1: To foster physical and visual links between a variety of open spaces and public spaces Downtown.	No Conflict. The proposed residential building would be located on a small portion of the Project Site, thereby retaining much of the existing Plaza. The Plaza would be enhanced with additional landscape and hardscape features, and pedestrian access to the Plaza would be enhanced via a new stairway on the corner of Hope Street and 4th Street. The Project would include a café with outdoor seating at the Plaza Level, which would further maximize the use of this open space. Furthermore, the close proximity of the Project to existing transit would enable Project residents to easily access other open space and recreational facilities within the Central City Community Plan area as well as the larger region, and would allow off-site residents, employees and visitors to easily access the on-site open space. Thus, the Project would not conflict with this objective and corresponding policy.
Transportation	
Objective 11-3: To provide an internal circulation system with a focus of connecting specific pairs of activity centers to a system that provides greater geographic coverage of Downtown, thus giving Downtown travelers more choices and more flexibility.	No Conflict. The Project would provide a direct connection between the proposed residential uses and the existing office uses on the Project Site. Furthermore, the Project would incorporate stairway improvements at the corner of Hope Street and 4th Street that would facilitate pedestrian access to and across the Project Site. Thus, the Project would not conflict with this objective.
Objective 11-6: To accommodate pedestrian open space and usage in Central City.	No Conflict. As previously discussed, the Project would include pedestrian amenities and accessible sidewalks and walkways that would provide pedestrian access throughout the Project Site. Additionally, street trees would be included as part of the streetscape plan to provide adequate shade and a more comfortable environment for pedestrians. The large, landscaped plaza on the Project Site would further contribute to the inviting and comfortable pedestrian environment. The Project Site's proximity to multiple transit services would promote the use of transit and other alternative modes of transportation. Furthermore, the orientation of the Project would provide direct connection to the public right-of-way. Additionally all vehicular access to the Project Site would be separate from the pedestrian and bicycle access points. Thus, the Project would not conflict with this objective.
Source: Eyestone Environmental, May 2022	

vehicular trips because the Project would increase density on an urban infill site in Downtown Los Angeles within a City-designated TPA that is well-served by public transportation. In addition, the Project would provide housing on a site that already includes office uses, which may encourage

residential tenants to both live and work within the Project Site, thus reducing VMT. The Project would also foster development that can accommodate a range of incomes by providing apartment units that range in unit types and sizes. Thus, as outlined in Table 5 on page 42, the Project would not conflict with the applicable goals, objectives, and policies of the Community Plan.

3.2.1.3 Los Angeles Municipal Code

The Project Site is zoned C4-4D (Commercial, Height District 4, Development Limitations). Pursuant to the LAMC, the C4-4D Zone permits a wide array of commercial land uses including retail, office, hotels, schools, and parks, as well as any land uses permitted in the R4 (Multiple Residential) Zone, which includes one- and two-family dwelling units and apartment buildings. The proposed residential uses and ground-floor café would be permitted in the C4 zone. Height District 4 within the C4 zone does not impose any height limits but restricts development to a maximum FAR of 13:1. However, the general zoning contains a “D” limitation for 6:1 FAR.

Importantly, the limitation contains a grandfathering clause that allows increased floor area for sites with an approved Disposition and Development Agreement or Owner-Participation Agreement with the Community Redevelopment Agency/Los Angeles (“CRA/LA”), which applies to the Project Site. The City has confirmed the applicability of the grandfathered FAR rights and confirmed that the Project Site retains 288,606 square feet of floor area for future development.

3.2.1.4 Bunker Hill Specific Plan

The Project’s consistency with the applicable purposes of the Specific Plan is analyzed in Table 6 on page 45. As indicated therein, the Project would be consistent with the applicable Specific Plan purposes. With regard to the regulations outlined in the Specific Plan, as noted in Section 3 of the Specific Plan, whenever the Specific Plan contains provisions that are different from what is allowed pursuant to the provisions in the LAMC, the Specific Plan shall supersede the applicable provisions of the LAMC. In addition, Section 6.C., Director’s Determination for Alternative Design, of the Specific Plan, is the mechanism that allows the City to determine that a project complies with the applicable regulations of the Specific Plan even if its design elements do not strictly comply. Thus, the Project substantially complies with the applicable regulations of the Specific Plan, as discussed below.

Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations and Designation of Subareas, including regulations relating to FAR, permitted uses, setbacks, open space, and density. Section 7.B.1 of the Specific Plan states that FAR should be governed by the underlying zone and height district. As previously discussed, the Project is zoned C4-4D. The “D” designation limits FAR to 6:1. The “D” limitation is superseded, however, by the Bunker Hill Specific Plan’s FAR allowance for the Project Site. Pursuant to the Specific Plan, previous development capacities outlined in the former Bunker Hill Redevelopment Plan area remain in effect. The resulting floor area rights are included in Appendix A of the Specific Plan. Accordingly, Parcel I, which encompasses the Project Site, is allocated 1,620,000 square feet for development rights for the Project Site. Thus, as the project would result in a total of 1,618,502 square feet of floor area within the Project Site, including 1,331,394 square feet contained in the existing office tower and 309,160 square feet contained in the

Table 6
Project Consistency with Applicable Purposes of the Bunker Hill Specific Plan

Purpose	Would the Project Conflict?
A. Implement the Central City Community Plan.	No Conflict. The Project supports the implementation of the Central City Community Plan, as it is consistent with the land use programmed for the Project Site and is generally consistent with the Specific Plan.
B. Create a mixed use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment.	No Conflict. The Project would provide new multi-family residential housing opportunities and a ground-floor café that would be integrated with existing office and open space uses within a currently underutilized urban infill site. The Project would be located within the Bunker Hill area of Downtown Los Angeles and in close proximity to a mix of uses including residential, office, hotel, retail, and museums and other cultural facilities. Therefore, the Project would not conflict with this purpose.
F. Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces.	No Conflict. The Project would be located on a 4.21-acre urban infill site that currently consists of an office tower, a landscaped plaza, and a subterranean parking structure. The Project would be designed to complement the surrounding architecture while contributing a unique building to the urban fabric and skyline of Bunker Hill. In addition, the Project would preserve approximately 89 percent of the existing plaza on the Project Site and would incorporate improvements, including landscaping and a café with outdoor seating, to further enliven the public space. The additional of terraced steps at the corner of Hope Street and 4th Street would create open, pedestrian-friendly access to the Plaza Level and lobby area and would connect to new and existing pedestrian pathways within the existing park. Thus, the Project would not conflict with this purpose.
G. Expand, integrate, and active a linked network of public open spaces and pedestrian pathways.	No Conflict. The Project would provide a total of 27,809 square feet of open space, including 22,693 square feet of open space at the Plaza Level. As previously discussed, approximately 89 percent of the existing features within the Bank of America Plaza would remain, including the central water fountain and most of the landscaped lawn areas. The Project would add landscaping and gathering areas that would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. As previously discussed, the addition of terraced steps at the corner of Hope Street and 4th Street would further expand, integrate, and activate a linked network of public open spaces and pedestrian pathways. Thus, the Project would not conflict with this purpose.
H. Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use.	No Conflict. The Project Site is located within the Downtown Los Angeles in an area designed as a TPA and in close proximity to multiple transit opportunities. Thus, the residents of the Project would have easy access to multiple transit options. Therefore, the Project would not conflict with this purpose.
I. Create a transit-friendly environment by requiring conformance to pedestrian-oriented design guidelines that promote	No Conflict. As described in the discussion of the Project's consistency with the Specific Plan, due to constraints with the Project associated with the built-out nature of the site, the

Table 6 (Continued)
Project Consistency with Applicable Purposes of the Bunker Hill Specific Plan

Purpose	Would the Project Conflict?
consistent street walls and active ground floor uses.	creation of consistent street walls is not feasible. However, the Project would promote pedestrian activity by incorporating stairway improvements at the corner of Hope Street and 4th Street that would facilitate pedestrian access to and across the Project Site. In addition, the proposed residential building would incorporate transparent glazing at the ground floor to increase visibility from the public realm. In addition, the building lobby and café with outdoor seating would promote street and Plaza activity. Thus, the Project would not conflict with this purpose.
J. Ensure that private development implements special street standards developed for the area.	No Conflict. As analyzed in the Transportation Assessment included as Appendix B of this document, Hope Street, 3rd Street, and 4th Street have modified street standards as compared to the typical street designations of the Mobility Plan to reflect the unique nature of the Downtown Los Angeles street system. The Project Site frontages and adjacent street systems are unique, and include but are not limited to the following constraints: (a) the entire Flower Street portion of the Project Site is developed with a multi-level above- and below-grade parking structure, and it has a pedestrian and vehicular overpass bridging portions of it; (b) the Hope Street frontage connect to portions of the existing Plaza and then transition into utility infrastructure and the Metro Regional Connector; (c) 3rd Street is a bi-level street that terminates at the existing parking structure access point, while the lower portion of 3rd Street tunnels under Hope Street and beyond; and (d) the 4th Street frontage is a multi-level street with elevated ramping, through street portions, and sloping sidewalks adjacent to the parking podium. These conditions, make further improvements to these frontages physically infeasible and unnecessary to meet the City's mobility needs in this area. Furthermore, in most instances, the existing conditions and proposed conditions either satisfy or exceed the roadway and sidewalk spatial requirements of the Mobility Plan. In those limited instances where there is a deficiency in existing conditions (which for this Project are the same as the proposed conditions) the Project is seeking a waiver of dedications and improvements (filed as part of the Vesting Tentative Tract Map) to ensure the existing infrastructure continues to operate as designed and within the adequate capacities analyzed in this document and in the Transportation Assessment. Thus, the Project would not conflict with this purpose.
K. Support the improvement of the business environment by providing an attractive public realm.	No Conflict. The Project would cite the residential structure such that it would have minimal impact on the Plaza. Thus, the Plaza would remain a focal point and would further activate the public realm by the inclusion of additional landscaping and pedestrian amenities. In addition, the ground-floor café and outdoor patio would promote street and plaza activation, as the amenities would be accessible to both on-site tenants and the public. Furthermore, the Project has been designed to promote pedestrian activation along the corner of Hope Street and 4th Street, where a new terraced stairway would

Table 6 (Continued)
Project Consistency with Applicable Purposes of the Bunker Hill Specific Plan

Purpose	Would the Project Conflict?
	facilitate pedestrian access to the Project and across the greater Project Site. In addition, the residential tower would incorporate transparent glazing at the ground floor to increase visibility from the public realm. Thus, the Project would not conflict with this purpose.
L. Promote increased flexibility in the regulation of the height and bulk of buildings as well as the design of sites and public streets in order to ensure a well planned mix of commercial and residential uses with adequate public space.	No Conflict. The Project is substantially consistent with the Specific Plan regulations. Consistent with the Specific Plan, the Project would result in a mix of office and residential uses on a single site and would provide 27,809 square feet of common open space areas. The Project maximizes the density and FAR contemplated by the Specific Plan for the Project Site and utilizes public open space to activate the pedestrian realm and provide functional connections within and across the Project Site. Thus, the Project would not conflict with this purpose.
<i>Source: Eyestone Environmental, May 2022.</i>	

proposed residential tower, the Project would comply with Section 7.B.1 of the Specific Plan. Furthermore, the proposed residential uses with a ground-floor café and open spaces are permitted by the Specific Plan.

With regard to yard and setback requirements included in Section 7.E of the Specific Plan, due to constraints associated with the Project Site's fully developed conditions (i.e., the existing below- and at-grade infrastructure on the Project Site), compliance with these requirements is infeasible. Thus, the City, in its discretion as Lead Agency, is using the mechanism provided for in the LAMC and Specific Plan that provide relief from the setback requirements, as outlined in Section 2.4 above, while still ensuring Specific Plan consistency due to the existing infrastructural constraints around the Project Site. With the requested Directors Determination for Alternative Design and waiver of dedication and improvement (filed as part of the Vesting Tentative Tract Map) requests, the Project would be consistent with Section 7.E of the Specific Plan.

Pursuant to open space requirements outlined in Section 7.F of the Specific Plan, the Project requires a minimum of 9,838 square feet of common open space and 4,919 square feet of planted open space area. As previously described, the Project would provide a total of 27,809 square feet of common open space and 15,143 square feet of landscaped open space, which would exceed the Specific Plan requirement.

Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations, including regulations relating to setbacks, ground floor treatment, and massing and street wall. Section 8.B.1 of the Specific Plan (Section 3.B of the Downtown Design Guide) regulates setbacks in the Specific Plan area. For retail streets, the Specific Plan and Downtown Design Guide requires the building wall along the sidewalk (street wall) be located at or within 5 feet of the back of the minimum average sidewalk width required

by the Downtown Street Standards (discussed in Subsection 3.2.1.5, below). The Specific Plan limits the distance between the sidewalk and the street wall to promote access and pedestrian activation on the ground floor fronting designated retail streets. The Downtown Design Guide requires 0-foot to 5-foot setbacks for retail and 0-foot to 10-foot setbacks for live/work on non-retail streets. The Downtown Street Standards require a 10-foot wide sidewalk followed by a 5-foot sidewalk easement on Hope Street. The Project substantially complies with all Specific Plan regulations regarding the remaining setback requirements of section 8.B.1 of the Specific Plan and has included architectural designs and/or details which conform to the purposes and intent of the urban design guidelines required by Section 8. No detrimental effects have been identified from these alternative design elements on the public right-of-way or surrounding properties. As such, the Project satisfies these requirements of the Specific Plan. The Project ground floor would be largely improved with a residential lobby, mailroom, parcel lockers, package room, storage, and small café. The Project's ground floor street wall is set back approximately 16.5 feet from the Hope Street property line, which would not be located "at or within 5 feet of the back of the sidewalk easement." On 4th Street, the Project is setback 30 feet 3 inches, which would comply with requirements for non-retail streets. The Project would also promote pedestrian activity at the corner of 4th Street and Hope Street. The existing condition at that corner restricts site access, and the pedestrian stairs from 4th Street are obscured by an intervening street wall. New stairway improvements at the corner that would be included as part of the Project would facilitate pedestrian access to and across the Project Site. In addition, the proposed residential building would incorporate transparent glazing at the ground floor to increase visibility from the public realm. In addition, the building lobby and café with outdoor seating would promote street and Plaza activity. Thus, the Project would conform with the purposes and intent of the urban design regulations required by Section 8.B.1 of the Specific Plan.

Section 8.B.2 of the Specific Plan (Section 4.B of the Downtown Design Guide) regulates ground floor treatment in the Specific Plan area. Due to site constraints, the Project cannot satisfy the requirement that the retail street (Hope Street) and non-retail street (4th Street) be designed with at least 75 percent of active uses.¹¹ Because the Project is only physically disturbing a small portion of the overall Project Site, the existing conditions along Hope Street remain in the existing condition. The portion of the Development Site that fronts Hope Street is largely designed with active uses as more broadly defined by the Downtown Design Guide, which includes building lobby, courtyards, and cafés. This Project frontage on Hope Street only comprises approximately 31 percent of the length of Hope Street and only 49 percent of the length of 4th Street. The Development Area frontages would be improved and the Project would integrate active uses in this area and further stimulate pedestrian experiences along the frontage more so than occurs in the existing condition. As such, the Project would create a pedestrian-oriented experience along Hope Street through ground floor activating uses and overall design elements.

Section 8.B.3 of the Specific Plan sets forth regulations for massing and street walls, which addresses the building scale experienced by pedestrians from the public realm and the building wall coverage along sidewalks. According to the Specific Plan, retail streets should be constructed with a minimum of 80 percent of their street frontage lined with a street wall at the back of a setback, with a minimum street wall height of 25 feet. Non-retail streets are required to have 70 percent of their frontage lined with street wall, with a minimum height of 25 feet. Based on Project Site constraints, and the

¹¹ The Specific Plan identifies retail, professional office, and live/work uses as active uses, while the Downtown Design Guide uses a more broad definition.

mechanisms permitted in the Specific Plan and LAMC, the Project implements an alternative design that satisfies the massing, street wall and building scale experience as determined by the Director along Hope Street (retail street) and 4th Street (non-retail street). Along Hope Street, the Project would comply with the street wall requirements across 62 percent of its frontage. Along this portion, 31 percent of the frontage projects no more than 4 feet over the property line and another 31 percent of the frontage is within the required street wall range. As previously described, the Project would only physically disturb the southeast quadrant of the Project Site, with the remainder of the Project Site remaining untouched, including Hope Street and 4th Street frontages. The majority of the Hope Street frontage would remain in place, except for pedestrian enhancements that would improve accessibility and pedestrian engagement at the corner of Hope and 4th Streets.

Pedestrian Plan Regulations

Section 9 of the Specific Plan establishes a plan for an integrated network of linkages throughout the Specific Plan area. As shown in Map C of the Specific Plan, there are no future connections required to be constructed on the Project Site. By providing much-needed residential uses in the heart of Bunker Hill, along with open space and pedestrian amenities, the Project would encourage pedestrian activity and reduce VMT, thus making the neighborhood and surrounding areas more pedestrian-friendly. In addition, by providing residential uses on the same site as office uses within the Bank of America Tower, which are connected via the landscaped Plaza, the Project would further facilitate pedestrian activity.

Transportation and Parking Regulations

Section 10 of the Specific Plan contains transportation and parking regulations, which supersede the transportation and parking requirements set forth in the LAMC Section 12.21. Pursuant to the Specific Plan, projects located within 1,500 feet of a fixed rail transit station are required to provide a minimum of 0.25 space per unit for residential units with less than two habitable rooms, and 0.5 space per unit for all other units. The Development Site is located approximately 1,000 feet from the 2nd Place/Hope Street Regional Connector Station. Thus, accordingly, the Project would be required to provide a minimum of 183 parking spaces. In addition, the Project would be required to maintain the Code-required parking for the existing office building. According to the office building's Certificate of Occupancy from 2000, 1,479 parking spaces are required for the office uses. The existing subterranean parking structure on the Project Site provides 2,185 parking spaces. Thus, the approximately 183 parking spaces required for the Project could be easily accommodated within the existing parking garage while maintaining a minimum of 1,479 parking spaces for the existing commercial uses.

Overall, as outlined above, the Project would be consistent with the applicable purposes of the Bunker Hill Specific Plan. Furthermore, the Project would substantially comply with the Specific Plan's requirements regarding density, uses, lot area, open space, pedestrian area, and parking. The Project is seeking approval of a Directors Determination for Alternative Design as permitted by Bunker Hill Specific Plan and Vesting Tentative Tract Map (including a waiver of dedication and improvement) requests to facilitate the unique design of the Project within the context of the existing constraints of the Project Site. With these approvals and interpretations of the Specific Plan, the Project would comply with applicable Specific Plan regulations.

3.2.1.5 Downtown Street Standards

The Project Site is bounded by four public streets carrying the following designations assigned by the Mobility Plan: Hope Street—Modified Avenue I; 3rd Street—Modified Avenue II; Flower Street—Avenue I; and 4th Street—Modified Avenue I. Section 2.J of the Bunker Hill Specific Plan identifies that a purpose of the Specific Plan is to ensure new development implements all applicable street standards. Section 8.A of the Specific Plan requires compliance with the Downtown Street Standards to be verified during review of an application for a Project Permit Compliance. Accordingly, the Land Development Section of the Central District of the Bureau of Engineering prepared an interdepartmental transmittal to identify the dedication and improvements required in conjunction with the Project. To meet the Downtown Street Standards, a variable width dedication of up to 12 feet along Hope Street for the purposes of sidewalk widening, a variable width dedication of up to 4.5 feet along 3rd Street for the purposes of sidewalk widening, new corner cut dedications at Flower Street/3rd Street, Hope Street/3rd Street, and Hope Street/4th Street, replacement of sidewalks to achieve ADA compliance, and reconfiguration of multiple curb ramps and driveways along Flower Street, Hope Street, 3rd Street, and 4th Street are required. In addition, the Downtown Street Standards require additional improvements as follows: 3-foot average sidewalk easement on Flower Street; 5-foot average sidewalk easement on Hope street; 6-foot sidewalk easement on 3rd Street; and a 3-foot sidewalk easement on 4th Street.

The Project proposes to maintain the existing ROW configurations along all four street frontages and intersection corners. The adjoining frontages will be compliant with all applicable street standards except for the above-referenced sidewalk easements, along with a 12-foot ROW width deviation on Hope Street and a 4.5-foot ROW deviation for a portion of 3rd Street. Specifically, at- and above-grade, the areas identified for dedication are currently publicly accessible and improved with sidewalk and landscaping on private property. However, below-grade the existing subterranean automobile parking garage occupies the areas identified for dedication. No change to existing conditions are proposed related to the envelope of the subterranean parking garage in conjunction with the Project. Implementation of the BOE's dedication requirements and the Downtown Street Standards' sidewalk easement requirements would therefore be physically infeasible due to the presence of the existing parking garage, which will remain. Further, the BOE is requesting replacement of sidewalks, driveways, and curb ramps to meet the current respective standard plans. These surfaces are improved with decorative pavers in lieu of standard concrete. The Project will maintain these existing decorative pavers, which are the predominant materials used both adjoining the Project Site and in the surrounding Bunker Hill vicinity.

3.2.1.6 Conclusion

Based on the above, the Project is consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designations and regulations, and therefore, is consistent with the condition per CEQA Section 15332(a).

3.2.2 Consistency with CEQA Section 15332(b): The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The Project Site consists of a total of 4.21 acres (183,524 square feet), with the Development Area consisting of a relatively small portion of the Project Site, encompassing 24,274 square feet in the

southern portion of the Project Site. The Project Site is located within the Bunker Hill neighborhood of the City of Los Angeles, which is characterized by a variety of dense urban uses including high-rise buildings containing residential, office, and hotel uses with a variety of ground-floor commercial uses, as well as museum and cultural facilities. Thus, the Project is consistent with the condition per CEQA Section 15332(b).

3.2.3 Consistency with CEQA Section 15332(c): The project site has no value as habitat for endangered, rare or threatened species.

The Project Site is located in an urbanized area and is currently developed with a high-rise office tower, an outdoor plaza, and a parking structure that is located beneath most of the Project Site. Landscaping within the Project Site is limited to ornamental trees and common grasses and shrubs, and there are no large expanses of open space areas in the Project vicinity. No riparian or other sensitive natural community exists on the Project Site, and the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area.^{12,13,14,15} In addition, there are no other sensitive or natural communities on identified by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS) on the Project Site.^{16,17,18}

As provided in the Tree Inventory Report prepared by Carlberg Associates, dated August 2021 and included as Appendix A of this document, there are 106 trees located within the Project Site and 30 trees located along Hope Street adjacent to the Development Area, all of which are non-native/non-protected. The Project would require the removal of 20 of the on-site trees and seven of the City right-of-way street trees. The Project would preserve approximately 89 percent of the existing landscaping on the Plaza and would incorporate new landscaping including trees and hedges, planters, and lawn areas. Additionally, street trees would be replaced on a 2:1 ratio in accordance with the requirements of the Los Angeles Bureau of Street Services, Urban Forestry Division.

Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. In addition, with regard to tree removal, the Project would comply with the Migratory Bird Treaty Act (MBTA) as well as, California Fish &

¹² California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) <https://apps.wildlife.ca.gov/bios/>, accessed May 3, 2022.

¹³ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed May 3, 2022.

¹⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4, <https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf>, accessed May 3, 2022.

¹⁵ Los Angeles County, Department of Regional Planning, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015, https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf, accessed May 3, 2022.

¹⁶ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://map.dfg.ca.gov/bios/>, accessed May 3, 2022.

¹⁷ California Department of Fish and Wildlife, CDFW Lands, <https://map.dfg.ca.gov/lands/>, accessed May 3, 2022.

¹⁸ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed May 3, 2022.

Game Code Section 3503 regarding the protection of migratory bird species. The MBTA prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” While the Project would require the removal of existing trees, which could potentially provide nesting sites for migratory birds, compliance with the MBTA, California Fish and Game Code, and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. Any tree removal would be minimized and performed outside of the bird nesting season (typically February 1 to August 31) to the extent feasible. In the event removal of trees must be conducted during the bird nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. In the event active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. Through this regulatory compliance, the Project would not harm any protected migratory bird species.

In any case, the Project has no value as habitat for endangered, rare, or threatened species and the Project is consistent with the condition per CEQA Section 15332(c).

3.2.4 Consistency with Section 15332(d): Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

3.2.4.1 Traffic

The Project’s potential impacts related to transportation were analyzed in the Transportation Assessment prepared by Gibson Transportation Consulting Inc, dated February 2022, which is included as Appendix B of this document. The assessment was reviewed and approved by the LADOT on May 13, 2022 (refer to Appendix C).

Under Senate Bill (SB) 743, which went into effect in January 2014, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a measurement that better addresses the State’s goals on reduction of greenhouse gas (GHG) emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS. The LADOT TAG defines the methodology for analyzing a project’s transportation impacts in accordance with SB 743. Per the TAG, the CEQA transportation analysis contains the following threshold for identifying impacts:

Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies.

Threshold T-2: Causing a Substantial VMT.

Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use.

Pursuant to the LADOT TAG, projects should be analyzed to identify potential conflicts with programs, policies, plans, or ordinances that are adopted to protect the environment. Pursuant to the TAG, in general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT.¹⁹ Each of the documents listed in the TAG was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project's conformance or non-conformance with each. A detailed outline of the Project's consistency with these policies is included as Appendix C of the Transportation Assessment, which is included as Appendix B of this document.

Mobility Plan 2035

The Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

1. **Safety First:** Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. **World Class Infrastructure;** A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. **Access for All Angelenos:** A fair and equitable system much be accessible to all and must pay particularly close attention to the most vulnerable users.
4. **Collaboration, Communication, and Informed Choices:** The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. **Clean Environments and Healthy Communities:** Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are provided in Table 5 of Transportation Assessment included as Appendix B of this document, along with a detailed discussion of the Project's consistency with each. A summary of the analysis from the Transportation Assessment is provided below.

The Mobility Plan identifies key corridors within the Project Study Area as components of various "mobility-enhanced networks." Though no new specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would not preclude the City from implementing any Mobility Plan improvements.

¹⁹ Los Angeles Department of Transportation, Transportation Assessment Guidelines, July 2020, https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf, accessed May 17, 2022.

Separate pedestrian and bicycle access to the Project Site would be provided via entrances along Hope Street. With development of the Project, enhanced pedestrian access would be provided at the corner of Hope Street and 4th Street, where the Project would remove existing landscaped planters to provide terraced steps that would create open, pedestrian-friendly access to the Project Site and would activate new and existing pedestrian walkways within the Project Site. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways do not cross any existing or planned bicycle facility. As discussed in Section 2.3, Project Description, of this document and in the Transportation Assessment included as Appendix B, the Project is requesting a Vesting Tentative Tract Map, which includes waivers of dedication and improvement along the Flower Street, 4th Street, Hope Street, and 3rd Street Project frontages pursuant to LAMC Section 12.37 I.3. Due to the on-site and off-site conditions, dedications and improvements are physically infeasible and unnecessary to meet the mobility needs of the City in this area. In more instances around the Project Site, the existing and proposed conditions already meet the standards of the Mobility Element. In addition, the Project only proposes development within the southeast quadrant of the Project Site at the corner of Hope Street and 4th Street (Development Area) and the existing conditions along the Project frontages would remain largely unchanged. The Project would not preclude the City from implementing future improvements and the adjacent streets would continue to serve the mobility needs of the City. Thus, the Project Site would continue to provide safe access for all users regardless of mode choice and would not conflict with the Safety First objective of the Mobility Plan.

As part of the Project's infrastructure, the design integrates with the pedestrian and bicycle connectivity that currently exist on the Project Site and surrounding street frontages. In addition, the Project would provide an enhanced pedestrian entry at the corner of Hope Street and 4th Street that would connect to new and existing pedestrian pathways within the Project Site. The Project would use the existing functional vehicle driveways and would not result in new vehicle driveways to access the Project Site.

The Project Site is not located along street segments identified in the Neighborhood Enhanced Network (NEN) or Transit Enhanced Network (TEN) and, thus, the Project would not interfere with future improvements to existing or future neighborhood character or transit services in the area.²⁰ Truck loading areas would be separated from pedestrian and bicycle interaction and would be accommodated completely on-site within the existing parking infrastructure, with access to the loading areas provided via 4th Street. The Project would not affect any of the existing driveway and roadway widths and would not preclude future roadway improvements proposed in the Mobility Plan. Therefore, the Project would not conflict with the infrastructure goals of the Mobility Plan.

The Project is also committed to encouraging multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project would provide short- and long-term bicycle parking to encourage non-motorized travel. The Project promotes transit usage by developing a

²⁰ The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. Hill Street south of 4th Street and Hope Street south of 5th Street within the Project Area are designated as part of the NEN network. The TEN aims to improve existing and future bus services through reliable and frequent transit service to increase transit ridership, reduce single-occupancy vehicle trips, and integrate infrastructure investments within the surrounding street system. 5th Street within the Project area is designated as part of the TEN.

mixed-use residential project located within 0.25 mile of the Metro B/D Line Pershing Square Station and Metro Regional Connector Grand Avenue Arts/Bunker Hill Station and is adjacent to several Metro bus stops along Flower Street and Hope Street. The Project would also support residents, employees, and visitors who choose to travel by automobile through the provision of driveways along Flower Street and Hope Street, on-site passenger loading, separate commercial loading on 4th Street, and adequate parking supply to serve demand. All sidewalks, curb ramps, and passages along the Project frontage would meet American with Disability Act (ADA) standards, providing accessibility for all. In addition, the Project would facilitate a walkable environment by placing additional residential units in proximity to jobs, destinations, and the multitude of neighborhood services available in Downtown Los Angeles.

Furthermore, sufficient off-street parking would be provided, consistent with the land use objectives and estimated parking demand. The Project would also maintain existing on-street parking around the Project frontages. Thus, the Project would not conflict with the Collaboration, Communication, and Informed Choices goal of the Mobility Plan.

To respond to the Mobility Plan objective of providing clean environments and healthy communities, the Project would promote interaction between its residential units and existing commercial uses on-site, as well as other nearby downtown attractions, thereby reducing the overall distances traveled by vehicle. Additionally, the design encourages active transportation for a healthier lifestyle by supporting bicycling and walking, which contribute to individual health as well as a reduction of vehicle pollutants. Thus, overall, the Project would not conflict with the applicable goals of the Mobility Plan and would not preclude the implementation of future improvements of the Mobility Plan.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of the Plan for a Healthy Los Angeles focus on health and wellness through increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table 6 of the Transportation Assessment included as Appendix B of this document. In summary, the Project would promote healthy living where active travel modes are encouraged. The Project would support multi-modal mobility options to improve the convenience of making trips without the use of a personal automobile. The Project includes pedestrian enhancements such as pedestrian walkways surrounding and within the Project Site that would provide better connections to existing and future transit stops. The Project would also provide bicycle parking and repair facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. The Project would expand residential opportunities in proximity to commercial areas, destinations, and other neighborhood services in a diverse urban area. The Project would not displace any existing housing, and instead, would add 366 dwelling units to the City's housing stock. Finally, the Project is estimated to generate lower VMT per capita than the average for the area, as demonstrated below. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG emissions per capita.

The Project prioritizes safety and access for all individuals utilizing the Project Site and does not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Therefore, the Project is consistent with and would not obstruct the implementation of the policies recommended by the Plan for a Healthy Los Angeles.

Central City Community Plan

A detailed analysis of the Project's consistency with the transportation-related policies in the Central City Community Plan is provided in Table 7 of the Transportation Assessment, included as Appendix B. In summary, the Project would expand housing opportunities near accessible transit and locate new residential land uses adjacent to several existing commercial and retail establishments, which contributes to the creation of an active downtown destination. The Project would also integrate with existing open spaces on the Project Site and enliven those spaces while concurrently supporting high levels of transit use with nearby transit centers and facilitating accessible employment opportunities in the adjacent commercial buildings. The Project would incorporate a commercial use on the ground floor fronting adjacent streets, provide bicycle parking and amenities on-site, and enhance existing pedestrian activity by providing terraced steps at the corner of Hope Street and 4th Street to create open, pedestrian-friendly access to the Plaza Level and lobby area and connectivity to new and existing pedestrian pathways within the Project Site. Furthermore, the Project Site is near multiple transit options that would encourage residents, employees, and patrons of the Project to utilize alternative modes of travel.

The Project would actively promote pedestrian activity and engagement with the surrounding community and would not hinder other goals and policies identified in the Community Plan. Therefore, the Project would be consistent with, and would not obstruct the implementation of the policies recommended by, the Community Plan.

Bunker Hill Specific Plan

As previously discussed, the Project would be consistent with the permitted land uses identified in the Specific Plan, including multi-family residential, commercial, and public open spaces. The Project would locate new residential land uses adjacent to several existing and proposed commercial office and retail establishments, creating an active downtown destination. As previously discussed, the Project would also integrate with existing open spaces and pedestrian walkways on the Project Site that connect to nearby transit centers to create a transit-friendly environment. The Project would maintain existing Project frontages and pedestrian sidewalks adjacent to the Project Site and pedestrian walkways throughout the Project Site. The Project would also provide the minimum parking required by the Specific Plan. Thus, the Project would not conflict with the Bunker Hill Specific Plan.

LAMC

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. As outlined in Table 15 of the Transportation Assessment, The Project's bicycle parking requirement is 189 spaces (169 long-term and 20 short-term). The Project would provide 189 bicycle parking spaces (including 169 long-term and 20 short-term spaces) to satisfy the LAMC requirements for on-site bicycle parking supply.

Vision Zero Action Plan/Vision Zero Corridor Plan

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025 through a number of strategies, including modifying the design of streets to increase safety. Vision Zero implements projects that are designed to increase safety for the most vulnerable road users. The City has identified numerous streets as part of the High Injury Network (HIN), which is a network of streets where strategic investments will have the biggest impact on reducing death and severe injury. The City has also created an Action Plan identifying the types of improvements that will be implemented. The Project Site is not located adjacent to any streets identified in the City's HIN and no Vision Zero Safety Improvements are planned in the vicinity. The Project improvements to the pedestrian environment would not preclude future Vision Zero Safety Improvements by the City. Thus, the Project would not conflict with Vision Zero.

Citywide Design Guidelines

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. As previously discussed, the Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Per the TAG, the Pedestrian-First Design policies are applicable to this analysis. The Pedestrian-First Design approach focuses on design strategies that "create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting eyes and feet on the street." The Pedestrian-First Design guidelines are as follows:

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

A detailed analysis of the Project's consistency with the transportation-related policies in Citywide Design Guidelines is provided in Table 9 of the Transportation Assessment, included as Appendix B. In summary, the Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site; and well-designed vehicular access driveways in accordance with the City's design considerations. Additionally, street trees would be included as part of the streetscape plan to provide adequate shade and a more comfortable environment for pedestrians. The large, landscaped plaza on the Project Site would further contribute to the inviting and comfortable environment. The Project Site's proximity to multiple transit services would promote the use of transit and other alternative modes of transportation. Furthermore, the orientation of the Project would provide direct connection to the public right-of-way. All vehicular access to the Project Site would be separate from the pedestrian and bicycle access points. Thus, the Project would align with the

Pedestrian-First Design approach of Citywide Design Guidelines to provide a safe, comfortable, and accessible experience for all transportation modes, and the Project would be consistent with the applicable policies of the Design Guidelines.

Threshold T-2: Causing a Substantial VMT.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG (July 2019, updated July 2020), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG identifies distinct thresholds regarding significant VMT impacts for the seven Area Planning Commission (APC) areas in the Los Angeles. The Project Site is located within the Central APC, for which the following thresholds have been established:

- Household VMT per Capita: 6.0
- Work VMT per Employee: 7.6

Per the VMT Calculator User Guide (May 2020), work VMT per employee is not reported for projects with local-serving commercial uses (i.e., commercial uses less than 50,000 square feet). The Project would include a small-scale commercial component consisting of a 425-square-foot café that would serve the local area and would have far less than 50,000 square feet of floor area, and thus would have a negligible effect on regional VMT. The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The land use inputs included 366 multi-family housing units and 425 square feet of high-turnover restaurant uses. Based on the Project's land uses and location, assumptions were identified in the VMT Calculator, which are outlined in Table 10 of Transportation Assessment included as Appendix B of this document. Applying these assumptions, the Project is estimated to generate 2,772 daily household VMTs, resulting in a daily household VMT per capita of 3.4. The average household VMT per capita would not exceed the Central APC significance household impact threshold of 6.0 and, therefore, the Project would not result in a significant VMT impact. Furthermore, the Project is well-served by public transit, including the Metro portal located less than 0.25 mile east of the Project Site.

Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use.

Pursuant to the TAG (Threshold T-3) the determination of significance regarding the hazards due to a geometric design feature or incompatible uses should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions such as curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program. Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or

vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections.

Further evaluation is required for projects that that require a discretionary action and (1) propose new driveways or introduce new vehicle access to the property from the public right-of way or (2) propose any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.). As previously discussed, the Project involves development in only a small portion of the overall Project Site and the Project would utilize existing vehicle access to the Project Site. As such, the Project does not result in a need for modification to the public right-of-way. That intentional design approach (i.e., minimal disruption of existing conditions and adjacent frontages) substantially reduces hazards that could result from design features. Also, the Project is requesting a Vesting Tentative Tract Map, which includes waiver of dedication/improvement along all Project frontages, thereby avoiding the introduction of new design features that could be hazardous. Therefore, further evaluation related to Threshold T-3 is not required for the Project. Nevertheless, an evaluation was conducted and is provided for informational purposes only in the Transportation Assessment and the analysis determined that the Project would not substantially increase hazards due to a geometric design feature or incompatible uses.

Conclusion—Traffic

Overall, based on the above, approval of the Project would not result in any significant effects relating to traffic.

3.2.4.2 Noise

The Project's potential impacts related to noise were analyzed by estimating future noise and vibration levels at surrounding sensitive land uses associated with construction and operation of the Project and determining whether Project-related noise would: (a) result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or (b) result in generation of excessive groundbourne vibration or groundbourne noise levels. Supporting noise modeling worksheets are included in Appendix D of this document.

- a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Applicable Noise Regulations

Chapter XI, *Noise Regulation*, of the LAMC (hereafter referred to as the Noise Regulations) establishes acceptable ambient sound levels to regulate intrusive noises (e.g., noise from stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulations, a noise level increase from certain regulated noise sources (e.g., mechanical equipment) of 5 dBA over the existing ambient noise level at an adjacent property line is considered a violation of the Noise Regulations. To account for people's increased tolerance for short-duration noise events, the Noise Regulations provide a

5-dBA allowance (for a total of 10 dBA²¹ above the existing ambient noise level) for noise sources occurring for more than 5 but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.²²

Ambient noise is defined by the Noise Regulations as the measured noise level averaged over a period of at least 15 minutes (i.e., L_{eq}).^{23,24} For purposes of determining whether or not a violation of the Noise Regulations is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for the M3 zone is 65 dBA and 65 dBA, respectively.²⁵

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.²⁶ In addition, Section 112.05 of the LAMC limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.²⁷

Noise due to motor driven vehicles on private property (e.g., parking lot) is regulated under Section 114.02 of the LAMC. In accordance with Section 114.02, the operation of motor driven vehicles upon any property within the City that causes the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

Noise due to vehicle theft alarm systems (car alarms) is regulated under Section 114.06 of the LAMC, which states that "it shall be unlawful for any person to install, operate or use any vehicle theft alarm

²¹ A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear. All sound levels measured in decibel (dB or dBA), as identified in the noise calculation worksheets included in Appendix D of this document, are relative to 2×10^{-5} N/m². Caltrans, Technical noise Supplement (TeNS), September 2013, Chapter 2.1.3.2.

²² Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

²³ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.01(a).

²⁴ Equivalent Sound Level (L_{eq}) is a measurement of the acoustic energy content of noise averaged over a specified time period. Thus, the L_{eq} of a time-varying sound and that of a steady sound are the same if they deliver the same amount of energy to the receptor's ear during exposure. Caltrans, Technical noise Supplement (TeNS), September 2013, Table 2-11.

²⁵ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

²⁶ Los Angeles Municipal Code, Section 41.40.

²⁷ In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.”

In addition to the Noise Regulations, the Noise Element of the City of Los Angeles General Plan Exhibit I establishes CNEL guidelines for land use compatibility.²⁸ Per the Noise Element, noise levels between 70 and 75 dBA CNEL are considered “normally unacceptable” and noise levels at 75 dBA CNEL and greater are considered “clearly unacceptable” for residential uses. Noise levels between 55 and 70 dBA CNEL are considered “conditionally acceptable” and noise levels less than 55 dBA CNEL are considered “normally acceptable” for single-family residential uses.

The Noise Regulations limit noise from construction equipment located within 500 feet of a residential zone to 75 dBA, as measured at 50 feet from the source. However, as stated above, a significant impact would occur if the Project would result in a substantial temporary or permanent increase in ambient noise levels. With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the City has determined to assess the significance of the Project’s construction noise based on whether Project construction creates an increase in the ambient exterior noise levels of 5 dBA (hourly L_{eq}) or more at a noise-sensitive use (see below discussion for definition of noise-sensitive use).

With respect to on-site operation noise, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the Noise Regulations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the City has determined to assess the significance of the Project’s off-site traffic noise based on whether the Project creates, or contributes to, an increase in the ambient noise level of 3 dBA in CNEL if the noise levels fall within the “normally unacceptable” or “clearly unacceptable” category, as specified in the City’s Noise Element, or an increase of 5 dBA in CNEL if the noise levels fall within the “conditionally acceptable” or “normally acceptable” category at noise-sensitive uses. In addition, the City has determined to assess the significance of the Project’s composite noise levels (on-site and off-site sources) based on whether the Project’s composite noise levels create an increase in the ambient noise level of 3 dBA or 5 dBA in CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall) at noise-sensitive uses.

Existing Noise Environment

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. Similarly, the Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.²⁹ Based on a review of the land uses in the Project Site area, there are noise sensitive uses within 500 feet of the Project Site, including multi-family residential, hotel, and school uses. Four off-site noise receptor locations were selected, representing the nearest noise

²⁸ Noise Element of the Los Angeles City General Plan, adopted February 3, 1999.

²⁹ City of Los Angeles General Plan, Noise Element, Chapter IV, p. 4-1.

sensitive (residential, hotel, and school) uses surrounding the Project Site, and two on-site locations. The locations of these noise receptors are identified in Figure 8 on page 63 as R1 through R4 (off-site noise sensitive receptors) and P1 and P2 (on-site locations), and described in Table 7 on page 64.

Ambient noise measurements were taken at the four selected off-site noise sensitive receptors and two on-site locations on December 1, 2021, using a Larson-Davis Model 870 and a Quest Technologies Model 2900 Integrating/Logging Sound Level Meters. A 24-hour measurement was conducted at receptor P1. Two 15-minute measurements were conducted at each of the off-site receptor locations (R1 through R2) and the on-site receptor location P2, one during the daytime hours (between 10:00 A.M. and 12:00 P.M.) and one during the nighttime hours (between 10:00 P.M. and 12:00 A.M.). The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.³⁰

The results of the ambient sound measurement data are summarized in Table 7. As indicated in Table 7, the existing daytime ambient noise levels surrounding the Project Site ranged from 59.7 dBA (L_{eq}) at receptor P2 to 67.9 dBA (L_{eq}) at receptor R2. The nighttime ambient noise levels ranged from 55.4 dBA (L_{eq}) at receptor P2 to 63.9 dBA (L_{eq}) at receptor R2. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Hope Street, Figueroa Street, 3rd Street, and 4th Street. Consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the nearest off-site sensitive receptor locations and comparing these estimated construction-related noise levels to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was projected based on the noise expected to be generated by the different types of Project construction activities anticipated, calculating the anticipated noise levels to be produced by the mix of the Project's construction equipment inventory assumed for all construction activities at the two future potential sensitive receptor locations, construction durations, and construction schedule. Project construction is anticipated to span 40 months and to be completed in 2026). Project construction activities would comply with LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

On-Site Construction Noise

As reported in Appendix D, the individual pieces of construction equipment anticipated to be used for Project construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table 8 on page 65. The construction equipment noise levels at a distance of 50 feet (Referenced Maximum Noise Levels) are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM, 2006),

³⁰ LAMC Section 111.01.

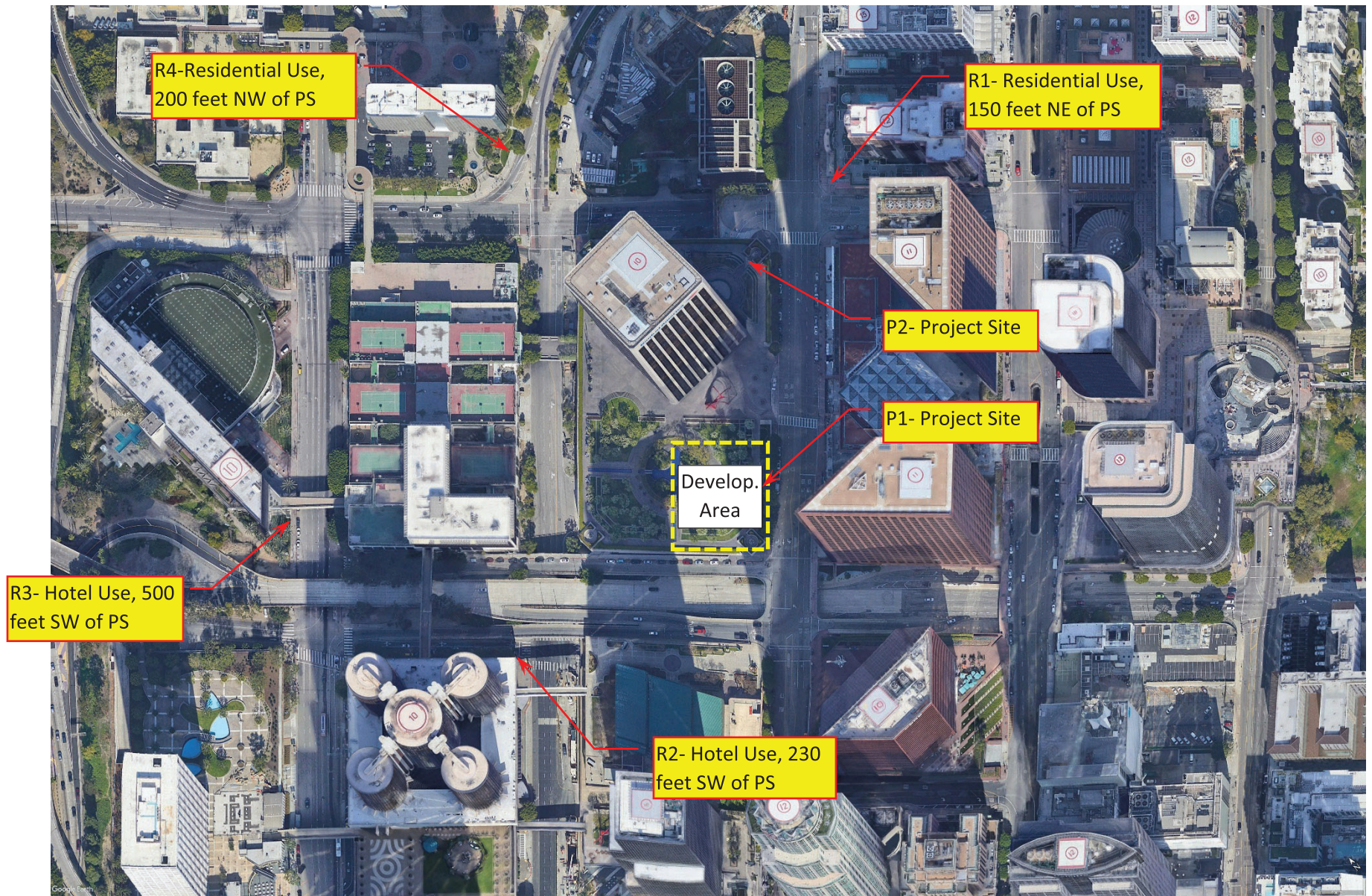


Figure 8
Noise Monitoring Locations

**Table 7
Existing Ambient Noise Levels**

Receptor Location	Approximate Distance to Project Site ^a (feet)	Measured Noise Levels, dBA L _{eq}		CNEL (dBA)
		Daytime Hours ^b (7 A.M.–10 P.M.)	Nighttime Hours ^b (10 P.M.–7 A.M.)	
R1—Multi-family Residential use at the northeast corner of Hope Street and 3rd Street, northeast of the Project Site	150	62.9	59.7	65.2 ^c
R2—Bonaventure Hotel located at the southwest corner of Flower Street and 4th Street, southwest of the Project Site	230	67.9	63.9	69.7 ^c
R3—Hotel uses at the northwest corner of Figueroa Street and 4th Street west of the Project Site. This receptor location also represents the Brio College Prep school located on the east side of Figueroa Street.	500	67.0	63.6	69.2 ^c
R4—Multi-family residential use at the northeast corner of Figueroa Street and 3rd Street, northwest of the Project Site	200	66.6	59.8	66.9 ^c
P1—Project Site southeast corner (development area)	On-Site	62.5	58.0	65.7
P2—Project Site northeast corner	On-Site	59.7	55.4	61.3 ^c
_____ CNEL = Community Noise Equivalent Level dBA = A-weighted sound pressure level in decibel L_{eq} = equivalent sound level ^a Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site. ^b The range of hours for the daytime and nighttime periods shown herein are defined by the LAMC. For receptor locations R1 and R2, daytime ambient noise levels were measured between 1:00 P.M. and 3:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 12:00 A.M. ^c Estimated based on short-term (15-minute) noise measurements per FTA procedures, see Appendix D of this document. Source: AES, 2022.				

which is a technical report containing actual measured noise data for construction equipment.³¹ These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.³² These noise levels are typically

³¹ Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006.

³² Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, page 7, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

Table 8
Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (percent)	Reference Maximum Noise Levels at 50 Feet ^a L _{max} (dBA)
Air Compressor	40	78
Cement and Mortar Mixer	50	80
Compactor	20	83
Concrete Mixer Truck	40	79
Concrete Saw	20	90
Crane	16	81
Drill Rig	20	84
Forklift	10	75
Generator	50	81
Dump/Haul Truck	40	76
Excavator	40	81
Pump	50	81
Roller	20	80
Rubber Tired Loader	40	79
Tractor/Loader/Backhoe	40	80
Delivery Truck	40	74
Welders	40	74
<i>dBA = A-weighted sound pressure level in decibel</i> <i>L_{max} = maximum sound level</i> ^a Construction equipment noise levels are based on FHWA RCNM. Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, 2006.		

associated with multiple pieces of equipment operating simultaneously. Therefore, the construction noise levels at the sensitive receptor locations were calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.³³ Additional noise attenuation was assigned as the line-of-sight to the Project Site would be interrupted by the presence of existing intervening structures.³⁴

Table 9 on page 66 provides the estimated on-site construction noise levels at the off-site noise sensitive receptors. As indicated in Table 9, the estimated construction noise levels would not exceed the significance criteria (5 dBA above ambient) at all off-site receptors. Therefore, the Project's potential noise impacts due to on-site construction would be less than significant and no mitigation is required.

³³ Caltrans, Technical noise Supplement (TeNS), September 2013, Chapter 2.1.4.1, <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

³⁴ Caltrans, Technical noise Supplement (TeNS), September 2013, Figure 2-15, <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

**Table 9
Construction Noise Levels**

Receptor Location	Calculated Construction Noise Levels by Month, ^a CNEL (dBA)								Existing Daytime Ambient Noise Levels (L _{eq} (dBA))	Significance Criteria (L _{eq} (dBA)) ^a	Maximum Noise Exceedance Above the Criteria (L _{eq} (dBA))	Significant Impact?
	Demo-lition	Site Prep.	Grading/Excava-tion	Trenching/Founda-tion	Building Exterior	Building Interior/ Arch. Coating	Paving	Land-scape				
R1	66.2	58.6	61.7	58.0	58.7	58.9	59.5	59.3	62.9	67.9	0.0	No
R2	60.6	53.3	56.2	52.6	53.2	53.3	54.1	53.9	67.9	72.9	0.0	No
R3	50.0	42.4	45.4	41.7	42.5	42.7	43.3	43.1	67.0	72.0	0.0	No
R4	50.3	42.7	45.7	42.1	42.9	43.0	43.6	43.4	66.6	71.6	0.0	No
Detail calculation worksheets are included in Appendix D of this document. ^a Significance criteria equal to the ambient noise level plus 5 dBA. Source: AES, 2022.												

Off-Site Construction (Traffic) Noise

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction.

Construction delivery/haul trucks would travel on approved truck routes between the Project Site and the Harbor Freeway (I-110). Project construction trucks (haul, concrete, and material delivery trucks) would access I-110 via the following optional routes:

- Option 1: Incoming trucks would travel from the I-110 Freeway northwest of the Project Site, exit toward 3rd Street, turn left heading south on Beaudry Avenue to 4th Street, turn left onto 4th Street heading east, turn left onto Hope Street heading north, and turn left onto 4th Street (westbound) to the Project Site. Departing trucks would continue on 4th Street heading west, turn right onto Figueroa Street heading north, turn left onto 3rd Street heading west, and turn right onto the I-110 Freeway heading northbound.
- Option 2: Incoming trucks would travel from the I-110 Freeway northwest of the Project Site, exit toward 3rd Street, turn left heading south on Beaudry Avenue to 4th Street, turn left onto 4th Street heading east, and turn left onto Flower Street to the Project Site. Departing trucks would exit the Project Site via Flower Street heading north, turn left onto 3rd Street heading west, and turn right onto the I-110 Freeway heading northbound.

There are no noise sensitive uses along the short segment of Hope Street between 4th Street eastbound and 4th Street westbound. In addition to the construction trucks, construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, which would not overlap with the Project construction equipment or trucks. Noise levels from construction trucks would be higher than those of construction workers vehicles. Therefore, the noise impacts are based on the construction trucks. Table 10 on page 68 provides the estimated number of construction-related truck trips and the estimated noise levels along the anticipated truck route. As indicated in Table 10, the estimated off-site construction noise levels would be below the significance criteria along the anticipated haul routes. Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant.

Operational Noise

Noise associated with Project operation would include: (a) on-site stationary source noise, including outdoor mechanical equipment (e.g., HVAC equipment), parking facilities, and activities within the proposed outdoor spaces; and (b) off-site mobile source (roadway traffic) noise.

Table 10
Off-Site Construction Truck Noise Levels

Construction Phase	Estimated Number of Construction Truck Trips per Day	Estimated Number of Construction Truck Trips per Hour ^a	Estimated Truck Noise Levels Plus Ambient Along the Project Truck Routes, ^a (L _{eq} (dBA)) (Project/Project + Ambient)				
			Beaudry Avenue	4th Street	3rd Street	Figueroa Street	Flower Street
P0a Demo on Grade	32	3	55.4/66.9	56.5/68.2	51.7/66.7	54.9/67.3	52.6/67.2
P0b Site Prep	4	1	50.6/66.7	51.7/68.0	46.9/66.6	50.1/67.1	47.8/67.1
P1a Demo Garage	28	3	55.4/66.9	56.5/68.2	51.7/66.7	54.9/67.3	52.6/67.2
P1b Grading	24	2	53.6/66.8	54.7/68.1	49.9/66.7	53.1/67.2	50.8/67.1
P1c Mat Foundation	112	7	59.1/67.3	60.2/68.6	55.4/66.9	58.5/67.6	56.2/67.3
P1d Structure Garage	40	3	55.4/66.9	56.5/68.2	51.7/66.7	54.9/67.3	52.6/67.2
P2a Structure Tower	92	6	58.4/67.2	59.5/68.5	54.7/66.9	57.9/67.5	55.6/67.3
P2b Construction Exterior	8	1	50.6/66.7	51.7/68.0	46.9/66.6	50.1/67.1	47.8/67.1
P2c Construction Interior	60	4	56.6/67.0	57.7/68.3	52.9/66.8	56.1/67.3	53.8/67.2
Landscape	10	1	50.6/66.7	51.7/68.0	46.9/66.6	50.1/67.1	47.8/67.1
TCO C of O	8	1	50.6/66.7	51.7/68.0	46.9/66.6	50.1/67.1	47.8/67.1
Existing Ambient Noise Levels along the Project Haul Routes, ^c L _{eq} (dBA)			66.6	67.9	66.6	67.0	67.0
Significance Criteria, ^d L _{eq} (dBA)			71.6	72.9	71.6	72.0	72.0
Maximum Noise Exceedance Above the Criteria, L _{eq} (dBA)			0.0	0.0	0.0	0.0	0.0
Significance Impact?			No	No	No	No	No
^a Haul truck hourly trips are based on 6-hour per day. Other delivery trucks are based on 8-hour per day. ^b Noise levels include Project-related truck trips plus ambient. ^c Ambient noise levels along the truck routes are based on measured ambient at nearby receptor locations, i.e., ambient along 4th Street (receptor R2), Figueroa Street and Flower Street (receptor R3), 3rd Street and Beaudry Avenue (receptor R4). ^d Significance criteria are equivalent to the measured ambient noise levels plus 5 dBA. Detail calculation worksheets are included in Appendix D of this document. Source: AES, 2022.							

On-Site Operational Noise

Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level of the new buildings. Project-related outdoor mechanical equipment would be designed to comply with the City's Noise Regulations (Section 112.02 of the LAMC) to ensure that it would not increase the existing ambient noise levels by 5 dBA. Table 11 on page 69 presents the estimated on-site mechanical equipment noise levels associated with this

Table 11
Mechanical Equipment Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Noise from Project Mechanical Equipment, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})	Significance Threshold, ^a dBA (L _{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	59.7	50.1	60.2	64.7	0.0	No
R2	63.9	48.1	64.0	68.9	0.0	No
R3	63.6	38.9	63.6	68.6	0.0	No
R4	59.8	44.0	59.9	64.8	0.0	No
^a Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptor plus 5 dBA, per City's Noise Regulations. Detailed calculation worksheets are included in Appendix D of this document. Source: AES, 2022.						

equipment at the off-site receptor locations. As shown on Table 11, the estimated noise levels from the mechanical equipment would range from 38.9 dBA (L_{eq}) at receptor location R3 to 50.1 dBA (L_{eq}) at receptor location R1, which would be well below the existing ambient noise levels. As such, the Project's noise levels due to the mechanical equipment at the off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. Therefore, noise impacts from the Project's mechanical equipment would be less than significant.

Outdoor Spaces

The Project would include outdoor spaces at the Plaza Level (patio, recreational lawn, and dog run), pool deck at Level 3, and roof deck at Level 34. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces. In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. Table 12 on page 70 presents the estimated number of people at the outdoor spaces and amplified sound system sound levels. In addition, the hours of operation for use of the outdoor areas were assumed to be from 8:00 A.M. to 12:00 A.M.

Table 13 on page 70 presents the estimated noise levels from the Project's outdoor areas at the off-site sensitive receptors, resulting from the use of outdoor areas. As presented in Table 13, the estimated noise levels from the outdoor spaces would range from 49.9 dBA (L_{eq}) at off-site receptor location R4 to 58.4 dBA (L_{eq}) at receptor location R2, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels. Therefore, the Project's potential noise impacts from the outdoor uses would be less than significant, and no mitigation is required.

Table 12
Outdoor Activity Area Analysis Assumptions

Outdoor Spaces	Estimated Total Number of People ^a	Amplified Sound System, dBA (L _{eq})
Level Plaza—Outdoor Patio	55	80 dBA at 15 feet
Level Plaza—Recreational Lawn	120	80 dBA at 15 feet
Level 3—Pool Deck	254	85 dBA at 25 feet
Level 34—Roof Deck	342	85 dBA at 25 feet
^a Based on maximum 15 square feet per person, per the Building Code. Source: Large Architecture, 2021; AES, 2022.		

Table 13
Estimated Noise Levels from Outdoor Spaces

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Noise from Outdoor Spaces, ^a dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})	Significance Threshold, ^a dBA (L _{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	59.7	53.0	60.5	64.7	0.0	No
R2	63.9	58.4	65.0	68.9	0.0	No
R3	63.6	58.2	64.7	68.6	0.0	No
R4	59.8	49.9	60.2	64.8	0.0	No
^a Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA. Detail calculation worksheets are included in Appendix D of this document. Source: AES, 2022.						

Parking

Parking for the Project would be provided within the existing enclosed parking structure. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. Since the parking structure would be fully enclosed on all sides, with the exception of the entrance/exit at the southwest corner facing Flower Street, noise generated within the enclosed parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Therefore, noise impacts from the parking garage would be less than significant. Therefore, the Project's potential noise impacts from parking operations would be less than significant, and no mitigation is required.

Off-Site Operational (Traffic) Noise

Off-site roadway noise was analyzed using the FHWA TNM model and traffic data from the Project's Transportation Assessment, which is included as Appendix D of this document.³⁵ The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor. Roadway noise conditions without the Project ("Future without Project") were calculated and compared to noise levels that would occur with implementation of the Project ("Future Plus Project") to determine Project-related noise impacts for operational off-site roadway noise. Table 14 on page 72 presents the off-site traffic noise impacts for the Future plus Project condition. As indicated in Table 14, the estimated increase in traffic-related noise levels along the analyzed roadway segments would be well below the 3-dBA and 5-dBA CNEL significance criteria.

In addition, traffic noise impacts were also analyzed to determine the potential noise impacts based on the increase in noise levels due to the Project ("Existing Plus Project") compared with the existing without Project conditions ("Existing Without Project"). Table 15 on page 73 presents the off-site traffic noise impacts when compared with the existing conditions. As indicated in Table 15, the estimated increase in traffic-related noise levels along the analyzed roadway segments would be well below the 3-dBA and 5-dBA CNEL significance criteria. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

Composite Noise Levels

An evaluation of the Project's composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the off-site noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment and outdoor uses. Table 16 on page 74 presents the estimated composite noise from Project-related noise sources in terms of CNEL at the off-site noise sensitive receptors. As reported in Table 16, the composite noise levels from Project operation at the off-site receptor locations would be below the 3 dBA significance criteria criterion (applicable to receptor R2) as the composite (Project plus Ambient) noise level falls within the normally unacceptable (70 to 75 CNEL) land use category and the 5 dBA significance criteria criterion (applicable to receptors R1, R3 and R4) as the composite noise levels fall within the conditionally acceptable (60 to 70 CNEL) land use category. Therefore, the composite noise level impacts due to Project operation would be less than significant.

Based on the above, the project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and no significant noise impacts would occur.

³⁵ Federal Highway Administration, Traffic Noise Model (TNM) Version 2.5,

Table 14
Off-Site Roadway Traffic Noise Impacts—Future Plus Project

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels, ^a CNEL (dBA)		Increase in Noise Levels due to Project, dBA (CNEL)	Significant Impact?
		Future Without Project	Future Plus Project		
Flower Street					
– Between 2nd St. and 3rd St.	Residential	69.1	69.1	0.0	No
– Between 3rd St. and 4th St.	Commercial	69.6	69.7	0.1	No
– Between 4th St. and 5th St.	Hotel	69.9	70.0	0.1	No
Hope Street					
– Between 2nd St. and 3rd St.	Residential	66.6	66.7	0.1	No
– Between 3rd St. and 4th St.	Commercial	66.4	66.4	0.0	No
– Between 4th St. and Hope Pl.	Commercial	64.5	64.5	0.0	No
3rd Street					
– Between Figueroa St. and Flower St.	Hotel	70.7	70.8	0.1	No
– Between Flower St. and Hope St.	Residential	68.5	68.6	0.1	No
– Between Hope St. and Grand Ave.	Residential	63.5	63.7	0.2	No
4th Street					
– Between Figueroa St. and Flower St.	Hotel	68.0	68.0	0.0	No
– Between Flower St. and Olive St.	Commercial	66.1	66.1	0.0	No
^a Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix D of this document. Source: AES, 2022.					

Table 15
Off-Site Roadway Traffic Noise Impacts—Existing Plus Project

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels, ^a CNEL (dBA)		Increase in Noise Levels due to Project, dBA (CNEL)	Significant Impact?
		Existing Conditions	Existing Plus Project		
Flower Street					
– Between 2nd St. and 3rd St.	Residential	68.8	68.8	0.0	No
– Between 3rd St. and 4th St.	Commercial	69.3	69.4	0.1	No
– Between 4th St. and 5th St.	Hotel	69.6	69.6	0.0	No
Hope Street					
– Between 2nd St. and 3rd St.	Residential	66.3	66.3	0.0	No
– Between 3rd St. and 4th St.	Commercial	66.0	66.0	0.0	No
– Between 4th St. and Hope Pl.	Commercial	64.3	64.3	0.0	No
3rd Street					
– Between Figueroa St. and Flower St.	Hotel	69.5	69.6	0.1	No
– Between Flower St. and Hope St.	Residential	67.6	67.7	0.1	No
– Between Hope St. and Grand Ave.	Residential	62.9	63.1	0.2	No
4th Street					
– Between Figueroa St. and Flower St.	Hotel	67.7	67.7	0.0	No
– Between Flower St. and Olive St.	Commercial	65.4	65.4	0.0	No
^a Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix D of this document. Source: AES, 2022.					

**Table 16
Composite Noise Levels**

Receptor Location	Existing Ambient Noise Levels (CNEL (dBA))	Calculated Project-Related Noise Levels, ^a CNEL (dBA)			Project Composite Noise Levels (CNEL (dBA))	Ambient Plus Project Composite Noise Levels (CNEL (dBA))	Increase in Noise Levels due to Project (CNEL (dBA))	Significance Criteria ^a (CNEL (dBA))	Significant Impact?
		Traffic	Mechanical	Outdoor Spaces					
R1	65.2	39.8	56.8	56.3	59.6	66.3	1.1	70.2	No
R2	69.7	41.8	54.8	61.7	62.6	70.5	0.8	72.7	No
R3	69.2	39.6	45.6	61.5	61.7	69.9	0.7	74.2	No
R4	66.9	43.3	50.7	53.1	55.4	67.2	0.3	71.9	No

^a Detail calculation worksheets are included in Appendix D of this document.

Source: AES, 2022.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

On-Site Construction Vibration Impacts

Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., within 20 feet related to building damage; 80 feet related to human annoyance at residential uses).³⁶

Heavy construction equipment (e.g., a large bulldozer) would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.³⁷ With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings.³⁸ Table 17 on page 76 provides the estimated vibration levels at the nearest off-site buildings. As indicated in Table 17, the estimated vibration velocity levels from construction equipment would be below the significance criteria at the nearest off-site buildings.

With respect to potential vibration-related human annoyance associated with on-site construction activities, FTA provides ground-borne vibration impact criteria of 72 VdB for residential uses.³⁹ Vibration impacts associated with potential human annoyance were analyzed at four sensitive receptor locations. Table 18 on page 76 provides the estimated vibration levels at the nearest off-site sensitive receptor locations. As indicated in Table 18, the estimated vibration levels from all construction equipment would be below the significance criteria at all off-site sensitive receptors. As such, the Project's potential vibration impacts with respect to human annoyance associated with on-site construction activities would be less than significant, and no mitigation is required.

Off-Site Construction Vibration Impacts

Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route. Based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. There are existing buildings along the Project's anticipated haul route, including Beaudry Avenue, 4th Street, 3rd Street, Figueroa Street, and Flower Street, that are situated approximately 25 feet from the truck travel lane and would be exposed to ground-borne vibration levels of approximately 0.016 PPV. This

³⁶ Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 72 VdB significance threshold with respect to human annoyance and 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage.

³⁷ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4.

³⁸ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5.

³⁹ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-3, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

Table 17
Construction Vibration Impacts—Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Off-Site Buildings, PPV, ^a				Significance Threshold, PPV	Significant Impacts?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.076	0.035	0.003	—	—
Commercial buildings north of the Project Site	0.001	0.001	0.001	<0.001	0.5 ^b	No
Apartment buildings south of the Project Site	0.003	0.001	0.001	<0.001	0.5 ^b	No
Apartment buildings east of the Project Site	0.007	0.006	0.003	<0.001	0.5 ^b	No
Commercial buildings west of the Project Site	0.002	0.002	0.001	<0.001	0.5 ^b	No
^a Vibration level calculated based on FTA reference vibration level at 25 foot distance. ^b Significance threshold is based on FTA criteria for reinforced-concrete, steel or timber buildings. Source: FTA, 2018; AES, 2022						

Table 18
Construction Vibration Impacts—Human Annoyance

Receptor Location	Estimated Vibration Velocity Levels at the Off-Site Sensitive Receptors, VdB, ^a				Significance Threshold, PPV	Significant Impacts?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	86	79	58	—	—
R1	46	45	38	17	72	No
R2	53	52	45	24	72	No
R3	44	43	36	15	72	No
R4	45	44	37	16	75	No
^a Vibration level calculated based on FTA reference vibration level at 25-foot distance. ^b Significance threshold is based on FTA criteria for reinforced-concrete, steel or timber buildings. Source: FTA, 2018; AES, 2022						

estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts (pursuant to the thresholds of significance for building damage) from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

Per FTA guidance, the thresholds of significance for human annoyance is 72 VdB for residential and hotel uses, and 75 VdB for institutional (school) uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. There are no vibration sensitive uses along Beaudry Street (between the I-110 Freeway and 4th Street) and Flower Street (between 3rd Street and 4th Street). There are residential, hotel, and school uses along Figueroa Street, 3rd Street, and 4th Street, which are located approximately 30 feet from the truck travel lane. The estimated vibration levels generated by construction trucks at 30 feet would be approximately 69.7 VdB, which would be below the 72-VdB (for residential and hotel uses) and the 75-VdB (for school uses) threshold of significance. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul route would be less than significant.

Operational Groundborne Vibration

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking garage. Groundborne vibration from passenger vehicle would be similar to the existing parking garage. Furthermore, the off-site sensitive uses are located minimum 150 feet from the Project Site. Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operation at the off-site sensitive receptors would be well below the perceptible level. Therefore, the Project would not result in the generation of excessive groundborne vibration levels at sensitive receptors in the vicinity of the Project site. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

Based on the above, groundborne vibration and groundborne noise impacts associated with the Project would be less than significant.

Conclusion—Noise

Overall, based on the above, approval of the Project would not result in any significant effects relating to noise.

3.2.4.3 Air Quality

The Project's potential impacts on air quality were analyzed by estimating the air pollutant emissions generated by construction and operation of the Project and determining whether Project emissions would: (a) conflict with or obstruct implementation of the applicable air quality plan; (b) result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard; (c) expose sensitive receptors to substantial pollutant concentrations; or (d) result in other emissions, such as those leading to odors, affecting a substantial number of people. This analysis is supported by the air quality worksheets included in Appendix E of this document.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, PM₁₀, and PM_{2.5}). As such, the Project would be subject to the SCAQMD's 2016 Air Quality Management Plan (AQMP). The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.⁴⁰ With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. The 2020–2045 RTP/SCS growth projections are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP.

Because the Project is consistent with the land use designations in the General Plan of the City of Los Angeles, and more specifically, the Central City Community Plan, the Project is also considered consistent with the region's AQMP. In addition, as discussed below, Project implementation would not exceed any ambient air quality standards or thresholds. Therefore, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP.

b. 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?

As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD Handbook.⁴¹

⁴⁰ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

⁴¹ South Coast Air Quality Management District. Air Quality Analysis Guidance Handbook, www.aqmd.gov/ceqa/hdbk.html.

Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition, site preparation, and construction activities. Mobile source emissions, primarily particulate matter (PM) and nitrogen oxides (NO_x) would result from the use of construction equipment such as loaders, cranes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As discussed above, the Project consist of a 34-story residential tower that would include up to 366 residential units. The Project would include a total of 309,160 square feet of new floor area, including 7,726 square feet of residential amenity uses, 2,054 square feet for leasing, a 2,305-square-foot lobby, 3,518 square feet of addition residential lobby/vestibule and back of house uses; and a 425-square-foot café with an outdoor seating area at the Plaza Level. The proposed building would reach a maximum height of 420 feet, 7 inches as measured to the highest building element, per LAMC Section 12.03. Parking for the proposed uses would be provided in the existing subterranean parking structure that underlies the Project Site. In accordance with the LAMC and the Specific Plan, the Project would provide 187 dedicated vehicular parking spaces on designated levels within the parking structure. In addition, the Project would provide 189 bicycle parking spaces, including 169 long-term spaces and 20 short-term spaces. Construction would require approximately 58,000 square feet of demolition and approximately 10,500 cubic yards of export. Construction of the new residential tower would occur over 40 months. Construction would result 309,160 square feet of new residential land use resulting in a total of 1,618,502 square feet of floor area within the Project Site.

For the purpose of identifying potential construction-related air quality impacts, this analysis assumed that construction would occur in the minimum timeframe (no sub-phasing) and the earliest construction year. This approach is conservative in that it evaluates impacts from construction with the maximum daily earth movement, soil disturbance, and use of heavy-duty construction equipment that could occur on a maximum construction day. If construction is delayed or occurs over a longer time period, emissions could be reduced because of: (1) a more modern and cleaner burning construction equipment fleet mix; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2020.4.0. Model results are provided in Appendix E of this document. The analysis assumed that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional and localized emissions for construction is presented in Table 19 on page 80, along with the regional significance thresholds for each air pollutant.

Table 19
Regional and Localized Unmitigated Construction Emissions^a
(pounds per day)

	VOC	NO _x	CO	SO _x	PM ₁₀ ^b	PM _{2.5} ^b
Regional Emissions						
2023	3	34	30	0	6	3
2024	4	45	39	0	7	4
2025	12	40	59	0	8	3
2026	8	16	32	0	5	2
Maximum Regional Emissions	12	45	59	<1	8	4
Threshold	75	100	550	150	150	55
Difference	(63)	(55)	(491)	(150)	(142)	(51)
Impact (Exceed Threshold?)	No	No	No	No	No	No
Localized Emissions						
2023	3	28	27	<1	4	3
2024	3	30	34	<1	4	3
2025	10	35	41	<1	1	1
2026	7	14	23	<1	<1	<1
Maximum Localized Emissions	10	35	41	<1	4	3
Threshold^c		76	1,643		14	7
Difference		(41)	(1,602)		(10)	(5)
Impact (Exceed Threshold?)		No	No		No	No
^a Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix E of this document. ^b PM ₁₀ and PM _{2.5} emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression. ^c The SCAQMD Localized Significance Thresholds (LSTs) are based on Source Receptor Area No. 1 (Central LA County) for a 4.21-acre site with a 25-meter receptor distance. Source: Eyestone Environmental, 2022.						

As shown in Table 19, maximum unmitigated regional construction emissions would not exceed the thresholds for VOC, NO_x, carbon monoxide (CO), sulfur dioxide (SO_x), PM₁₀, or PM_{2.5}.

Localized Impacts

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate.⁴² SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of

⁴² SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. If a project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling be performed.

A conservative estimate of construction maximum local (on-site) daily emissions for NO_x, PM₁₀, PM_{2.5}, and CO are presented in Table 19 on page 80. Localized construction emissions thresholds, based on the construction site acreage and distance to the closest off-site sensitive receptor, were obtained from the LST look-up tables and are also listed in Table 19. The nearest sensitive receptors during construction are educational uses northwest of Flower Street (Brio College Prep located approximately 150 meters from the Project Site). However, this analysis conservatively assumes a 25-meter receptor distance for construction. As presented in Table 19, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, localized construction emissions resulting from the project would result in a less than significant short-term impact.

Operational

The SCAQMD has also established separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term Project operations. The increase in square footage of occupied buildings could also result in an increase of emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings). Operational emissions related to the increase in vehicular trips and building square footage were computed using the CalEEMod emissions model.

Regional Impacts

As discussed above, the Project would result in an increase in residents and associated vehicular trips as well as an increase in building space. As such, the Project would result in an increase in emissions from vehicular exhaust and the consumption of fossil fuels for comfort heating. The results of the detailed emissions calculations are provided in **Table 20** on page 82, and CalEEMod model output files are presented in Appendix E of this document. As indicated therein, the Project would result in a slight increase of criteria pollutant emissions and emissions would be well below the SCAQMD daily significance thresholds for long-term regional operations. Therefore, no impacts associated with regional operational emissions would occur.

Table 20
Project-Related Operational Emissions^a
(pounds per day)

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project Emissions^a						
Area	8	6	33	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	3	3	26	<1	6	2
Emergency Generator	<1	1	<1	<1	<1	<1
Total Regional Emissions	12	11	60	<1	7	2
Threshold	55	55	550	150	150	55
Difference	(43)	(44)	(490)	(150)	(143)	(53)
Impact (Exceed Threshold?)	No	No	No	No	No	No
^a Worksheets and modeling output files are provided in Appendix E. Source: Eystone Environmental, 2022.						

Localized Impacts

Potential localized CO concentrations from induced traffic at nearby intersections are addressed consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP.⁴³ The analysis prepared for CO attainment in the Air Basin by SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).⁴⁴ In the 1992 CO Plan, a CO hot spot analysis was conducted for the four worst-case scenario intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The peak modeled CO concentrations due to vehicle emissions occurred at the intersection of Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 parts per million (ppm), which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.⁴⁵ As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. As discussed in Checklist Section XVII, Transportation, the Project would result in a net increase of 1,208 vehicle trips. It is unlikely that trips generated by the Project would result in a nearby intersection to exceed 400,000 vehicle trips per day. Therefore, the Project

⁴³ The latest CO hotspots modeling and attainment demonstration was performed as part of the 2003 AQMP. Results of the attainment demonstration were eventually incorporated into the redesignation request and approved by the USEPA.

⁴⁴ SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.

⁴⁵ Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD *CEQA Air Quality Handbook*, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. The nearest sensitive receptors include residential uses north of Mulholland Place and educational uses south and west of Mulholland Drive. It is noted that the Project Site is also considered a sensitive land use.

As described above, construction and operation of the Project would result in a less than significant impact for both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the “*Air Quality and Land Use Handbook: A Community Health Perspective (2005)*,” which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The SCAQMD adopted similar recommendations in their “*Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005)*.” Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources, and the addition of new TAC sources in proximity to existing sensitive land uses.

The Project would not include any new substantial TAC sources as defined in the guidance document. Therefore, the analysis focused on on-site sensitive land uses. Residents may be impacted by existing off-site sources of TACs. Based on CARB siting recommendations, sensitive receptors should not be sited within 500 feet of a freeway or similar high traffic roadway (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day), within 50 feet of a typical gasoline station (less than 3.6 million gallons of throughput), or within 300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations.

Potential sources of TACs were identified using the Facility Information Database (FIND) search, which is a resource for discovering SCAQMD permitted sources in the vicinity of the Project Site. In addition, site reconnaissance was conducted to identify potential non-permitted air toxic emitting sources (e.g., freeways). Six TAC sources were located within 0.25 mile from the Project Site.

Off-site TAC sources identified include the I-110 Freeway and five diesel emergency generators.⁴⁶ The diesel emergency generators are operated in compliance with SCAQMD Rule 1110.2 and would typically be used one hour a month for routine testing unless a power outage. Thus, the diesel emergency generators would not be considered a substantial source requiring additional analysis.

Regarding the proximity to the I-110 Freeway, the Project is located beyond 500 feet of the I-110 Freeway and consistent with SCAQMD's and CARB's recommended siting distance for freeways. In addition, the Project would include heating, ventilation and air conditioning (HVAC) control systems that have a minimum efficiency reporting value (MERV) of 13 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. Furthermore, to minimize exposure to diesel exhaust and the re-entrainment of paved roadway dust. A building with HVAC equipped with MERV 13 would reduce exposure to particles with an average size from 1.0 to 3.0 microns (range of diesel particulate) between 80 to 89.9 percent.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No other emissions, including objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to operation of the Project, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The Project would include the development of residential uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations⁴⁷ as well as SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.⁴⁸

⁴⁶ SCAQMD Facility ID 144905, Nextel of California, Inc., 16000 Mulholland Drive, Los Angeles, CA 90049.

⁴⁷ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 11, 2022.

⁴⁸ SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed April 11, 2022.

Based on the above, the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people during either construction or operation of the Project, and impacts would be less than significant.

Conclusion—Air Quality

Overall, based on the above, approval of the Project would not result in any significant effects relating to air quality.

3.2.4.4 Water Quality

The Project's potential impacts related to water quality were analyzed in the Hydrology and Water Quality Technical Report, which was prepared for the Project by KPFF Consulting Engineers, and is included as Appendix F of this document. Pursuant to the Hydrology and Water Quality threshold (a) included in Appendix G of the State CEQA Guidelines, a project would have a significant water quality impact if the Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Surface Water Quality

Construction activities, such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering, can contribute to pollutant loading in storm water runoff. As there is an existing dewatering system for the Project Site, the Project is expected to require dewatering during construction. Discharges from dewatering can contain high levels of fine sediments, which if not properly treated, which, if not treated properly, could lead to exceedance of the National Pollutant Discharge Elimination System (NPDES) requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, with implementation of the Erosion Control Plan, site-specific BMPs would reduce or eliminate the discharge of potential pollutants from storm water runoff. In addition, the Project would be required to comply with City grading permit regulations and inspections to reduce sedimentation and erosion, and the Project would also comply with applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste. Thus, no significant impacts to surface water quality would occur during construction of the Project.

During operation of the Project, there would be no increase in site peak flows or volume as compared to existing conditions. The Project would incorporate BMPs in compliance with Low Impact Development (LID) requirements to control and treat stormwater runoff. The BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater that bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. Thus, operation of the Project would not result in discharges that would cause regulatory standards to be violated.

Groundwater Quality

The Project would result in a net export of approximately 10,500 cubic yards of existing soil material. Although not anticipated, any contaminated soils found would be captured within that volume of

excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements. Furthermore, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for construction and operation of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well.

Conclusion—Water Quality

Overall, based on the above, approval of the Project would not result in any significant effects relating to water quality.

3.2.5 Consistency with Section 15332(e): The site can be adequately served by all required utilities and public services.

The Project Site would be adequately served by public services and utilities. The Project would comply with all applicable regulatory requirements, and new or expanded public service facilities (including fire, police, schools, parks, and libraries), would be funded via existing mechanisms (e.g., property and sales taxes, government funding, developer fees, etc.) to which the Project would contribute. With regard to utilities, as demonstrated in the Utility Infrastructure Technical Report (Utility Report) prepared by KPFF Consulting Engineers and included as Appendix G of this document, including in the will-serve letters included as appendices to that report, the Project could be adequately served by required utilities. Thus, as demonstrated below, the Project is consistent with the conditions outlined in CEQA Section 15332(e).

Public Services

Fire Protection

The Los Angeles Fire Department (LAFD) provides fire protection and emergency services for the Project Site. The Project is located within LAFD's Central Bureau, which encompasses Downtown Los Angeles and the surrounding communities. There are five fire station located within a 2-mile radius of the Project Site. The nearest and first-in station to the Project Site is Fire Station No. 3, located approximately 0.2 mile north of the Project Site at 108 North Fremont Avenue.⁴⁹ Secondary fire stations that serve the Project Site include Fire Station No. 9, located approximately 0.86 mile southeast of the Project Site at 430 East 7th Street; Fire Station 4, located approximately 1.3 miles east of the Project Site at 450 East Temple Street; Fire Station No. 10, located approximately 1.4 miles southwest of the Project Site at 1335 South Olive Street; and Fire Station No. 11, located approximately 1.5 miles west of the Project Site at 1819 West 7th Street.

The factors that LAFD considers in determining if fire protection services are adequate for a project are if the project: (1) is within the maximum response distance for the proposed land use(s); (2) complies with emergency access requirements; (3) complies with fire flow requirements; and (4) complies with fire hydrant placement requirements.

⁴⁹ LAFD, Find Your Station, www.lafd.org/fire-stations/find-your-station, accessed May 17, 2022.

Pursuant to LAMC Section 57.507.3.3, the maximum response distance between a high-density residential and commercial neighborhood land use and a LAFD station that houses an engine company is 1.5 miles, and LAFD station that houses a truck company is 2.0 miles. As outlined above, there are five fire station within 1.5 miles of the Project Site that accommodate a range of engine and truck companies, paramedics, etc. Based on the LAMC criteria regarding response distance, the Project is located within the required 1.5 miles from a fire station with an engine company and within 2.0 miles from a fire station with a truck company.

Regarding emergency access requirements, vehicular access to the Project Site would be provided via the existing driveways along Flower Street and Hope Street. Service vehicles and delivery trucks would access the Project Site via the existing driveway along 4th Street. This access point would be widened to accommodate one additional lane for egress. Internal modification would be made to the existing parking structure to accommodate circulation, as necessary. All access points would adhere to all applicable Los Angeles Department of Building and Safety (LADBS) and LAFD standards and requirements.

With regard to fire flow, LAMC Section 57.507.3 establishes fire flow standards by development type. Based on these standards, the existing Project Site (including the existing office tower and subterranean parking structure) falls within the Industrial and Commercial Land Use category, which has a required fire flow of 6,000 gallons per minute (gpm) from four to six fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi), which requires a minimum of 1,500 gpm per fire hydrant. The proposed Project (consisting of the multi-family residential building) falls within the High Density Residential and Commercial Neighborhood category, which has a required fire flow of 4,000 gpm from four hydrants flowing simultaneously with a residual pressure of 20 psi, which requires a minimum of 1,000 gpm per fire hydrant. As discussed in the Utility Infrastructure Report included as Appendix G of this document, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated needs. Based on the completed IFFAR (included as Exhibit 1 of Appendix G of this document), the six existing fire hydrants near the Project Site can provide a combined 9,000 gpm with the six fire hydrants flowing simultaneously. Therefore, based on the IFFAR, there is adequate fire flow and pressure available for the Project to comply with the fire flow requirements pursuant to LAMC Section 57.507.3.

As described in the Utility Infrastructure Report, there are currently six existing fire hydrants located near the Project Site. The number and location of any additional fire hydrants that may be required would be determined as part of LAFD's fire/life safety plan review for the Project. Furthermore, the Project would incorporate a fire sprinkler suppression system in the proposed building, which would be subject to LAFD review and approval during the design and permitting of the Project. This system would serve to reduce the Project's public hydrant demand. Per LAMC Section 94.2020.0, which adopts National Fire Protection Association (NFPA) standards, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. The Service Advisory Request (SAR) response from LADWP (refer to Exhibit 2 of the Utility Infrastructure Report) shows that the 12-inch water main along Hope Street has a static pressure of 95 psi and that a flow of 2,500 gpm can be delivered to the Project Site with a residual pressure of 87 psi. This confirms there is sufficient pressure to serve the Project. Thus, as shown by the IFFAR and SAR, there is adequate water pressure available to operate the proposed fire sprinkler suppression system and otherwise meet the Project's fire flow requirements.

Police Protection

Police protection services are provided to the Project Site and the surrounding area by the Los Angeles Police Department (LAPD). The Project Site is located within the jurisdiction of the LAPD's Central Bureau and is served by the Central Community Police Station located at 251 East 6th Street.⁵⁰ This station has a service area encompassing 4.5 square miles with a population of 40,000 people. The Central Community Police Station is staffed by approximately 400 sworn and civilian members of LAPD.⁵¹

The Project would introduce new residential uses to the Project Site, which could result in the need for additional police services. Based on 366 new dwelling units, LADOT's VMT Calculator estimates that the Project would add approximately 825 residents. This would increase the existing LAPD service population in the Central City Community Police Station from approximately 40,000 persons to approximately 40,825 persons, which is an approximately 2.1 percent increase.

The Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, the Project would include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas. In addition, the Project would include proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also design entrances to, and exits from, the building and open spaces areas, to be open and in view of surrounding sites. Furthermore, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. These design features would help offset the Project-related increase in demand for police services. In addition, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Thus, the Project would be adequately served by the LAPD.

Schools

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD) and would be served by Castelar Street Elementary School, located approximately 0.5 mile northeast of the Project Site; John H. Liechty Middle School, located approximately 0.4 mile west of the Project Site; and Belmont High School, located approximately 0.4 mile northwest of the Project Site, or any of the high schools located within the Belmont Zone of Choice area.⁵²

The Project would directly generate students through the construction of 366 residential uses. Using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate

⁵⁰ City of Los Angeles, Department of City Planning, Parcel Profile Report, <http://zimas.lacity.org/>, accessed May 17, 2022.

⁵¹ Los Angeles Police Department, About Central Area, https://lapdonline.org/central_community_police_station/content_basic_view/1681, accessed May 17, 2022.

⁵² Los Angeles Unified School District, Resident School Identifier, <https://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed May 17, 2022.

approximately 206 new students consisting of 112 elementary school students, 30 middle school students, and 64 high school students.⁵³

Pursuant to Senate Bill (SB) 50, the Applicant would be required to pay state-mandated school impact fees to LAUSD prior to issuance of a building permit. Pursuant to Section 65995(3)(h) of the California Government Code (SB 50, chaptered August 27, 1998), the payment of statutory fees "... is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Thus, the Project would be adequately serviced by the LAUSD.

Parks

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks (RAP). Nearby parks and recreational facilities within an approximately two-mile radius of the Project Site include: Pershing Square Park (located approximately 0.27 mile from the Project Site); Spring Street Park (located approximately 0.42 mile from the Project Site); City Hall Park Center (located approximately 0.53 mile from the Project Site); Vista Hermosa Park (located approximately 0.67 mile from the Project Site); San Julian Park (located approximately 0.75 mile from the Project Site); Los Angeles Plaza Park (located approximately 0.86 mile from the Project Site); Echo Park Indoor Pool (located approximately 0.86 mile from the Project Site); Patton Street Park (located approximately 0.94 mile from the Project Site); Unidad Park (located approximately 1 mile from the Project Site); Alpine Recreation Center (located approximately 1.02 miles from the Project Site); Gladys Park (located approximately 1.08 from the Project Site); Everett Triangle Park (located approximately 1.19 from the Project Site); Echo Park Recreation Center (located approximately 1.22 miles from the Project Site); Arts District Park (located approximately 1.30 miles from the Project Site); Hope and Peace Park (located approximately 1.35 miles from the Project Site); Lilac Terrace Park (located approximately 1.43 miles from the Project Site); Echo Park (located approximately 1.45 miles from the Project Site); MacArthur Park (located approximately 1.45 miles from the Project Site); Lake Street Park, Skate Park, and Community Center (located approximately 1.47 miles from the Project Site); Lake Street Community Center (located approximately 1.49 miles from the Project Site); Alvarado Terrace Park (located approximately 1.74 miles from the Project Site); Toberman Recreation Center (located approximately 1.76 miles from the Project Site); Montecillo De Leo Politi Park (located approximately 1.77 miles from the Project Site); Pecan Pool and Recreation Center (located approximately 1.81 miles from the Project Site); Lafayette Multipurpose Community Center and Skate Park (located approximately 1.83 miles from the Project Site); Buena Vista Meadow Picnic Area (located approximately 1.92 miles

⁵³ Based on student generation factors provided in the 2020 LAUSD Developer Fee Justification Study, March 2020. For residential uses, the following student generation rates were used: 0.2269 student per household (Grades K-6), 0.0611 student per household (Grades 7-8), and 0.1296 student per household (Grades 9-12). For Commercial uses, the student generation rate of 0.000638 student per sf for Neighborhood Shopping Centers, and for the existing Hotel use to be removed, the student generation rate of 0.000266 students per sf for Lodging was used. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

from the Project Site); Occidental Parkway (located approximately 1.95 miles from the Project Site); and Pico Union Vest Pocket Park (located approximately 1.98 miles from the Project Site).⁵⁴

As previously discussed, the Project would introduce new residential uses to the Project Site. Based on the generation factors from LADOT's VMT Calculator, the Project is anticipated to generate approximately 827 persons, including 825 residents and 2 employees.⁵⁵ An increase in the use of existing parks and recreational facilities is directly associated with an increase in the population.

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site. Specifically, the Project would provide approximately 27,809 square feet of exterior open space, which would include approximately 22,693 square feet of publicly accessible open space located on the Plaza Level and approximately 5,116 square feet of open space located on the rooftop amenity deck. At the Plaza Level, landscaping and gathering areas would be incorporated around the perimeter of the residential tower, including an outdoor seating area adjacent to the proposed café, a recreational lawn area, terraced seating, and an entry plaza. The rooftop open-air amenity deck would include lounging and dining areas, outdoor kitchens, a small pool/spa, and landscaping. The Project would also include residential amenity space on Level 3 of the building, which would provide a fitness room, pool, and spa that would overlook the plaza, and interior meeting rooms and lounge areas. In addition, as part of the Project an existing 5,097-square-foot pedestrian plaza area would be redeveloped.

Due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. While the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Furthermore, the Project would comply with LAMC Section 12.33, which requires the payment of a Quimby in-lieu fee (park fees), which would be used to increase recreational opportunities and improve existing parks. Thus, the Project would be adequately serviced by area park and recreational facilities.

Other Public Facilities (Libraries)

The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, regional branch libraries, and neighborhood branch libraries, as well as through Web-based resources. Library demand is typically generated by residential land uses.

⁵⁴ City of Los Angeles Department of Recreation and Parks, Facility Map Locator, [www.laparks.org/maplocator?cat_id=All&geo\[radius\]=2&geo\[latitude\]=34.1456553&geo\[longitude\]=-118.4119646&address=12825%20Ventura%20Blvd,%20Studio%20City,%20CA%2091604,%20USA](http://www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.1456553&geo[longitude]=-118.4119646&address=12825%20Ventura%20Blvd,%20Studio%20City,%20CA%2091604,%20USA), accessed May 20, 2022.

⁵⁵ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 366 units and employee generation rate of 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 425 square-foot ground floor café. As documented in Appendix D, VMT Worksheets, of the Project's Transportation Assessment (Appendix B of this document), the Project would generate approximately 825 residents and 2 employees. Therefore, the Project would result in a total of 827 persons on-site.

As previously discussed, the Project would introduce new residential uses to the Project Site. Based on the generation factors from LADOT's VMT Calculator, the Project is anticipated to generate approximately 827 persons, including 825 residents and 2 employees, which could result in a direct demand for libraries.⁵⁶ It is anticipated that a portion of the residential population generated by the Project that would visit library facilities would likely be dispersed among the various branch libraries serving the Project Site and it is not likely that all residents would visit the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.^{57,58} Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate.⁵⁹ The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Thus, the Project would be adequately served by the City's libraries.

Utilities

Water

Construction

As discussed in the Utility Report included as Appendix G of this document, Project construction activities would require water for a variety of activities, including but not limited to dust control, cleaning of equipment, excavation/export, removal and re-compaction. Based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 1,000 to 2,000 gallons per day (gpd). The estimated construction-period water demand will be less than the estimated operational demand of the Project, which, as discussed below, can be accommodated by existing infrastructure. Thus, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project.

Operation

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long

⁵⁶ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 366 units and employee generation rate of 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 425 square-foot ground floor café. As documented in Appendix D, VMT Worksheets, of the Project's Transportation Assessment (Appendix B of this document), the Project would generate approximately 825 residents and 2 employees. Therefore, the Project would result in a total of 827 persons on-site.

⁵⁷ Denise A. Troll, *How and Why Libraries are Changing: What We Know and What We Need to Know*, Carnegie Mellon University, 2002.

⁵⁸ Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

⁵⁹ City Administrative Officer, City of Los Angeles 2016–2017 Budget Overview, July 2016.

term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. These analyses are described in detail in the Utility Report included as Appendix G of this document.

With regard to fire flow, as discussed above, based on the completed IFFAR (included as Exhibit 1 of Appendix G of this document), the six existing fire hydrants near the Project Site can provide a combined 9,000 gpm with the six fire hydrants flowing simultaneously. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the requirements. Furthermore, the Project would incorporate a fire sprinkler suppression system in the proposed building, which would be subject to LAFD review and approval during the design and permitting of the Project. This system would serve to reduce the Project's public hydrant demand. As discussed above, based on the SAR response from LADWP (refer to Exhibit 2 of the Utility Infrastructure Report), the 12-inch water main along Hope Street has a static pressure of 95 psi and that a flow of 2,500 gpm can be delivered to the Project Site with a residual pressure of 87 psi. This confirms there is sufficient pressure to serve the Project. Thus, as shown by the IFFAR and SAR, there is adequate water pressure available to operate the proposed fire sprinkler suppression system and otherwise meet the Project's fire flow requirements.

Domestic water demand has been estimated based on City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN) sewage generation factors, and LADWP methodologies for calculating water demand for applicable land use categories. As shown in Table 21 on page 93, the Project would generate a net increase in water demand of 39,677 gpd. As determined in the Utility Report included as Appendix G of this document, there is sufficient water supply to satisfy water demand of the Project and the existing public water distribution infrastructure has sufficient capacity to serve the Project.

Wastewater

Construction

Construction activities would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to the City's wastewater system. The Project would require construction of new on-site infrastructure to serve the proposed uses; however, construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connection to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. No upgrades to the public main are anticipated.

Operation

Wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),⁶⁰ and current average wastewater flows are at approximately

⁶⁰ Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.4, Water Reclamation Plant Summary Wastewater Facilities Plan One Water LA 2040 Plan.

Table 21
Estimated Proposed Water Consumption

Land Use	Water Consumption (gpd/1,000 gr sf)	Quantity	Total Consumption (gpd)^a
Existing Development Area			
Underground Parking Structure	20 kgsf	242,740	4,855
Irrigation		598	598
Concourse Level—Office Spaces	120 kgsf	22,052	2,646
Existing Water Consumption			8,099
Proposed Development Area			
Cooling Tower ^b	4,701	1	4,701
Residential: Apt—Bachelor ^c	75 du	76	5,700
Residential: Apt—1 BDR ^d	110 du	222	24,420
Residential: Apt—2 BDR ^e	150 du	68	10,200
Office Space ^f	120 kgsf	1,338	161
Lobby Space ^g	50 kgsf	2,305	115
Pool ^h	1 sf ⁿ	1,245	106
Spa ⁱ	1 sf ⁿ	288	25
Café/Bar ^j	720 kgsf	288	306
Fitness Room ^k	650 kgsf	2,070	1,346
Lounge Space ^l	50 kgsf	704	35
Landscaping Irrigation Demand^m			648
Proposed Total Water Consumption			47,776
Net Increase in Water Consumption			39,677

du = dwelling units

gpd = gallons per day

gsf = gross square feet

kgsf = 1,000 gross square feet

sf = square feet

The average daily flow based on 100 percent of City of Los Angeles sewerage generation factors.

^a LASAN Sewage Generation Factor Exhibit 6.

^b Cooling Tower Demand provided by Glumac: 1,715,900 gal per year.

^c Studio unit considered as “Residential: Apt—Bachelor” for water generation purposes. Refer to Exhibit 6, Line Item 105.

^d 1 Bedroom units considered as “Residential: Apt—1 BDR” for water generation purposes. Refer to Exhibit 6, Line Item 106.

^e 2 Bedroom units considered as “Residential: Apt—2 BDR” for water generation purposes. Refer to Exhibit 6, Line Item 107.

^f Maintenance office, Residential workspace, Conference rooms, Copy room, Leasing room, Management Office, and Office space considered as “Office Space” for water generation purposes. Refer to Exhibit 6, Line Item 95.

^g Lobby, FCC, Package Room, Storage, Mailroom, and Parcel Lockers considered as “Lobby Space” for water generation purposes. Refer to Exhibit 6, Line Item 76.

^h Pool Generation calculated using provided pool dimensions: 15’ x 83’.

Table 21 (Continued)
Estimated Proposed Water Consumption

Land Use	Water Consumption (gpd/1,000 gr sf)	Quantity	Total Consumption (gpd) ^a
ⁱ Spa Generation calculated using provided Spa dimension on 3rd Level and Roof Option, 12' x 12'. ^j Café/Bar considered as "Bar: Cocktail, Public Table Area" for water generation purposes. Refer to Exhibit 6, Line Item 14. ^k Fitness Room considered as "Health Spa/Club" for water generation purposes. Refer to Exhibit 6, Line Item 61. ^l Lounge Space considered as "Lounge" for water generation purposes. Refer to Exhibit 6, Line Item 78. ^m Irrigation Demand provided by Landscape Architect. Water use estimate per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. ⁿ Proposed Swimming Pool and Spa water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. Source: KPFF, 333 South Hope Street Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy, 2022.			

259.8 mgd.⁶¹ Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 190.2 mgd.⁶²

As shown in Table 22 on page 95, based on sewage generation factors established by LASAN, the Project would generate a net increase of approximately 94,715 gallons of wastewater per day, or approximately 0.06 mgd, upon completion. The Project's average daily wastewater flow of 0.09 mgd would represent approximately 0.05 percent of the current 190.2 mgd available capacity of the HWRP.⁶³ Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

A Wastewater Service Information (WWSI) response, included as Exhibit 3 of the Utility Report, was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system and the Project's estimated wastewater flow, the City determined that the existing capacity of the sewer system may be able to accommodate the additional wastewater infrastructure demand created by the Project. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, Project-generated wastewater would be accommodated by the existing treatment system.

⁶¹ LASAN, One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan, Table ES.1, April 2018. Based on a straight-line interpolation of the projected flows for the HWRP for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2022 value is $[(275 \text{ mgd} - 256 \text{ mgd}) \times 10] \div 2 + 256 = 259.8 \text{ mgd}$

⁶² $450 \text{ mgd} - 259.8 \text{ mgd} = 190.2 \text{ mgd}$

⁶³ $94,715 \text{ gpd} \div 190,200,000 \text{ mgd} \times 100 = 0.049 \text{ } (\sim 0.05\%)$

Table 22
Estimated Proposed Wastewater Generation

Land Use	Sewage Generation (gpd/1,000 gsf)	Quantity	Total Generation (gpd) ^a
Existing Development Area			
Underground Parking Structure	20 kgsf	242,740	4,855
Concourse Level—Office Spaces	120 kgsf	22,052	2,646
Existing Total Wastewater Generation			7,501
Proposed Development Area			
Cooling Tower ^b	4701	1	4701
Residential: Apt—Bachelor ^c	75 du	76	5,700
Residential: Apt—1 BDR ^d	110 du	222	24,420
Residential: Apt—2 BDR ^e	150 du	68	10,200
Office Space ^f	120 kgsf	1,338	161
Lobby Space ^g	50 kgsf	2,305	115
Pool ^h	7.48 cfm	6,225	46,563
Spa ⁱ	7.48 cfm	1,159	8,669
Café/Bar ^j	720 kgsf	425	306
Fitness Room ^k	650 kgsf	2,070	1,346
Lounge Space ^l	50 kgsf	704	35
Proposed Total Wastewater Generation			102,216
Net Increase in Wastewater Generation			94,715

cf = cubic feet

du = dwelling units

gpd = gallons per day

gsf = gross square feet

kgsf = 1,000 gross square feet

^a LASAN Sewage Generation Factor Exhibit 6.

^b Cooling Tower Demand provided by Glumac: 1,715,900 gal per year.

^c Studio unit considered as “Residential: Apt—Bachelor” for sewage generation purposes. Refer to Exhibit 6, Line Item 105.

^d 1 Bedroom units considered as “Residential: Apt—1 BDR” for sewage generation purposes. Refer to Exhibit 6, Line Item 106.

^e 2 Bedroom units considered as “Residential: Apt—2 BDR” for sewage generation purposes. Refer to Exhibit 6, Line Item 107.

^f Maintenance office, Residential workspace, Conference rooms, Copy room, Leasing room, Management Office, and Office space considered as “Office Space” for sewage generation purposes. Refer to Exhibit 6, Line Item 95.

^g Lobby, FCC, Package Room, Storage, Mailroom, and Parcel Lockers considered as “Lobby Space” for sewage generation purposes. Refer to Exhibit 6, Line Item 76.

^h Pool Generation calculated using provided pool dimensions with an assumed depth of 5 feet.

ⁱ Spa options on Level 3 and Roof Floor Plan per Architect Request. Minimum Dimensions of 12' x 12' x 3.5' assumed, along with 15 percent over-estimation per Architect request.

^j Café/Bar considered as “Bar: Cocktail, Public Table Area” for sewage generation purposes. Refer to Exhibit 6, Line Item 14.

^k Fitness Room considered as “Health Spa/Club” for sewage generation purposes. Refer to Exhibit 6, Line Item 61.

Table 22 (Continued)
Estimated Proposed Wastewater Generation

Land Use	Sewage Generation (gpd/1,000 gsf)	Quantity	Total Generation (gpd) ^a
ⁱ Lounge Space considered as “Lounge” for sewage generation purposes. Refer to Exhibit 6, Line Item 78. ^m Pool and Spa Generation equals to 7.48 gal/1 cf, per WWSI. Source: KPFF, 333 South Hope Street Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy, 2022.			

Stormwater

Construction

The Project would implement an Erosion Control Plan that specifies Best Management Practices (BMPs) and erosion control measures to be used during construction to manage runoff flows. Therefore, there would be no incremental increase in runoff volumes during construction of the Project. Additionally, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on or off-site. As such, Project construction would not create runoff that would exceed the capacity of existing or planned drainage systems and no new or relocated stormwater facilities would be required during construction.

Operation

The entire Project Site is virtually impervious in the existing condition. Although the Project would provide landscaping on the Plaza Level and incorporate planters in amenity spaces on the roof, the proposed uses would be supported mostly by the structure below which prohibits storm water from percolating into the ground. Therefore, at buildout of the Project, the Development Area would be comprised of approximately 100-percent impervious areas. Accordingly, there would be no incremental increase or decrease in the imperviousness of the Development Area. In addition, with the introduction of stormwater BMPs, the Project would control stormwater runoff and ultimately result in a minor decrease in flow and volume discharging from the Project Site. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. As such, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems.

Electricity

Construction

The existing power service in the vicinity of the Project Site is supplied by LADWP. Construction activities would require minor quantities of electricity for lighting, equipment, and construction trailers. Overall, demolition and construction activities would require minimal electricity consumption. As described below, LADWP’s existing electrical infrastructure currently has enough capacity to provide service for the Project, and since the demand for electricity during construction would be minimal, there is also enough capacity to provide service for construction activities. The demand would be supplied from existing electrical services within the Project Site and would not affect other services.

Operation

Operation of the Project would require electricity for the residential and commercial uses on-site. As discussed in the Utility Report, the Project's operational electricity usage would be approximately 2,506,171 (kilowatt hour) kWh per year, which is less than 0.01 percent of LADWP's projected peak demand for 2026 (the Project's buildout year).⁶⁴ Additionally, LADWP has confirmed that there is sufficient capacity to serve the Project's electricity demand. The will-serve letter from LADWP is included as Exhibit 4 of the Utility Report included as Appendix G of this document. Furthermore, the Project would implement any necessary new lines, connections, and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project.

Natural Gas

Construction

No demand for natural gas would be generated by construction and no impact to the capacity of existing natural gas lines in the Project vicinity during construction. However, the Project would require construction of new natural gas mains to serve the new building. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site.

Operation

As discussed in the Utility Report, the Project-related annual natural gas demand of 3,234,134 (cubic foot) cf per year would represent approximately 0.01 percent of the remaining available capacity in 2026 (the Project's buildout year). Additionally, SoCalGas has also confirmed that the Project's natural gas demand can be served by the facilities in the Project area. The will-serve letter from LADWP is included as Exhibit 5 of the Utility Report included as Appendix G of this document. Furthermore, the Project would implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve the Project.

Telecommunication Facilities

The Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would ensure safe pedestrian access is maintained throughout construction, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site

⁶⁴ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities.

Solid Waste

The Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, and private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁶⁵ Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.⁶⁶ In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on the 2019 Countywide Integrated Waste Management Plan (CIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was 10.70 million tons in 2019. The total remaining permitted Class III landfill capacity in the County is estimated at 148.40 million tons, with a total estimated daily disposal rate of 34,305 tons per day, and the remaining lifespan of each landfill ranges from 9 to 36 years. In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day. Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁶⁷

Based on the 2019 CIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2034 will exceed the remaining permitted Class III landfill capacity. Therefore, the 2019 CIWMP Annual Report evaluates seven scenarios to increase capacity and determined the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six of the seven scenarios. The 2019 CIWMP Annual Report concludes that in order to maintain adequate disposal capacity, individual jurisdictions

⁶⁵ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁶⁶ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The nine Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁶⁷ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out-of-county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁶⁸ The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills.⁶⁹ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operational solid waste generation and disposal.

Construction

As summarized in Table 23 on page 100, the Project would remove approximately 22,052 square feet of the existing Concourse Level and construct 366 multi-family residential units with associated amenities and a ground floor café, with a total proposed new floor area of 309,160 square feet. Pursuant to the recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.

After accounting for mandatory recycling, as shown in Table 23, the Project would result in approximately 596 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons.⁷⁰

It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

⁶⁸ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed April 1, 2021.

⁶⁹ LASAN, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed April 1, 2021.

⁷⁰ $(596 \text{ tons} \div 58.84 \text{ million tons}) * 100 = 0.001 \text{ percent}$.

Table 23
Project Demolition and Construction Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf) ^a	Total (tons)
Demolition Waste			
Concourse Level (Office Space)	22,052 sf	155	1,709
<i>Total Demolition Waste</i>			<i>1,709</i>
Construction Waste			
Residential	308,735 sf (366 du)	4.38	676
Commercial (café)	425 sf	4.38	1
<i>Total Construction Waste</i>			<i>677</i>
Total Demolition and Construction Waste (prior to diversion)			2,386
Total Disposal (After 75% Diversion)			596
<i>lbs = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, <i>Estimating 2003 Building-Related Construction and Demolition Materials Amounts</i>, Report No. EPA530-R-09-002, March 2009, Tables 4 and 6. Source: Eyestone Environmental, 2022.			

Operation

As shown in Table 24 on page 101, based on solid waste generation factors from LASAN, the Project would generate approximately 789 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not take into account AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not take into account compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

The Project's estimated solid waste disposal of 789 tons per year represents approximately 0.0006 percent of the remaining capacity (133.07 million tons) at the County's Class III landfills that serve the City.⁷¹ The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of

⁷¹ (789 tons per year ÷ 133.07 million tons) * 100 = 0.0006 percent.

Table 24
Estimated Project Solid Waste Generation

Land Use	Size	Employee Generation Rate ^a	Estimated No. of Employees	Solid Waste Generation Rate ^{b,c}	Total Generation (tons/year)
Existing to Be Removed^d					
Concourse Level (Office Space)	22,052 sf	0.004	88	0.37 tn/emp/yr	33
<i>Total Existing to Be Removed</i>					33
Proposed					
Residential	308,735 sf (366 du)	N/A	N/A	2.23 tons/du/yr	816
Commercial (café)	425 sf	0.004	2	2.98 tn/emp/yr	6
<i>Total with Implementation of Project</i>					822
Total Net Increase (prior to diversion)					789
<i>sf = square feet</i> <i>du = dwelling units</i> <i>emp = employees</i> <i>tn = tons</i> <i>yr = year</i> ^a Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020. Based on the employee generation rate of 4.0 employees per 1,000 square feet for “General Office.” ^b Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 ton per employee per year (Services—Business) for office and screening room uses, and rate of 2.98 ton per employee per year (Retail—Restaurants) for restaurant uses. ^c Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. CEQA Thresholds Guide. ^d Solid waste generated by the theater space to be removed is not included since the removal of this space will not affect the existing solid waste generation. Source: Eyestone Environmental, 2022.					

local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project’s potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2019 Annual Report, the County will continue to address landfill capacity through the preparation of ColWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 Annual Report.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project.

3.2.6 Conclusion

As demonstrated above, the Project: (1) would be consistent with the applicable general plan designation and all applicable general plan policies and zoning designations and regulations; (2) would occur within city limits on a project site of no more than five acres substantially surrounded by urban uses; (3) would be located on a site that has no value as habitat for endangered, rare, or threatened species; (4) would not result in any significant effects relating to traffic, noise, air quality, or water quality; and (5) would be located on a site that can be adequately served by all required utilities and public services. Thus, the Project is consistent with the criteria per CEQA Section 15332(a) through Section 15332(e) and qualifies for a Class 32 Categorical Exemption.

3.3 DISCUSSION OF CEQA GUIDELINES SECTION 15300.2 (EXCEPTIONS)

As previously discussed, when it is determined that a project is subject to a categorical exemption, it is not required to also determine that none of the exceptions apply. A determination that an activity is categorically exempt constitutes an implied finding that none of the exceptions to the exemptions exists. Nonetheless, to provide a conservative analysis and fully inform the decision makers and public, the Lead Agency has demonstrated below that none of the exceptions to an exemption apply to the Project.

3.3.1 Exception 15300.2(a): Location.

Classes 3, 4, 5, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment to be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project qualifies for a Categorical Exemption under Class 32 (In-fill Development Projects), as demonstrated above. Furthermore, as demonstrated herein, the Project is not located within a sensitive environment. Thus, as this exception addresses projects that qualify as a categorical exemption under Classes 3, 4, 5, and 11, Exception 15300.2(a) does not apply to the Project.

3.3.2 Exception 15300.2(b): Cumulative Impact.

All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

Notably, under the wording of this CEQA Guideline, this exception is narrower than the broad definition of cumulative impacts as defined and applied elsewhere in CEQA practice. Generally, in CEQA practice, a cumulative impact is a change that results from the incremental impact of the project in question when added to other projects. 14 Cal Code Regs §15355(b). However, in applying this exception with respect to categorical exemptions, the cumulative impact must result from “successive projects of the same type in the same place.” 14 Cal Code Regs §15300.2(b). Therefore,

the cumulative impact analysis takes into consideration the potential impacts associated with implementation of the Project in conjunction with other projects of the same type and in the same place as the Project.

From the most general context, there is a list of potentially related projects that includes the 22 projects as listed in Table 2 and shown on Figure 6 of the Transportation Assessment included as Appendix B of this document. The list of related projects is based on information provided by LADOT on June 14, 2021, Department of City Planning, and other recent studies, and includes developments within a 0.5-mile radius of the Project Site. Of these 22 projects, only 16 are considered projects of the same type (i.e., residential developments) in the same place (the area whose size and configuration depends on the nature of potential impact of the specified project under consideration) as the Project. This limited subset of projects that meet these criteria are considered the Related Projects for purposes of this cumulative impact analysis. In summary, and as demonstrated below, there are no cumulative impacts of successive projects of the same type in the same place that over time would be significant.

3.3.2.1 Transportation

Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies.

In addition to potential Project-specific impacts, the TAG requires that the Project be reviewed in combination with nearby related projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy, or ordinance. As noted above, the Project would not preclude the City from serving the City's transportation needs as defined by the City's adopted programs, plans, ordinances, and policies. Therefore, the Project, together with the Related Projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Threshold T-2: Causing a Substantial VMT.

Pursuant to the TAG, cumulative effects of development projects are determined based on the consistency with the air quality and GHG emissions reduction goals of the Southern California Association of Governments' (SCAG's) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Adopted September 3, 2020, in terms of development location, density, and intensity. The RTP/SCS presents a long-term vision for the region's transportation system through Year 2045 and balances the region's future mobility and housing needs with economic, environmental, and public health goals.

As detailed in the TAG, for projects that do not demonstrate an impact by applying an efficiency based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. The Project would not result in a significant VMT impact, as described above. Further, the Project would be designed to further reduce single-occupancy vehicle trips to the Project Site through TDM strategies, including provisions of LAMC-required bicycle parking and a bicycle repair station. Therefore, the Project is not anticipated to result in a cumulative VMT impact under Threshold T-2.

Moreover, as previously detailed, the Project area is well-served by various transit lines. Thus, the Project encourages a variety of transportation options and is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region. The Project would also contribute to the productivity and use of the regional transportation system by providing housing near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, consistent with RTP/SCS goals. Therefore, the Project would not result in a cumulative VMT impact under Threshold T-2.

Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use.

In addition to potential Project-specific impacts, the TAG requires that the Project be reviewed in combination with Related Projects with access points along the same block as the proposed project to determine if there may be a cumulatively significant impact. There are currently no identified Related Projects proposed with access points along the same block of the Project. Therefore, the Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts.

Overall, based on the above, the cumulative transportation impact from successive projects of the same type in the same place over time would not be significant.

3.3.2.2 Noise

Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. Of the 21 related projects, 17 related projects are located more than 1,000 feet from the Project and with intervening building structures, which and therefore would not contribute to the cumulative on-site construction noise impacts. The following four related project are located within 1,000 feet of the Project Site, which could contribute to the cumulative construction noise impacts.

Related Project No. 13 (residential development) is located at 350 Figueroa Street, approximately 120 feet west of the Project Site. However, the construction area of the Related Project No. 13 is located approximately 450 feet from the Project development site and is shielded by the existing eight-story building along the west side of Flower Street. As provided in Related No. 13 noise analysis, construction noise impacts would be less than significant at the nearest noise sensitive receptor.⁷² In addition, the Project-related construction noise levels at the nearest noise sensitive receptor located between the Project and the Related Project No. 13 (receptor R2) would be 12.3 dBA below the significance criteria. Per Caltrans, when two noise levels are 10 dB or more apart, the lower value does not contribute significantly to the total noise level. Therefore, the Project would not

⁷² City of Los Angeles, 350 South Figueroa Project Sustainable Communities Environmental Assessment, Chapter 6.13 Noise, May 2020.

contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 13.

Related Project No. 14 (LA Grand Hotel, hotel and residential development) is located at 333 Figueroa Street, approximately 550 feet west of the Project Site. Related Project No. 14 is shielded from the Project Site by the existing building located along the east side of Figueroa Street. In addition, the Project-related construction noise levels at the nearest noise sensitive receptor located between the Project and Related Project No. 14 (receptor R2) would be 12.3 dBA below the significance criteria. Per Caltrans, when two noise levels are 10 dB or more apart, the lower value does not contribute significantly to the total noise level. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 14.

Related Project No. 15 (Grand Avenue Project, hotel and residential development) is located at 100 S. Grand Avenue 237 Grand Avenue, approximately 730 feet northeast of the Project Site. However, Related Project No. 15 was recently constructed and was issued a temporary certificate of occupancy in December 2022. Therefore, Related Project No. 15 would not contribute to cumulative construction-related noise impacts.

Regional Connector Transit Corridor Project, an underground rail project, along Flower Street. Per Metro, the Regional Connector Transit Corridor Project was 90 percent completed during initial stages of environmental review and is now completed.⁷³ Therefore, Regional Connector Transit Corridor Project would not contribute to cumulative construction-related noise impacts.

Operational Noise

Due to provisions set forth in the LAMC that limit stationary source noise from items, such as rooftop mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, as discussed above, noise impacts associated with operations within the Project Site would be less than significant. Therefore, based on the distance of the related projects from the Project Site and the operational noise levels associated with the Project, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

The Project and related projects in the area would produce traffic volumes (off site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from “Existing” conditions to “Future Plus Project” conditions to the applicable significance criteria. Table 11 on page 19 presents the cumulative off-site traffic noise impacts. As indicated in Table 11, the estimated increase in traffic-related noise levels due to cumulative traffic volumes would result in a maximum noise increase of 1.3 dBA along the roadway segment of along the roadway segment for 3rd Street (between Figueroa Street and Flower Street), which would be well below the 3-dBA CNEL significance criteria. The cumulative traffic noise increase at other analyzed roadway segments would be 1.0 dBA or lower.

⁷³ Metro, Regional Connector Transit Project, Status, www.metro.net/projects/connector-2/#status.

Therefore, off-site traffic noise impacts associated with the cumulative traffic would be less than significant.

Construction Vibration

Ground-borne vibration decreases rapidly with distance. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site (i.e., within 20 feet as related to building damage and 80 feet as related to human annoyance at residential uses).⁷⁴ As indicated above, the closest related project, Related Project No. 13, is approximately 450 feet from the Project development site. Therefore, due to distance attenuation cumulative construction vibration impacts would not be expected from the concurrent construction of the Project and Related Project No. 13. As such, potential cumulative construction vibration impact with respect to both building damage and human annoyance associated with on-site construction would be less than significant.

Overall, based on the above, the cumulative noise and vibration impact of successive project of the same type and in the same place over time would not be significant.

3.3.2.3 Air Quality

As discussed in Section 3.2.4 above, the Project's construction and operational-related regional air quality emissions, localized emissions, and emissions of TACs would be less than significant. Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.⁷⁵ However, those projects that do not exceed the thresholds would not be cumulatively considerable. Therefore, since the Project would not produce VOC, NO_x, CO, SO_x, PM_{2.5}, and PM₁₀ emissions in excess of SCAQMD's significance thresholds, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable. As such, the cumulative air quality impact of successive projects of the same type in the same place over time would not be significant.

3.3.2.4 Water Quality

The Project and all of the related projects are located in a highly urbanized area where the surrounding properties are developed. The existing storm drain system serving the area has been designed to accommodate runoff from an urban built-out environment. Furthermore, the Project, as well as other development projects in the area, would be required to comply with applicable regulatory requirements regarding water quality, as applicable, including implementation of a SWPPP, and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would ensure that water quality impacts would be minimized. Therefore, the

⁷⁴ Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 72 VdB significance threshold with respect to human annoyance and 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage (i.e., historic structures).

⁷⁵ SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, August 2003.

cumulative water quality impact of successive projects of the same type and in the same place over time would not be significant.

3.3.2.5 Public Services

Fire Protection

The increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the fire stations that serve the Project Site would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each related project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects, as well as other future developments, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations.

In addition, as with the Project, the related projects and other future development projects in the vicinity, would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Cumulative increases in demand for fire protection services due to related projects and other future development projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Thus, the cumulative impact to fire protection services from successive projects of the same type in the same place over time would not be significant.

Police Protection

All of the Related Projects fall within the boundaries of the Central Community Police Station. It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the

desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact to police protection services from successive projects of the same type in the same place over time would not be significant.

Schools

Each of the Related Projects are located within the boundaries of LAUSD, and most include a residential component. As discussed above, in accordance with SB 50, payment of developer impact fees would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully mitigate any potential impacts to school facilities. Thus, the cumulative impact to schools from successive projects of the same type in the same place over time would not be significant.

Parks

Similar to the Project, the related projects in the area would be required to pay park fees pursuant to LAMC Section 12.33, as appropriate to the projects' location and proposed uses. The payment of fees would mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact to parks from successive projects of the same type in the same place over time would not be significant.

Other Public Facilities: Libraries

The residential population of a library's service area is the primary metric used by the Los Angeles Public Library (LAPL) for assessing the adequacy of library services and planning for future growth (i.e., citing of new facilities). However, the recommended building size standards are not a threshold under CEQA or LAPL and there is no requirement to build new facilities or expand existing facilities when the recommended building size standards are not met. Furthermore, LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community. Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Similar to the Project, the related projects in the area would be required to pay the required City fees. Thus, the cumulative impact to libraries from successive projects of the same type in the same place over time would not be significant.

3.3.2.6 Utilities

Water

The Project, along with the related projects, would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of an IFFAR and SAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands. In addition, LADWP will continue

to implement and update its Water Infrastructure Plan (WIP), with the current (2018–2019) WIP containing a five-year water system capital improvement plan that includes \$6.3 billion for needed water system infrastructure improvements and maintenance.⁷⁶ With regard to water supply, LADWP, as a public water service provider, is required to prepare and periodically update its Urban Water Management Plan (UWMP) to plan and provide for water supplies to serve existing and projected demands. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Implementation of the Project in combination with the related projects along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. It is unknown whether or not the related projects or other developments in the LADWP service area have been taken into account in the 2020 UWMP. Nonetheless, it can be assumed that any development projects that are not included in the 2020 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a Water Supply Assessment (WSA) pursuant to SB 610 to be reviewed and certified by LADWP to demonstrate adequate water supply. Therefore, the cumulative impact to water (including water infrastructure and water supply) from successive projects of the same type in the same place over time would not be significant.

Wastewater

Under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), LASAN assesses the anticipated wastewater flows from development projects at the time of connection and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. New development projects in the vicinity of the Project Site would be required to submit a Sewer Capacity Availability Request (SCAR) or a SAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines to determine if there is adequate sewer capacity. In addition, new development projects would also be subject to LAMC Section 64.11 and Section 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with LASAN and comply with all applicable City and State water conservation programs and sewer allocation ordinances. In addition, the Project in combination with the related projects and other projects within the service area of the Hyperion Treatment Plant (HTP) would generate additional wastewater that would be treated at HTP. The HTP has a capacity of approximately 550 mgd, and currently, the remaining available capacity at the HTP is approximately 250 mgd. The Project would increase sewer demand by less than one

⁷⁶ LADWP, 2018–2019 Water Infrastructure Plan, https://ladwp-jtti.s3.us-west-2.amazonaws.com/wp-content/uploads/sites/3/2020/02/11170353/Water-Infrastructure-Report-Plan-2018-19_FINAL.pdf, accessed May 17, 2022.

percent of the Hyperion Service Area capacity. Thus, it can be assumed that the related projects, which largely consist of multi-family residential uses similar to the Project, would generate similar sewer demand. As with the Project, the related projects would have to demonstrate that the existing capacity of the sewer system would be able to accommodate the additional wastewater infrastructure demand created by the project. In addition, pursuant to LAMC Section 64.14, related projects would be required to obtain final approval of sewer capacity and connection permits during the Project's permitting process. Thus, the cumulative impact associated with wastewater from successive projects of the same type in the same place over time would not be significant.

Stormwater

Stormwater from each of the related projects and other nearby development projects would be collected on each of the respective sites, retained and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first 0.75 inch of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Thus, the cumulative impact associated with stormwater from successive projects of the same type in the same place over time would not be significant.

Electrical Power

Although future development would result in the irreversible use of renewable and nonrenewable electricity resources during project construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP's service area. Furthermore, like the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2015 Power Integrated Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Integrated Resource Plan incorporates the estimated electricity requirement for the Project. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area.

Overall, the cumulative impact associated with electrical power from successive projects of the same type in the same place over time would not be significant.

Natural Gas

Buildout of the Project and related projects in SoCal Gas' service area is expected to increase natural gas consumption during project construction and operation and, thus, cumulatively increase the need for natural gas supplies and infrastructure capacity. SoCal Gas' forecasts consider projected population growth and development based on local and regional plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCal Gas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. In addition, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCal Gas occur as needed. It is expected that SoCal Gas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Thus, the cumulative natural gas impact from successive projects of the same type in the same place over time would not be significant.

Solid Waste

The Project and the related projects in conjunction with growth forecasted in the County through 2026 (i.e., the Project buildout year), would cumulatively generate solid waste, thus potentially resulting in cumulative impacts on solid waste facilities. Construction of the Project and other development projects generate construction and demolition waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to a City-certified construction and demolition waste processor, it is anticipated that future cumulative development within the City would also implement similar measures to divert construction and demolition waste from landfills. As discussed above, the Azusa Land Reclamation Landfill has a remaining disposal capacity of 58.84 million tons. Thus, this landfill would be expected to have sufficient capacity to accommodate cumulative construction demand.

Operation of the Project in conjunction with the related projects would also generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. As such, the 2019 Annual Report (published in September 2020) projects waste generation and available landfill capacity through 2034.⁷⁷ According to the 2019 Annual Report, the forecasted waste generation within the County in 2026 (i.e., the anticipated Project buildout year) would be approximately 32,257,585 tons.⁷⁸ Based on a 65-percent diversion rate, as assumed in the 2019 Annual Report, an

⁷⁷ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

⁷⁸ County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2, Table 7.

estimated 11,290,155 tons of solid waste would be disposed of at Class III landfills and transformation facilities in 2027.⁷⁹ Based on the seven scenarios evaluated in the 2019 Annual Report, only Scenario I, Utilization of Permitted In-County Disposal Capacity Only, would result in a shortfall during the Project's buildout year. The remaining six scenarios, including Scenario II, Status Quo, demonstrate adequate disposal capacity. Furthermore, the Project's estimated annual solid waste disposal of 789 tons prior to diversion/recycling during operation would represent a small percentage (approximately 0.0006 percent) of the remaining capacity (133.07 million tons) at the County's Class III landfills that serve the City.

As discussed above, adequate disposal capacity would be available under six of the seven scenarios studied in the 2019 Annual Report, one of which reflects the status quo or existing conditions. Individual jurisdictions will continue to pursue the strategies set forth in the 2019 Annual Report and future annual reports in order to maintain adequate disposal capacity. Thus, the cumulative solid waste impact from successive projects of the same type in the same place over time would not be significant.

3.3.2.7 Other Cumulative Impacts

In addition to the environmental impacts areas discussed above, which are the topics that are addressed in CEQA Guidelines Section 15332(d), a brief discussion of potential cumulative effects of the other impact areas covered by CEQA is provided below.

Aesthetics

The Project and related projects are located in a dense urban area consisting of many high-rise buildings and thus would not result in an incremental intensification of land uses in the Project vicinity. Due to the build out nature of the area, the Project and related projects would not impact a scenic vista. Furthermore, the Project and the related projects would be required to comply with applicable City regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design. Therefore, the cumulative aesthetic impact from successive projects of the same type in the same place over time would not be significant.

Agricultural and Forest Resources

The Project and the related projects are located within Downtown Los Angeles, which does not support existing farming, agricultural, or forest-related operations. Therefore, development of the related projects together with the Project would not result in a cumulative impact to agricultural or forest resources.

Biological Resources

As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the related projects would comply with applicable regulatory

⁷⁹ County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2, Table 8.

requirements regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City's regulations regarding protected trees and the removal of street trees. Thus, no cumulative impact associated with biological resources would occur.

Cultural Resources

As discussed in Section 3.3.6 below, the Project would not result in any significant direct or indirect impacts to historical resources. Furthermore, the Project would not substantially change the existing look and feel of the surrounding area to the extent that the significance of any nearby historical resource would be impaired. Additionally, the Project Site is not located within the boundaries of a designated historic district, so there would be no potential to contribute to cumulative impacts on a historic district. Furthermore, the Project would not diminish the number or significance of historical resources of the same property type, as the Project would not remove a historical resource. Therefore, the cumulative impact associated with historic resources from successive projects of the same type in the same place over time would not be significant.

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within a highly urbanized area that has been disturbed and developed over time. In the event that archaeological resources and/or human remains are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that the City's standard Condition of Approval regarding inadvertent discovery of archaeological or tribal cultural resources would be applied, as necessary. Thus, the cumulative archaeological resources impact from successive projects of the same type in the same place over time would not be significant.

Geology and Soils

Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. As with the Project, related projects and other future development project would be required to comply with existing regulatory requirements and the City's grading permit review and approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular related project site. In addition, in the event that paleontological resources are uncovered, each related project would be required to comply with the applicable regulatory requirements, and the City's standard Condition of Approval regarding inadvertent discovery of paleontological resources would apply. Thus, the cumulative geology and soils impact would be less than significant.

Greenhouse Gas Emissions

The analysis of a project's greenhouse gas (GHG) emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. It is expected that the Project and the related projects would be consistent with statewide, regional, and local plans adopted for the reduction of GHG emissions, including the regulatory requirements to reduce GHG emissions from the land use and transportation sectors by

2035 in SCAG's 2020–2045 RTP/SCS, and the aspirations of the City's Green New Deal, which includes specific targets related to housing and development, and mobility and transit. Thus, it is expected that the cumulative GHG impact from successive projects of the same type in the same place over time would not be significant.

Hazards and Hazardous Materials

Development of the Project in combination with the related projects has the potential to increase the risk of an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, and would be required to comply with all applicable local, state, and federal laws, rules and regulations. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Thus, the cumulative impact associated with hazards and hazardous materials from successive projects of the same type in the same place over time would not be significant.

Land Use and Planning

As with the Project, the related Projects would be required to comply with relevant land use plans, policies, and regulations. Thus, it is expected that the cumulative land use and planning impact from successive projects of the same type in the same place over time would not be significant.

Mineral Resources

Should any of the related project sites contain mineral resources of local or regional importance, regulatory measures would be followed to ensure no significant impacts would occur. Thus, the cumulative impact associated with mineral resources from successive projects of the same type in the same place over time would not be significant.

Population and Housing

It is not expected that the Project and the related Projects would induce population growth beyond that included in the SCAG 2045 population projections contained in the 2020–2045 RTP/SCS. Thus, the cumulative population and housing impact from successive projects of the same type in the same place over time would not be significant.

Tribal Cultural Resources

The Project and the related projects are located within a highly urbanized area that has been disturbed and developed over time. Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected the same tribal cultural resources and communities. In the event that tribal cultural resources are uncovered, the Project and each related project would be required to comply with the applicable regulatory requirements regarding inadvertent discovery of tribal cultural resources. Therefore, the cumulative impact associated tribal cultural resources from successive projects of the same type in the same place over time would not be significant.

Wildfire

The Project and related projects are located in highly urbanized downtown area and would not contain wildland features or be located adjacent to any wildland areas. The Project, and all related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. Thus, the no cumulative wildfire impact from successive projects of the same type in the same place over time would occur.

3.3.3 Exception 15300.2(c): Significant Effect

A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The substantial evidence in the record demonstrates that there is not a reasonable possibility that the Project would have a significant effect on the environment due to unusual circumstances. The Project consists of infill development on a site that is currently developed with an office tower, subterranean parking, and hardscaping and landscaping. The Project is located in Downtown Los Angeles, which is highly urbanized and built out. As analyzed in Section 3.2.4 above, no significant impacts related to traffic, noise, air quality, water quality, public services, and utilities would occur as a result of the Project. Furthermore, as discussed in Section 3.2.1, the Project would be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. In addition, as discussed in Section 3.2.3, The Project Site is not located in or adjacent to any wetlands, riparian habitat, sensitive natural community or within an adopted conservation plan or natural community. Furthermore, as outlined below, the Project Site is not located along a state scenic highway, and the Project would not have a significant impact on historical resources.

The City has determined that the Project qualifies for a Class 32 Categorical Exemption for in-fill development projects. Accordingly, the analysis here considers whether the Project's circumstances (a) differ from the general circumstances of projects covered by a particular categorical exemption (in-fill development in this case); and (b) those circumstances create a significant environmental risk that does not exist for the general class of projects covered by a Class 32 exemption.

Regarding the first prong of the analysis, the Project is the epitome of an urban in-fill development because it is located in the central business district of downtown Los Angeles and is surrounded by existing urban infrastructure and similar urban developments, including high rise commercial and residential buildings. The Project Site has unused development rights and certain areas of the site are underutilized, which is the typical scenario for urban redevelopment to occur. These general circumstances exist on the Project Site, as they do in many similarly-situated urban in-fill development sites in the City that propose high rise redevelopment. In addition, as demonstrated herein, and based on the substantial evidence in the record, the Project qualifies under each of the criteria of CEQA Guidelines 15332 for an urban infill exemption.

Regarding the second prong of the analysis, the City considered evidence in the record to determine that the circumstances associated specifically with the Project Site do not create a significant environmental risk, based on unusual circumstances, as follows.

A Phase I Environmental Site Assessment Report (Phase I ESA) was prepared for the Project by Citadel EHS, dated December 2022. In addition, a Technical Memorandum (Methane Report) was prepared for the Project by Terra-Petra Environmental Engineering dated January 2022. These reports are included in Appendix I and Appendix J of this document. The Phase I ESA included site utilization and site reconnaissance to identify potential on-site hazards. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. Based on testing and inspection, reviews of historical documents, and present conditions on the Project Site, the Phase I ESA determined there is no evidence for designating the Project Site as a recognized environmental condition or a controlled recognized environmental condition. With regard to hazardous waste generation, handling and disposal, all potentially hazardous materials used during construction and operation of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and managements of hazardous materials. With regard to asbestos or asbestos-containing materials and lead based paint, a very limited amount of demolition would occur within the existing subterranean parking structure to accommodate structural components of the Project. Thus, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos-containing materials or lead based paint into the environment. With regard methane, the Project Site is located within a City of Los Angeles Designed Methane Buffer Zone.⁸⁰ As outlined in the Methane Report included in Appendix J, in the vicinity of the Project Site, methane soil gas concentrations would likely be well below the thresholds and as a mandatory part of complying with applicable building codes, the Project would be designed in accordance LAMC Section 91.7104 in any scenario and that would ensure that any impacts associated with methane would be less than significant and not create a significant environmental risk.

As discussed below, the record contains a detail technical report that analyzed whether the Project has a reasonable possibility of having a significant effect on historical resources due to the Project Site being included in Survey LA. As demonstrated in the Historical Resources Impact Assessment, the Project would not have direct or indirect impacts on a historical resources. The existing office tower and Plaza on the Project Site would continue to reflect the physical qualities associated with commercial development in downtown Los Angeles during the 1970s. The Project Site would continue to retain integrity of location, design, setting, materials, workmanship, feeling, and association, and as a result, would continue to convey its original historic identity and significance as an important example of a 1970s corporate office tower reflecting the aesthetic of Corporate International architecture and associated landscape design. Thus, the property would remain eligible for the California Register after implementation of the Project. Therefore, the Project would not directly or indirectly cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. The City's Office of Historic Resources reviewed the Historical Resources Impact Assessment and concurred that, in its expert opinion, the Project would not have a significant impact on a historical resources because the construction and operation of the Project would neither materially impair the significance of an historical resource nor cause a substantial adverse change in the significance of any historical resource.

⁸⁰ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed May 3, 2022.

As analyzed in the Preliminary Geotechnical Investigation prepared for the Project by Geotechnologies, Inc., dated October 2021, which is included as Appendix H of this document, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects related to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides. Additionally, the Project Site is not located on a geologic unit that is unstable, or that would become unstable as a result of the Project. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as designated by the California Geological Survey. In addition, the Project Site is not located within a City-designated Fault Rupture Study Area and no known active faults underlie the Project Site. In addition, the potential for liquefaction to occur on the Project Site is considered to be very low and seismically-induced settlement is also not expected to occur. Project design and construction would comply with all applicable regulatory requirements, including the California Building Code and the LAMC. Furthermore, the Project would provide a final design-level geotechnical report, subject to Los Angeles Department of Building and Safety (LADBS) review and approval, prior to the issuance of grading permits for the Project. Therefore, no significant effects on the environment due to unusual circumstances associated with geological conditions would occur as a result of the Project.

Conclusion

Overall, based on the above, there is not a reasonable possibility that the Project would have a significant effect on the environment due to unusual circumstances. As such, Exception 15300.2(c) does not apply to the Project.

3.3.4 Exception 15300.2(d): Scenic Highways

Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The Project Site is not along a state scenic highway. The nearest officially designated state scenic highway is California State Route 2 (SR-2), which is located approximately 12.5 miles northeast of the Project Site.⁸¹ Thus, the Project would not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. Thus, Exception 15300.2(d) does not apply to the Project.

3.3.5 Exception 15300.2(e): Hazardous Waste Sites.

A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. The provisions in Government Code Section 65962.5 are

⁸¹ Caltrans, Scenic Highways, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed January 6, 2023.

commonly referred to as the “Cortese List.” The list is developed with input from the State Department of Health Services, State Water Resources Control Board, California Integrated Waste Management Board, and Department of Toxic Substances Control. Based on the review of regulatory agency database records included in the *Phase I Environmental Site Assessment Report* (Phase I ESA) prepared for the Project by Citadel EHS dated October 2021, which is included as Appendix I of this document, including the Cortese List, the Site is not a known hazardous waste site and is not otherwise identified as a Cortese List site. Thus, the Project is not located on a site that is included on any list compiled pursuant to Government Code Section 65962.5, and Exception 15300.2(e) does not apply to the Project.

3.3.6 Exception 15300.2(f): Historical Resources

A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so, (2) a determination of whether the proposed project will result in a “substantial adverse change” in the significance of the resource or resources. A “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 an historical resource would be materially impaired (CEQA Guidelines 15064.5(b)(1)). Material impairment of a historical resource occurs when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and entitle it to be included in the California Register of Historical Resources or similar local registers (CEQA Guidelines 15064.5(b)(2)). The analysis below is based on the Historical Resources Impacts Assessment prepared by Historic Resources Group (March 2022), included as Appendix K of this Initial Study.

Direct Impacts

The Project Site is currently developed with a high-rise office building, an outdoor plaza, and a parking structure that is located beneath most of the Project Site. The property, including the office tower, outdoor plaza, and parking structure, was designed by architects A.C. Martin and Associates and landscape architects Sasaki Walker and Associates, and was completed in 1974. The property has not undergone significant alterations since. SurveyLA, the Los Angeles Historic Resources Survey, has developed a Historic Context Statement (HCS) that provides a framework for evaluating potential historical resources in Los Angeles. The HCS is organized into nine broad historical contexts that are specific to Los Angeles and focus on the development of the City from 1780 to 1980. These contexts are further subdivided into themes and sub-themes that reflect the historical trends and patterns of events associated with each context. The Project Site was identified by SurveyLA under the context of Commercial Development (1850-1980) for its association with the redevelopment of Bunker Hill in the 1960 and 1970s and the resultant evolution of commercial architecture in downtown Los Angeles during a period of substantial corporate growth. In addition, SurveyLA identified the Project Site under the context of Architecture and Engineering (1850-1980) as an excellent and intact example of Corporate International commercial architecture in downtown Los Angeles and as the work of noted Los Angeles architectural firm, A.C. Martin and Associates. As discussed in the Historical Resources Impacts Assessment included as Appendix K of this document, the property as a whole retains integrity of location, design, setting, materials, workmanship, feeling, and association, and as a result,

continues to convey its original historic identity and significance as an important example of a 1970s corporate office tower reflecting the aesthetic of Corporate International architecture and Modernist landscape design.

Development of the Project would require the removal and replacement of a portion of the Plaza, including some of the existing landscape and hardscape features, and construction of a new 34-story multi-family residential building. The Development Area is a relatively small portion of the Project Site, consisting of 24,274 square feet in the southern quadrant of the Project Site adjacent to the corner of Hope Street and 4th Street. The Project was designed to site the new residential tower in this manner to complement the existing uses on the Project Site and minimize disturbance to the existing Plaza. The removal of some of the Plaza would result in a minor change to the existing historic fabric. Additionally, the new residential tower would alter the existing condition of the Project Site and change the spatial relationships on the site. However, approximately 89 percent of the landscape, hardscape, and character-defining features of the Plaza surrounding the existing office tower will remain intact and unaltered. Additionally, approximately 80 percent of the main Plaza area, located south of the office tower, will also remain unaltered. The Project would not alter in any way the office tower itself. The portion of the Plaza that would be altered by the Project would be replaced by new paving, hardscaping, and landscaping that would recreate the shape and dimensions of the existing design, thereby memorializing the original design and symmetry of the Plaza. Thus, the original plan, setback, form, and massing of the office tower would remain intact and unaltered.

Furthermore, a majority of the character-defining features of the Plaza's original design would be retained, including the distinct zones, symmetrical ground plane organized along a central axis, transitions to interior spaces set at grade, the use of geometric forms in features and edge conditions, round and semicircular water features fed by canals, edge conditions defined by raised borders and low walls, round or rectangular raised planters, a distinct interior tree program, and Calder's *Four Arches* sculpture.

Construction of the Project in the Development Area would require temporary demolition of a portion of the Plaza to allow placement of the new residential tower. The Development Area is a minor portion of the Plaza. The Project would thereafter reconstruct that same area of disturbance in a manner that reflects the existing design of the Plaza, which thereby would not materially alter in an adverse manner the physical characteristics of the Project Site and its ability to convey historical significance. Even after development of the Project, the Project Site would still be entitled to inclusion in Survey LA, or other applicable registers, because over 80 percent of the Project Site would not be touched and the entire Project Site would still clearly convey its historical significance. Accordingly, neither construction nor operation of the Project would materially impair a historical resource.

Thus, the Project would not directly cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Indirect Impacts

The development of a 34-story residential tower on the Project Site would introduce new height and mass, thereby altering the immediate setting of the office tower and Plaza. The new building has been designed to be deferential to the commanding presence of the office tower. In addition, the base of the new building was specifically designed to touch down lightly on the Plaza, thereby

reducing the building's footprint and, thus, limiting the effect on the existing Plaza features. Furthermore, as previously discussed, the new building would be located in the southernmost portion of the Project Site, which would create space and be sensitive to the existing setting and spatial relationships on the Project Site. The new building would be subordinate to the office tower in size, scale, and massing. Specifically, the height of the new building would be approximately 421 feet from the Plaza Level as compared to the approximately 750-foot office tower. In addition, the new building would be substantially smaller in overall mass, containing 309,160 square feet as compared to 1,331,394 square feet. The design of the new building, which would incorporate an oval shape with an articulated façade, would be differentiated from the rigid rectilinear geometry of the office tower, thereby presenting a less formal counterpart to the office tower. The distinctive form and design of the office tower will remain intact, and its architectural features will remain viewable and understandable by the public. In addition, the Plaza Level of the new building will be recessed beneath the building's full volume to allow for an outdoor landscape area surrounding the new building that will seamlessly blend into the existing Plaza features. Because the office tower and majority of the surrounding plaza and landscape area would remain intact, the majority of the important features that characterize Project Site would also remain intact and unaltered. Thus, the Project would not indirectly cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Overall, based on the above, the existing office tower and Plaza on the Project Site would continue to reflect the physical qualities associated with commercial development in downtown Los Angeles during the 1970s. The Project Site would continue to retain integrity of location, design, setting, materials, workmanship, feeling, and association, and as a result, would continue to convey its original historic identity and significance as an important example of a 1970s corporate office tower reflecting the aesthetic of Corporate International architecture and associated landscape design. Thus, the property would remain eligible for the California Register after implementation of the Project. Therefore, the Project would not directly or indirectly cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 and, as such, Exception 15300.2(d) does not apply to the Project.

3.3.7 Conclusion

As demonstrated above, the Project: (1) qualifies for a Categorical Exemption under Class 32; (2) would not result in significant impacts associated with cumulative impacts of successive project of the same type and in the same place, over time; (3) would not have a significant effect on the environment due to unusual circumstances; (4) would not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway; (5) would not be located on a site that is included on any list compiled pursuant to Government Code Section 65962.5; and (6) would not directly or indirectly cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. In addition, substantial evidence in the record demonstrates that none of the exception per CEQA Section 15300.2(a) through Section 15300.2(f) are applicable to the Project. Therefore, the City finds that the Project qualifies for a Class 32 Categorical Exemption.