

APPLICATIONS



APPEAL APPLICATION Instructions and Checklist

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

PURPOSE

This application is for the appeal of Los Angeles City Planning determinations, as authorized by the LAMC, as well as first-level Building and Safety Appeals.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

- Area Planning Commission (APC) City Planning Commission (CPC) City Council
 Zoning Administrator (ZA) Director of Planning (DIR)

CASE INFORMATION

Case Number: VTTA-74786-CN

Project Address: 754 S. Hope Street; 625 W. 8th Street

Final Date to Appeal: 10/6/23

APPELLANT

For main entitlement cases, except for Building and Safety Appeals:

Check all that apply.

- Person, other than the Applicant, Owner or Operator claiming to be aggrieved
 Representative Property Owner Applicant Operator of the Use/Site

For Building and Safety Appeals only:

Check all that apply.

- Person claiming to be aggrieved by the determination made by **Building and Safety**¹
 Representative Property Owner Applicant Operator of the Use/Site

¹ Appellants of a Building and Safety Appeal are considered the Applicant and must provide the Noticing Requirements identified on page 4 of this form at the time of filing. Pursuant to LAMC Section 12.26 K, an appeal fee shall be required pursuant to LAMC Section 19.01 B.2.

APPELLANT INFORMATION

Appellant Name: Richard Becher

Company/Organization: Digital Realty

Mailing Address: 365 Main Street

City: San Francisco State: CA Zip Code: 94105

Telephone: 415-652-4213 E-mail: rbecher@digitalrealty.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

Self Other: Digital Realty

Is the appeal being filed to support the original applicant's position? YES NO

REPRESENTATIVE / AGENT INFORMATION

Representative/Agent Name (if applicable): _____

Company: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____ E-mail: _____

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? Entire Part

Are specific Conditions of Approval being appealed? YES NO

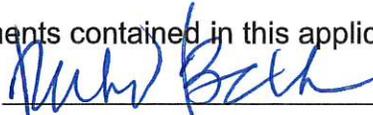
If Yes, list the Condition Number(s) here: _____

On a separate sheet provide the following:

- Reason(s) for the appeal
- Specific points at issue
- How you are aggrieved by the decision
- How the decision-maker erred or abused their decision

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature:  Date: 10/6/23

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: \$166

Reviewed & Accepted by (DSC Planner): Jason Chan

Receipt No.: 061023O3B-609EA356-E0F6-4DB9-BB03-DDF8ED9C4E98 **Date :** 10/6/23

Determination authority notified Original receipt and BTC receipt (if original applicant)

GENERAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our [Online Application System \(OAS\)](#).

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- Appeal Application
- Justification/Reason for Appeal
- Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

- Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., “Appeal Form”, “Justification/Reason Statement”, or “Original Determination Letter”). No file should exceed 70 MB in size.

3. Appeal Fee

- Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a), or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b).

4. Noticing Requirements (Applicant Appeals or Building and Safety Appeals Only)

- Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. Appellants for BSAs are considered Original Applicants.
- BTC Receipt.* Proof of payment by way of a BTC Receipt must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant to City Planning’s mailing contractor (BTC).

See the Mailing Procedures Instructions ([CP-2074](#)) for applicable requirements.

SPECIFIC CASE TYPES

ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITIES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 12.22 A.25(g).

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.
- Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 17.54 A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

BUILDING AND SAFETY APPEAL

First Level Appeal

Procedures for an appeal of a determination by the Los Angeles Department of Building and Safety (LADBS) (i.e., Building and Safety Appeal, or BSA) are pursuant LAMC Section 12.26 K.1.

- The Appellant is considered the **Original Applicant** and must provide noticing and pay mailing fees.

1. Appeal Fee

- Appeal fee shall be in accordance with LAMC Section 19.01 B.2 (i.e., the fee specified in Table 4-A, Section 98.0403.2 of the City of Los Angeles Building Code, plus surcharges).

2. Noticing Requirement

- Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per LAMC Section 12.26 K.3. Appellants for BSAs are considered Original Applicants.

- BTC Receipt.* Proof of payment by way of a BTC Receipt must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant to City Planning's mailing contractor (BTC).

See the Mailing Procedures Instructions ([CP-2074](#)) for applicable requirements.

Second Level Appeal

Procedures for a appeal of the Director's Decision on a BSA Appeal are pursuant to LAMC Section 12.26 K.6. The original Appellant or any other aggrieved person may file an appeal to the APC or CPC, as noted in the LOD.

1. Appeal Fee

- Original Applicant.* Fees shall be in accordance with the LAMC Section 19.01 B.1(a).

2. Noticing Requirement

- Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per LAMC Section 12.26 K.7. Appellants for BSAs are considered Original Original Applicants.
- BTC Receipt.* Proof of payment by way of a BTC Receipt must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant to City Planning's mailing contractor (BTC).

See the Mailing Procedures Instructions ([CP-2074](#)) for applicable requirements.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 12.27.1 C.4. Nuisance Abatement/Revocations cases are only appealable to the City Council.

1. Appeal Fee

- Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a).

For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b).



GIP 7th Street LLC
c/o Digital Realty
5707 Southwest Parkway
Building 1, Suite 275
Austin, Texas 78735

www.digitalrealty.com

October 6, 2023

Jonathan A. Hershey, AICP
Associate Zoning Administrator
Deputy Advisory Agency
Office of Zoning Administration
200 N. Spring Street, Room 763
Los Angeles, California 90012-4801
Email: jonathan.hershey@lacity.org

Re: Appeal – Case Nos.: CPC-2017-505-TDR-ZV-SPPA-DD-SPR; ENV-2017-506-EIR;
VTT-74876-CN-1A
754 South Hope Street; 609 - 625 West 8th Street, Los Angeles, CA, 90017

Mr. Hershey:

I write on behalf of Digital Realty Trust, Inc. ("**Digital**"), owner of the property located at 727 S. Grand Avenue, Los Angeles (the "**City**"), California 92651 (the "**Digital Parcel**"). The Digital Parcel's southern boundary abuts the site of a 50-story/592-foot ("**ft**") mixed-use development, comprised of 580 residential dwelling units and 7,499 square feet ("**sf**") of commercial floor area (the "**MFA Tower**" or the "**Project**"), proposed by MFA 8th Grand and Hope LLC ("**MFA**") for the property at 754 S. Hope Street and 609 and 625 W. 8th Street (the "**MFA Parcel**"). On behalf of Digital, I write to appeal (i) the two Zone Variances, two Specific Plan Project Permit Adjustments, and the Vesting Tentative Tract Map approved by the City Planning Commission ("**CPC**") and (ii) the Environmental Impact Report certified in connection with the Project.

I. INTRODUCTION.

In its letter of decision for Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR (the "**Project LOD**"), issued September 26, 2023, the CPC, in compliance with the California Environmental Quality Act ("**CEQA**"), certified the Draft Environmental Impact Report ("**DEIR**") and Final Environmental Impact Report ("**FEIR**") for the Project and purported to adopt environmental findings, a statement of overriding considerations, and a Mitigation Monitoring Program prepared for the Project. However, these actions are invalid as the Initial Study, DEIR, and FEIR: fail to adequately analyze and disclose the full impacts of the Project; discuss legally inadequate alternatives; and propose infeasible mitigation measures that, in any event, do not mitigate the Project's impacts below the level of significance. Finally, the City, as lead agency, failed to comply with the procedural requirements regarding the circulation and public review of the DEIR. For these reasons, Digital requests that the FEIR be revised, recirculated for further public review and comment, and then re-presented as required by CEQA in conjunction with any Project approvals.

In the Project LOD, the CPC also approved: (i) a Zone Variance (“**ZV**”) to allow relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction; (ii) a ZV to allow relief to allow reduced drive aisle widths of 24 feet in lieu of the required drive aisle width; (iii) a Specific Plan Project Permit Adjustment (“**SPPA**”) for a Director's Determination for an Alternative Design to allow a deviation from the Ground Floor Treatment regulations in Section 4 of the Downtown Design Guide; (iv) a SPPA to allow for a deviation from Section 5 of the Downtown Design Guide to allow building elements and balconies to project up to 9 ft and 25 ft into the sidewalk easements along Hope Street and Grand Avenue respectively, and allow projects to begin at an elevation of 25 ft above grade along Hope Street and Grand Avenue; (v) a Director's Decision to allow 79 trees to be planted on-site in lieu of the otherwise required 145 trees, and to allow an in-lieu fee to be paid for the remaining 66 required on-site trees; and (vi) a Site Plan Review (“**SPR**”) for a development project creating an increase of more than 50 dwelling units.

In its letter of decision for Case No. VTT-74876-CN-1A (the “**VTTM LOD**”), also issued September 26, 2023, the CPC, notwithstanding Digital's prior appeal, adopted: (i) Vesting Tentative Tract Map No. 74876-CN for the merger and re-subdivision of the MFA Parcel and (ii) a Haul Route for the export of approximately 89,750 cubic yards of soil from the Project site (collectively, the “**VTTM**”).

In its approval of the Project and issuance of the Project LOD and the VTTM LOD, in addition to failing to comply with CEQA, the CPC failed to proceed in the manner required by law, failed to support the decision with adequate findings, and failed to support the findings with evidence. (See Code Civ. Proc., § 1094.5(b).) The Project LOD and VTTM LOD fail to offer adequate evidence in support of their findings. Set forth below please find a detailed analysis of this Appeal.

II. THE CITY HAS FAILED TO COMPLY WITH CEQA.

A. Environmental Impacts Have Not Been Fully Analyzed and Disclosed.

The FEIR makes errors, omissions, and unexplained and unjustified assumptions in its analysis of several environmental impacts studied. Namely, land use and cultural resources are inadequately or improperly studied, and the FEIR fails to adequately analyze transportation impacts associated with the Project. As a result, the FEIR fails to fully disclose the Project's likely impacts and must be revised and recirculated.

1. Impacts on Historical Resources Are Neither Disclosed nor Fully Analyzed.

Projects that may cause a substantial adverse change in the significance of a historical resource are considered projects that may have a significant effect on the environment for CEQA purposes. (Pub. Res. Code, § 21084.1.) A historic resource is a resource listed in, or eligible for listing in, the California Register of Historic Resources (the “**Register**”). Resources listed in a local register or survey are also presumed to be historically significant unless the preponderance of the evidence demonstrates the resource is not historically or culturally significant. (Pub. Res. Code, § 21084.1; CEQA Guidelines, § 15064.5(a)(2).) Even if a resource has not been listed, or officially determined eligible for listing, in the Register or a local survey or register, the lead agency may still determine a resource is a historical resource for the purposes of CEQA. (Pub. Res. Code, § 21084.1.)

The FEIR neglects to include any discussion of the Project's impact on relevant historic and cultural resources. First, the IS concludes, without adequate analysis, that due to the Project's distance, approximately 250 ft, from the Boston Dry Goods Store, a designated City Historic Cultural Monument also known as the J.W. Robinson's Building, "the Project would not cause a substantial adverse change in the significance of a historical resource . . . and potential impacts to historical resources would be less than significant." (Initial Study [the "IS"], p. 46.) The analysis is threadbare, and no consideration is given to the impact of construction activities, noise, and vibrations.

Second, the IS, the DEIR, and the FEIR fail to include any analysis of the Project's impacts on two potentially historic structures located to the Digital Parcel's north. These structures—the Auto Center Garage located at 746 Hope Street and the Third Church of Christ, Christian Scientist Reading Room located at 730 Hope Street—were both identified by the City as potentially historic in the Historic Resources Survey Report for the Central City Community Plan Area, a copy of which is attached as Exhibit A. The Project site directly abuts the Auto Center Garage.

Notwithstanding the City's own Historic Resources Survey Report, the City, as lead agency, failed, as is required by CEQA, to evaluate in the IS, DEIR, or FEIR whether these structures are eligible for listing in the Register for purposes of CEQA. (IS, p. 46.) Because the IS, DEIR, and FEIR fail to acknowledge the potentially historic nature of these buildings, they do not study whether the Project will cause a substantial adverse change to either source by, for instance, towering over them both, creating significant construction and vibration and other construction-related disturbances that could significantly damage the structures, and demolishing a building that shares a wall with the Auto Center Garage or at minimum has a wall that is pressed up against the wall of the Auto Center Garage. This Project will be excavating to the depth of three subterranean parking levels (*i.e.*, approximately 63 ft), which could have an enormous impact on the stability of the Auto Center Garage since the wall of the garage is on the Property line. Any impact on the stability of the Auto Center Garage would amount to a substantial adverse change in the significance of a historical resource and thus would be a significant effect on the environment. (CEQA Guidelines, §15064.5(b); *Taxpayers for Accountable Sch. Bond Spending v San Diego Unified Sch. Dist.* (2013) 215 Cal.App.4th 1013, 1043.) Notwithstanding this potential for a significant impact, the IS, DEIR, and FEIR fail to even acknowledge the presence of these potentially historic structures in the vicinity of the Project.

2. *The Land Use Impacts of the Project's Significant Departure from Protective Design Standards Are Ignored.*

As the Project's DEIR recognizes, a threshold of significance for land use impacts is whether the project will "[c]ause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." (DEIR, p. IV.D-18.)

The IS, DEIR, and FEIR fail to acknowledge the tower spacing requirement set forth in the Downtown Design Guide and omit any discussion of the Project's lack of compliance with this standard in its analysis of land use impacts. The Downtown Design Guide requires that portions of a tower¹ taller than 150 ft shall be spaced 40 ft from an interior property line **when no adjacent tower exists, but one could be constructed in the future**. (See Downtown Design Guide, § 6.C.) The Downtown Design Guide clearly notes the potential environmental impacts of close tower spacing, including the minimization of views to the sky from the public realm and the

¹ As defined, a "tower" refers to portions of a building over 150 ft in height. (See Downtown Design Guide, § 6.C.)

creation of wind tunnels. (See Downtown Design Guide, § 6.C.) As proposed, the MFA Tower fails to comply with these spacing requirements, resulting in a project that will be incompatible with and will conflict with the Downtown Design Guide's tower spacing requirements, a land-use regulation adopted for the purpose of avoiding or mitigating a significant environmental impact and for ensuring the orderly development and good urban planning for a dense, infill area. The Downtown Design Guide's requirement that projects take into consideration towers that do not currently exist but could be constructed in the future is consistent with CEQA Guidelines Section 15125(a)(1), which acknowledges that the baseline environmental setting can change or fluctuate over time and that consideration of expected conditions when the project becomes operational, if supported by substantial evidence can be the appropriate baseline "where necessary to provide the most accurate picture practically possible of the project's impacts."

Specifically here, the MFA Tower directly abuts Digital's property line to the north and due to the Project's noncompliance with the spacing requirement described above, the Project will conflict with the Downtown Design Guide's tower-spacing requirements and will result in the MFA Tower being prohibitively close to Digital's proposed 13-story data center on the Digital Parcel adjacent to MFA Parcel's northerly parcel line (the "Data Center"). Digital's project application has been pending since March 31, 2023, and Digital has been discussing its project with the Project developer since May 2022. Moreover, given the age of the existing parking structure on the Digital parcel, the rapid-changing nature of downtown Los Angeles, and the narrow lots at this location, it has long been likely that another tower would be constructed directly adjacent to the MFA Tower in the near future. Yet, the CPC fails to address the Project's noncompliance with this standard, avoiding its discussion entirely, and does not even acknowledge the proposed development of the Data Center.

Accordingly, the IS, the DEIR, and the FEIR improperly omit Digital's Data Center from consideration when discussing land use and planning impacts. This conflict with the tower spacing requirements must be disclosed and analyzed in the IS, the DEIR, or the FEIR.

3. *The FEIR Fails to Include Digital's Neighboring Data Center in the Project EIR's Cumulative Impact Analysis.*

An EIR must include a discussion and analysis of significant cumulative impacts. (CEQA Guidelines, §15130(a).) The cumulative impact analysis should be based on a list of projects (considering the project together with past, present, and probable projects that produce related impacts) or a summary of projections (basing the analysis on a planning document that projects regional or areawide conditions). (CEQA Guidelines, §15130(b)(1).) Here, the DEIR identifies a list of existing and anticipated projects. (DEIR, Table III-1.)

When preparing the list of projects, a lead agency has must select a reasonable cutoff date for the future projects to include in a cumulative impacts analysis and support that determination with substantial evidence. (*South of Mkt. Community Action Network v City & County of San Francisco* (2019) 33 Cal.App.5th 321, 336.) Here, the list of projects was prepared based on information provided by the Los Angeles Department of Transportation ("LADOT") and Los Angeles City Planning ("Planning"). The City fails, however, to clearly identify in the DEIR the cutoff date for the future projects to be included in the cumulative impact analysis. Thus, the City, as lead agency, failed to select a reasonable cutoff date (indeed no cutoff date is shown), abused its discretion, and failed to support a cutoff date with substantial evidence.

Notably, the list of probably future projects omits Digital's Data Center. An entitlement application was filed for the Data Center with Los Angeles City Planning on March 31, 2023 but

Digital had been discussing the project with MFA since May 2022. And while a Notice of Preparation (“NOP”) was filed for the Project on May 10, 2019, predating Digital’s submission of an entitlement application, the Data Center should have nevertheless been considered in an updated analysis of cumulative impacts due to the potential for new significant environmental impacts, including without limitation, land use and planning impacts related to tower spacing. Given the certainty of the proposed Data Center and the length of time that MFA has known about the Data Center while MFA’s application was pending, the City’s decision to omit it entirely from its CEQA analysis is an abuse of discretion. To comport with CEQA’s underlying intent to err on the side of protecting the environment, where a developer waits four years between the NOP and taking its entitlements to hearing in a dense, urban infill area, the surrounding area will be changed during the four year pendency of the entitlements and will be unrecognizable by the time the project is approved. Therefore the CEQA analysis needs to be updated to consider the changed surroundings. Otherwise, CEQA’s purpose as a tool to disclose to the public and the decision-making body the significant environmental effects of a proposed discretionary project is defeated.

4. *Impacts on Paleontological Resources Are Not Evaluated in the FEIR.*

The IS states that the Project will involve excavation to a depth of 63 ft and that paleontological resources may be present at this depth. Nevertheless, the IS concludes that such excavation shall result in a less than significant impact provided Mitigation Measure GEO-MM-1, which sets forth procedures that apply in the event of an inadvertent paleontological discovery, is complied with. When an impact may be potentially significant, even if mitigable, and an EIR is being prepared, that issue shall be evaluated in the EIR fully. Here, these issues surrounding the impact on paleontological resources are not analyzed in the FEIR, rendering the document inadequate.

5. *Transportation Impacts Related to the Project’s Noncompliance with Driveway Standards Are Ignored.*

As the Project’s DEIR recognizes, a threshold of significance for land use impacts is whether the project will “conflict with a program, plan, ordinance or policy addressing the circulation system.” (DEIR, p. IV.G-23.) Here, the DEIR improperly concludes that the Project is consistent with the driveway standards provided in Section 321, Driveway Design of LADOT’s Manual of Policies and Procedures (“MPP 321”) and thus fails to address a potentially significant and unmitigated impact.

Section V.B of MPP 321 provides that driveways on arterial highways, such as Hope Street and Grand Avenue, serving lots with more than 250 ft of street frontage cannot be placed within 150 ft of the adjacent street. Further, Section V.D of MPP 321 states, “[w]herever possible, two-way driveways should be separated by a minimum of 50 [ft] of full height curb to minimize conflict between vehicles using the adjoining driveway.” However, Figure 0.3 in the 8th, Grand and Hope Project Transportation Assessment prepared by the Mobility Group, dated May 2020, revised December 2020 (the “**Transportation Assessment**”), and included in Appendix G of the DEIR, shows that notwithstanding the Project’s more than 250 ft of frontage on 8th Street the Project’s Grand Avenue driveway would be only 102 ft from 8th Street and the Project’s Hope Street driveway would be 114 feet from 8th Street. Both driveways are in violation of the 150 ft separation required in MPP 321 for projects, like this one, with more than 250 ft of frontage on an arterial highway. Additionally, as shown in Figure 0.2 of the Transportation Assessment, the Project’s Grand Avenue driveway would be separated by approximately 15 ft of full height curb from the existing driveway serving the parking garage on the Digital Parcel, which is far less than the 50-ft separation required in MPP 321.

The response in the Transportation Assessment provided in Table 2.1 to Guiding Question No. 15 incorrectly asserts that the requirements provided in MPP 321 for the Project driveways and described in the preceding paragraph do not apply because the Project's frontages on Grand Avenue and Hope Street are less than 250 ft in length. This obscures the reality that the Project has substantial frontage along 8th Street (over 300 ft) and is thus subject to the requirement that driveways cannot be placed within 150 ft of the adjacent street. Furthermore, driveways compliant with the driveway location requirements of MPP 321 could be placed on 8th Street. Finally, noncompliance of the proposed Grand Avenue's driveway with the driveway standards is particularly problematic because inbound and outbound Project traffic at this location would conflict with transit buses using the newly dedicated Bus-Only Lane, as well as with vehicles on southbound Grand Avenue attempting to turn right onto westbound 8th Street.

The Transportation Assessment does not explain why vehicular access to the Project via 8th Street was not considered or is infeasible. Based on the lack of justification for the Project's vehicular access scheme and its non-compliance with the design standards set forth in MPP 321, a potentially significant and unmitigated impact may result. Nevertheless, the City has left this potential impact unstudied, rendering the document inadequate.

6. *The City Failed to Evaluate the Project's Inconsistency with the General Plan Housing Element's Affordable Housing Goals and Policies.*

The CPC failed to address the Project's inconsistencies with the affordable housing policies set forth by the City's 2021-2029 Housing Element ("**Housing Element**"), which was certified by the California Department of Housing and Community Development on May 27, 2022. (See Project LOD, p. F-15.) Notably, the MFA Parcel is listed as a site for future residential development, including the development of more than one affordable unit, in the Inventory of Sites ("**Housing Inventory**") prepared and adopted in connection with the City's Housing Element. The City's Housing Element includes, but is not limited to, the following objectives and policies related to the provision of affordable housing.

Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.

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 3.2.2: 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.

Here, the Project violates these and other policies set forth in the Housing Element due to its failure to include any affordable units.

Furthermore, the Second District Court of Appeal recently overturned the City's CEQA analysis for another project for failing to analyze the project's lack of affordable housing in light of the Housing Element's affordable housing policies. "Although an agency need not make an express consistency finding [citation omitted], there must be some indication that the agency actually considered applicable policies." (*United Neighborhoods for Los Angeles v. City of Los Angeles* (2023) 93 Cal.App.5th 1074, 1097.) Here, while the Project LOD purports to evaluate

the Project's consistency with the Housing Element, it does not address how the Project's lack of affordable housing comports with the Housing Element's affordable housing goals.

B. Construction Related Vibration Impacts Associated with the Project Are Not Fully Mitigated.

CEQA requires that any mitigation measures required to minimize a project's significant environmental impact be *feasible*. (Pub. Res. Code, §§ 21002.1(a), 21100(b)(3); CEQA Guidelines, § 15126.4 [emphasis added].)

Here, the DEIR identifies as a potentially significant impact vibration-induced damage to the existing parking structure located on the Digital Parcel to the north of the MFA project site. The DEIR concludes that compliance with relevant provisions of the Los Angeles Municipal Code ("LAMC") and Mitigation Measure NOI-MM-2 will result in the mitigation of this impact to a level of insignificance. (See DEIR, p. IV.E-46.) To mitigate this impact, NOI-MM-2 requires documentation of the physical condition of the offsite properties to establish a baseline against which to measure potential vibration-induced damaged. Documentation of this baseline is to be completed from the MFA Parcel's property line and the public right of way. (See DEIR, p. IV.E-49 - IV.E-50.) However, documentation of interior structural elements of the parking garage, portions of the garage located below-grade and obscured from view, and portions of the garage located on the Digital Parcel's northern edge will be impossible and are thus not feasible. Concerns related to vibration-induced damage to these building elements that will be undocumented are particularly pronounced due to the age of Digital's building.

Thus, for NOI-MM-2 to be feasible, access to the Digital Parcel to document the existing condition will be required. Such access would require the consent of Digital. The DEIR fails to acknowledge the consent required and MFA has not obtained the required consent. If MFA does not obtain consent from Digital to inspect the parking structure there will be no baseline against which to assess potential impacts rendering NOI-MM-2 infeasible, ineffectual, and out of compliance with the requirements set forth under CEQA.

In addition, the DEIR's vibration analysis is woefully incomplete. It begins with the incorrect premise that "there are no historical resources located on or adjacent to the Project Site." (DEIR, p. IV-E-44.) As discussed above, there are two potentially historic structures that are completely ignored by the IS, DEIR, and the FEIR—the Auto Center Garage located at 746 Hope Street and the Third Church of Christ, Christian Scientist Reading Room located at 730 Hope Street. The City was required to analyze these structures as potentially historic, and thus should have evaluated the Project's potential construction and operation-related vibration impacts on these structures under the threshold for "buildings extremely susceptible to vibration damage." This is the methodology that the DEIR uses for the Boston Store-J.W. Robinson's Building, and thus would have been applied to the Auto Center Garage and Christian Scientist Reading Room had the potentially historic nature of these structures been acknowledged as required. Construction can have massive impacts on older buildings constructed under outdated standards, particularly in the case of this Project which will be excavating to the depth of three subterranean parking levels. Instead, the DEIR applies the much higher vibration significance criteria to the Auto Center Garage under an unfounded, unexplained assumption that it is a "reinforced-concrete, steel and timber building." As for the Christian Scientist Reading Room, the DEIR's vibration analysis ignores the existence of that building altogether and does not assess vibration impacts on that building at all, under any criteria. Accordingly, the DEIR's vibration analysis must be re-studied, re-analyzed, and then recirculated.

C. An Inadequate Range of Alternatives is Considered Because No Alternative is Examined that Avoids Significant Below-Grade Excavation.

CEQA requires an analysis of a reasonable range of alternatives to a proposed project, with a focus on those alternatives that would reduce or eliminate significant environmental impacts of the project. (See *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403; CEQA Guidelines, § 15126.6(a).) And although the number of alternatives required to be analyzed in an EIR is subject to a "rule of reason," the range of alternatives considered should correspond to the nature of the project and its environmental effects. (CEQA Guidelines, § 15126.6(f); *Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 565-66.)

Here, the DEIR fails to study a critical alternative, the construction of the Project with no below-grade construction. There is no effort to evaluate an alternative that reduces, or eliminates entirely, subterranean development. Although such an alternative may not completely avoid the Project's significant construction period noise and vibration impacts, eliminating subterranean development would greatly reduce the number of heavy truck trips (via the reduction in soil export), corresponding transportation impacts, and the severity of the significant construction period noise and vibration impacts. Failing to evaluate an alternative that reflects reduced transportation, noise, and vibration impacts means that decision-makers are acting blindly, without any awareness of an alternative that would avoid these impacts. Furthermore, given the proximity of potentially historic resources and unstudied yet potentially significant impacts the Project's construction and excavation will have on them, as set discussed in Section II.A and Section II.B above, the failure to evaluate an appropriate alternative that would reduce vibration and excavation risks is especially problematic and contrary to California law. Decision-makers should not approve the Project as proposed without evaluating whether there is a feasible alternative that involves less excavation and less construction, and thus fewer environmental impacts.

D. The City, As Lead Agency, Failed to Comply with CEQA's Procedural Requirements.

It is important to discuss the procedural issues associated with the environmental review of this Project. CEQA requires that the public review period for a DEIR shall be no less than 30 days and no longer than 60 days. (CEQA Guidelines, § 15105.) Indeed, CEQA further specifies that to make copies of EIRs available to the public, lead agencies should furnish copies of draft EIRs to public library systems serving the area involved. (CEQA Guidelines, §§ 15087(g), (a).)

Here, a commenter noted that they were unable to download the DEIR for review and that the City's Central Library did not have a copy available for review. In response to this comment, the FEIR notes that additional thumb drives containing the DEIR were distributed to libraries in the project vicinity. However, the FEIR preparers do not note when these thumb drives were available, nor whether they were available for the minimum 30-day period. Given this failure to make copies readily available to the public for review, the City should determine whether the DEIR was available for the legally required minimum time and, if not, should recirculate the FEIR.

E. A Change in Circumstances Necessitates Preparation of a Subsequent or Supplemental EIR.

CEQA provides that a subsequent or supplemental EIR may be required if “[s]ubstantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.” (Pub. Res. Code, § 21166(b).) Changed circumstances trigger the requirement that a subsequent or supplemental EIR be prepared if the changes will result in new or more severe significant environmental impacts requiring major revisions to the prior EIR or negative declaration for the project. (CEQA Guidelines, §15162(a)(2).) Here, because Digital has applied for the entitlement of the Data Center on the Digital Parcel additional CEQA analysis may be required because the FEIR failed to contemplate any future redevelopment of the surrounding parcels and the Data Center could result in additional significant environmental impacts.

Notwithstanding the potential for additional significant environmental impacts resulting from the Data Center, the City has thus far failed to substantiate its decision not to prepare additional environmental analysis. Instead, the CPC simply dismisses the potential necessity of preparing additional environmental analysis and fails to mention the potential impacts on the analysis of the proposed Data Center. (See VTTM LOD, F-54 – F-55.) Decision-makers should not have approved the Project as proposed without evaluating whether there are changes to the Project’s environmental impacts resulting from the future development of the Data Center.

Furthermore, the Data Center should be considered a future project for the purposes of the DEIR’s cumulative impacts analysis, as well as its Planning and Land Use analysis. (CEQA Guidelines, §15130(b)(1).) Even though preparation of the DEIR predates Digital’s submission of an entitlement application packet for the Data Center, there is no legal requirement that past, present, and probable projects that produce related impacts must be limited to those project’s proposed at the time of issuance of a NOP or preparation of a DEIR. Here, the City fails to identify a reasonable cutoff date and fails to support any selection of a cutoff date with substantial evidence. Given this failure to clearly establish a cutoff date and the potential impacts that may result from development of the Data Center alongside the MFA Tower, the City must consider the Data Center as a probably future project that could result in one or more cumulative impacts when evaluated alongside the MFA Tower.

III. THE CPC FAILED TO PROCEED IN THE MANNER REQUIRED BY LAW, FAILED TO MAKE ALL NECESSARY FINDINGS, AND FAILED TO SUPPORT THE FINDINGS WITH ADEQUATE EVIDENCE.

On July 13, 2023, the CPC approved (i) the VTTM, (ii) two ZVs authorizing relief from parking stall and drive aisle width standards (collectively, the “**Variances**”); (iii) two SPPAs authorizing changes to standards related to ground floor treatment, building / balcony projections into existing sidewalk easements, and the height above grade at which balconies can commerce (collectively, the “**SPPAs**”); (v) a Director’s Decision to allow 79 trees to be planted on-site in lieu of the otherwise required 145 trees; and (vi) Site Plan Review (collectively, the “**Project Approvals**”). In authorizing the Project Approvals, the CPC failed to proceed in the manner required by law, failed to support the decision with adequate findings, and failed to support the findings with evidence. Given the lack of evidence to support the CPC’s decisions and the failure to address all relevant laws and policies, we respectfully request reconsideration of the CPC’s action on the Project Approvals.

Outlined below, please find a detailed analysis of the legal deficiencies associated with the CPC's action.

A. The Project Fails to Qualify for a Variance.

Variations may be granted only when, because of special circumstances regarding a property, the strict application of the zoning ordinance deprives the property of privileges enjoyed by other property in the vicinity that is categorized under the identical zoning classification. (See LAMC, § 12.27(D).) Findings that highlight a desirable project design, amenities, benefits to the community, and the alleged superiority of the project design to those that could be developed without a variance are insufficient to establish the grounds necessary to grant a variance. Furthermore, the need to improve income or add value to a property does not constitute the hardship required to demonstrate the grounds necessary for approval of a variance.

Here, the CPC has failed to adequately establish the presence of special circumstances needed to authorize approval of a variance. Rather, in the findings supporting issuance of a variance the CPC provided conclusory analysis that simply restates the applicable legal standard and lists several characteristics of the MFA Parcel intended to distinguish it from surrounding, similarly situated sites. (See Project LOD, p. F-4 - F-6.) The CPC fails to provide adequate support for its conclusion that approval of the Variations is appropriate in the context of the Project. Thus, the City has failed to proceed in the manner of law, failed to support its decision with findings, and its findings are unsupported by substantial evidence. (*Topanga Ass'n for a Scenic Community v County of Los Angeles* (1974) 11 Cal. 3d 506, 514.)

B. The Project Lack Consistency with the Central City Community Plan, the Downtown Design Guide, and the City's Housing Element.

A VTTM must be designed in compliance with the zoning regulations applicable to the subject property. (LAMC, §§ 17.05(C), 17.06(B).) Similarly, SPR requires a finding that the proposed project is in substantial conformance with the purposes, intent and provisions of the City's General Plan, applicable community plan, and any applicable specific plan. (LAMC, § 16.05(F)(1).) SPR also requires a finding that the project "consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties." (LAMC, § 16.05(F)(2).) Here, as set forth in greater detail below, the CPC has failed to make the consistency findings required for approval of the VTTM and SPR.

1. Central City Community Plan.

The CPC failed to address the Project's inconsistencies with policies set forth by the Central City Community Plan (the "**Community Plan**"). The Community Plan, and its pending update, set forth countless policies and goals providing for an active and vibrant vision for Downtown Los Angeles characterized by a walkable urban environment with active streets and a mix of commercial and residential uses. For example, the Community Plan identifies the following objectives:

Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.

Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.

These and other goals, objectives, and policies recognize Downtown's status as the most prominent and diverse business and corporate center on the Pacific Rim and its role as a regional engine for growth. However, realization of this vision will be undermined if projects, like the MFA Tower, that feature construction of residential units abutting interior property lines and a lack of separation with existing or proposed buildings are allowed to restrict the development potential of surrounding sites. The Community Plan intends for Downtown Los Angeles to be fully built-out and revitalized, with parcels presenting a unified street frontage and developed with their highest and best use. Such a unified street frontage encourages the ground-floor activation and pedestrian activity in this area of the City necessary to realize the Community Plan's goals. And the full development of each parcel will result in the dense, urban, and walkable neighborhood described in City policy documents. MFA appears to ignore applicable policies, proposing a project that will constrain development of neighboring sites. Specifically, the proximity of the MFA Tower's norther façade to the property line of the Digital Parcel, in violation of the tower spacing requirements set forth in the Downtown Design Guide as described in greater detail throughout this letter, means that any future development on the site could need to be set back to avoid conflict with MFA and the future residents of the MFA Tower. The Downtown Design Guide proposed policies and standards intended to facilitate the development of all parcels in Downtown and avoid these conflicts. Here, the City, as lead agency, fails to identify how such a project can be compliant with the Community Plan, abused its discretion, and failed to support a determination of consistency with substantial evidence. *Downtown Design Guide*.

The Downtown Design Guide, which governs development of the MFA Tower, aims to prevent the development of towers in downtown that limit the redevelopment of neighboring sites through the establishment of development standards requiring tower separation. (See Downtown Design Guide, § 6.C.) Subject to certain exceptions, which are inapplicable here, a tower² taller than 150 ft, like the MFA Tower, shall be spaced 40 ft from an interior property line when no adjacent tower exists, but one could be constructed in the future. (See Downtown Design Guide, § 6.C.) This is consistent with the SPR requirement that projects "consist[] of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties."

The Project approved by the CPC is inconsistent with this key tower-spacing requirement set forth by the Downtown Design Guide. The MFA Tower directly abuts Digital's property line to the north and due to its noncompliance with the spacing requirement described above it will conflict with the Downtown Design Guide's tower-spacing requirements and thus potentially constrain development on Digital's parcel. Digital's project application has been pending since March 31, 2023, and Digital has been discussing its project with the Project developer since May 2022. Moreover, given the age of the existing parking structure on the Digital parcel, the rapidly changing nature of downtown Los Angeles, and the narrow lots at this location, it has long been likely that another tower would be constructed directly adjacent to the MFA Tower. Yet, the CPC fails to address the Project's noncompliance with this standard, avoiding its discussion entirely, and does not even acknowledge the proposed development of the Data Center. The CPC has not provided any justification or cited to any written rule or policy explaining its failure to consider the Data Center at all when assessing the MFA Tower's compliance with the Downtown Design

² As defined, a "tower" refers to portions of a building over 150 ft in height. (See Downtown Design Guide, § 6.C.)

Guide and when assessing whether the Project consists of an appropriate building arrangement and compatibility with existing and future development on adjacent properties. Accordingly, the City, as lead agency, has abused its discretion and failed to support a determination of consistency with substantial evidence.

Even though the Project applicant will argue that the Data Center should be ignored because the Project developer filed their application first, the Project developer has waited four years since their NOP was issued before bringing their Project to hearing. In a dense, infill area changing as fast as downtown Los Angeles is changing, the circumstances surrounding a proposed project will inevitably change if a developer unreasonably delays completing their entitlements as the Project developer as done here. Developers who do not diligently pursue their entitlements to completion once their application is filed should not receive a windfall and be permitted to freeze their surrounding environment for an undetermined, unreasonable length of time to the detriment of good, sound planning for downtown Los Angeles. Accordingly, the CPC's approval of SPR and the VTTM should have considered the Data Center, and because it did not, the City's determination is unsupported by and amounts to an abuse of discretion.

2. *Housing Element.*

The CPC failed to address the Project's inconsistencies with policies set forth by the Housing Element, particularly those related to the provision of affordable housing and the City's compliance with California Government Code Section 65863 ("**No Net Loss Law**"). (See Project LOD, p. F-15.) Notably, the MFA Parcel is listed as a site for future residential development, including the development of more than one affordable unit, in the Housing Inventory prepared and adopted in connection with the City's Housing Element. The City's Housing Element includes, but is not limited to, the following objectives and policies related to the provision of affordable housing.

Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.

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 3.2.2: 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.

Notwithstanding the strong policy preference for affordable housing and the Project site's inclusion on the Housing Inventory, the MFA Tower neglects to include any below-market rate units. Given this failure to include affordable units, the Project violates the policies set forth in the Housing Element. Despite this failure, the CPC omits any discussion of the Project's noncompliance with the City's housing policies and appears to dismiss the issue entirely.

Indeed, the City's failure to fully justify the Project's failure to include any affordable units runs counter to current City policy initiatives intended to spur construction of units for all community members, including Mayor Karen Bass's declaration of a local housing and homelessness emergency, which specifically found that the City "faces of critical shortage of local affordable housing." (See Declaration of Local Housing and Homelessness Emergency, July 7,

2023.) Finally, the Project's failure to include *any* affordable units renders it inconsistent with the City's identification of the MFA Parcel as a site for future residential development, including the development of more than one affordable unit, in the Housing Inventory prepared and adopted in connection with the City's Housing Element.

The CPC makes a conclusory determination without support that the Project's lack of any affordable units will not violate the state's No Net Loss Law because the City's Housing Inventory contains many potential affordable sites. (Project LOD, p. F-15.) However, without providing any analysis or facts substantiating this—for instance, how many other sites on the Housing Inventory are or are not including the number of affordable units designated in the Housing Inventory—the public cannot know if this Project contributes toward jeopardizing the sufficiency of the Housing Inventory. If every proposed project is granted a pass on including affordable units, then the Housing Inventory will quickly become inadequate to accommodate the City's Regional Housing Needs Assessment (“RHNA”) allocation. Accordingly, the CPC failed to adequately quantify the Housing Inventory's ability to meet the unmet RHNA without the Project including affordable housing.

Given the lack of sufficient analysis and adequate findings on these issues, the CPC failed to support its finding of consistency with necessary evidence.

C. The CPC Failed to Adequately Assess Future Passive or Natural Heating or Cooling Options.

The design of a subdivision for which a tentative map is required “shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision.” (Gov. Code, § 66473.1.) A tentative map of a subdivision must be disapproved if it fails to meet this design requirement. (See 64 Ops.Cal.Atty.Gen. 328.) Here, the City notes that lot layout has been considered along with the topography of the site to maximize passive or natural heating and cooling opportunities. However, applicant has not considered the proposed development of the Data Center on the adjacent site, which will necessarily impact passive or natural heating or cooling options as the building's proximity to the MFA Tower's, both of which will necessarily impact shade, prevailing breezes, and orientation. The City should request additional analysis on this issue to avoid noncompliance with the requirements of Government Code Section 66473.1.

D. The Project is Incompatible with Future Development on Surrounding Parcels.

When making the finding, required for SPR approval, that the Project is “compatible with existing and *future* development on adjacent properties and neighboring properties” the CPC must consider the Project's consistency with the future Data Center. (LAMC, § 16.05(F)(2) (emphasis added).)

At present, the Project's design fails to consider its potential impact on the surrounding parcels. Namely, the Project locates balconies and residential units immediately adjacent to the Digital Parcel's northern property line. Construction this close to property line results from an unreasonable assumption on the part of MFA that a valuable, underutilized infill site within Downtown's urban core would be left undeveloped forever and is incompatible with the future development on the Digital Parcel.

The CPC has failed to analyze the impact of the Project's failure to provide setbacks from neighboring parcels on the overall consistency of the Project with the surrounding development.

Under LAMC 16.05(F)(2) the CPC is required to analyze conformity with existing development but also with future development on adjacent parcels. Since May 2022, long before the issuance of the Project LOD, MFA has been fully aware of Digital Plan's for the neighboring parcel yet no analysis or consideration of these plans was included in the findings and justification related to the issuance of SPR approval. The CPC should request revisions to the MFA Tower to eliminate its inconsistency with the surrounding parcels or prepare written findings articulating the Project's consistency with future development on these parcels.

IV. CONCLUSION.

Given the analysis set forth above, we respectfully request that (i) the FEIR be revised, and recirculated, for additional review and comment, and that the City provide adequate evidence and findings to support its determinations regarding the Project Approvals and (ii) the review authority reconsider the Project's approval in light of the legal deficiencies related to the Project Approvals described above. Only after the Project's full impacts are disclosed, feasible mitigation measures identified, and adequate findings are made related to the Project's compliance with applicable policies and standards can the public and decision-makers be fully aware of the ramifications of the proposed MFA Tower and its impacts.

Very truly yours,



Richard Becher
Senior Director – Design, Engineering,
and Construction
Digital Realty
365 Main Street
San Francisco, California 94105

SurveyLA

Los Angeles Historic Resources Survey

Historic Resources Survey Report Central City Community Plan Area



Prepared for:

City of Los Angeles
Department of City Planning
Office of Historic Resources



Prepared by:



Architectural
Resources Group

Architectural Resources Group, Inc.
Pasadena, CA

September 2016

Table of Contents

| | |
|--|-----------|
| Project Overview | 1 |
| SurveyLA Methodology Summary | 1 |
| Project Team | 3 |
| Survey Area | 3 |
| Designated Resources | 31 |
| Community Plan Area Survey Methodology | 34 |
| Summary of Findings | 36 |
| Summary of Property Types | 36 |
| Summary of Contexts and Themes | 40 |
| Selected Bibliography | 68 |

Appendices

- Appendix A: Individual Resources
- Appendix B: Non-Parcel Resources
- Appendix C: Historic Districts and Planning Districts

Project Overview

This Historic Resources Survey Report (Survey Report) has been completed on behalf of the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) for the SurveyLA historic resources survey of the Central City Community Plan Area (CPA). This project was undertaken from September 2015 to August 2016 by Architectural Resources Group (ARG).

This Survey Report provides a summary of the work completed, including a description of the Survey Area; an overview of the field methodology; a summary of relevant contexts, themes, and property types; and complete lists of all recorded resources. This Survey Report is intended to be used in conjunction with the **SurveyLA Field Results Master Report** (Master Report), which provides a detailed discussion of SurveyLA methodology and explains the terms used in this report and associated appendices. The Master Report, Survey Report, and appendices are available online at www.surveyla.org.

SurveyLA Methodology Summary

Below is a brief summary of SurveyLA methodology. Refer to the Master Report discussed above for more information.

Field Survey Methods

- Properties surveyed for SurveyLA are evaluated for eligibility for listing in the National Register of Historic Places, California Register of Historical Resources, and for local designation as Los Angeles Historic-Cultural Monuments (HCM) or Historic Preservation Overlay Zones (HPOZ), commonly known as historic districts.
- Field surveyors cover the entire area within the boundaries of a CPA. However, only resources that have been identified as significant within the contexts developed for SurveyLA are recorded.
- Consultants making resource evaluations meet the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History, History, or a related field.
- Surveys focus on identifying significant resources dating from about 1850 to 1980.
- All surveys are completed from the public right-of-way (from vehicles or on foot as needed).
- Digital photographs are taken of all evaluated resources.
- Field surveys do not include:

- Individual resources and historic districts (including HPOZs) that are already designated (listed in the National, California or local registers).
- Community Redevelopment Agency of Los Angeles (CRA/LA) surveys conducted concurrent with SurveyLA surveys.
- Potential HPOZ areas which have been surveyed within the last five years and are in the process of being designated.

SurveyLA Resource Types

SurveyLA identifies individual resources, non-parcel resources, historic districts and district contributors and non-contributors. Each of these is described below. Appendices A, B, and C of this Survey Report are organized by resource type.

- **Individual Resources** are generally resources located within a single assessor parcel, such as a residence or duplex. However, a parcel may include more than one individual resource, if each appears to be significant.
- **Non-Parcel Resources** are not associated with Assessor Parcel Numbers (APNs) and generally do not have addresses. Examples may include street trees, street lights, landscaped medians, bridges, and signs.
- **Historic Districts** are areas that are related geographically and by theme. Historic districts may include single or multiple parcels depending on the resource. Examples of resources that may be recorded as historic districts include residential neighborhoods, garden apartments, commercial areas, large estates, school and hospital campuses, and industrial complexes.
- **District Contributors and Non-Contributors** are buildings, structures, objects, sites and other features located within historic districts (such as residences, schools, and parks). Generally, non-contributing resources are those that are extensively altered, are built outside the period of significance, or do not relate to historic contexts and themes defined for the district.
- **Planning Districts** are areas that are related geographically and by theme, but do not meet eligibility standards for designation. This is generally because the majority of the contributing features have been altered, resulting in a cumulative impact on the overall integrity of the area and making it ineligible as a Historic District. The Planning District determination, therefore, is used as a tool to inform new Community Plans being developed by the Department of City Planning. These areas have consistent planning concepts, such as height, massing, setbacks, and street trees, which may be considered in the local planning process.

Project Team

The Central City CPA survey team included the following personnel from ARG: Katie E. Horak, Principal, Architectural Historian and Preservation Planner; Andrew Goodrich, Associate, Architectural Historian and Preservation Planner; and Mickie Torres-Gil, Architectural Historian and Preservation Planner. Additional assistance was provided by intern Christina Park. Katie Horak served as project manager.

Survey Area

Description of the Survey Area

The boundaries of the Survey Area correspond with those of the Central City CPA, which is located in the eastern section of the city. The CPA encompasses all of Downtown Los Angeles and adjacent areas to the east that are zoned for industrial use. The Survey Area is relatively compact and is the second smallest Los Angeles CPA in terms of land area, though it is also the most densely developed. The area is trapezoidal in shape. Its boundaries are defined by Cesar E. Chavez Avenue on the north, Interstate 10/Santa Monica Freeway (10 Freeway) on the south, Alameda Street on the east, and State Route 110/Harbor Freeway (110 Freeway) on the west. The Survey Area abuts the CPAs of Central City North on the north and east, South Los Angeles and Southeast Los Angeles on the south, and Westlake on the west.

The Central City CPA is characterized by an extraordinarily diverse built environment and is somewhat informally divided into several smaller neighborhoods, each of which has a unique identity and physical character.¹ While the specific names and boundaries of neighborhoods are subject to interpretation and can vary widely across sources, the Central City Community Plan (2003) identifies nine neighborhoods within the CPA: Bunker Hill, Central City East, Civic Center, Convention Center, Fashion District, Financial District, Historic Core, Little Tokyo, and South Park. Two other neighborhoods, El Pueblo and the Warehouse District, are not explicitly listed in the Community Plan but have a unique identity and are also regarded as distinctive places within the CPA.² A brief description of each neighborhood is included below:

- **Bunker Hill** is located in the northwest section of the CPA. The community was originally one of the oldest neighborhoods in Los Angeles, but after World War II it was the site of a major redevelopment project undertaken by the Community Redevelopment Agency

¹ Neighborhood definitions and boundaries are somewhat subjective, varying according to source; this report uses the most widely accepted definitions with an eye toward capturing the general development patterns of the Central City CPA, not parsing the exact divisions between neighborhoods as perceived today.

² Additional information regarding neighborhood boundaries was gleaned from “Your Downtown LA Vision Plan,” a vision plan for Downtown produced by the Downtown Los Angeles Neighborhood Council and the Southern California Association of Governments (SCAG).

of Los Angeles (CRA). Today it is a mixed-use neighborhood composed of office towers, hotels, multi-family residential complexes, and cultural attractions. Almost all of the buildings in Bunker Hill are high-rise structures that are sited on large parcels and open into public plazas. Several of the buildings in Bunker Hill are among the tallest in Los Angeles and help to define the city's skyline.

- **Central City East** is generally located to the east of the Historic Core and to the south of Little Tokyo. Spanning a diverse area that encompasses Skid Row, the Toy District, and adjacent industrial zones, the neighborhood contains a mix of industrial and institutional uses. Notably, it contains many Single-Room Occupancy (SRO) hotels, social service facilities, and warehousing sites that are associated with food processing. Development in this area is of a notably lower scale than in other parts of the CPA.
- The **Civic Center**, which flanks the north edge of the CPA, is the locus of government activity in Los Angeles. This neighborhood contains the second highest concentration of civic buildings in the nation and includes facilities associated with federal, state, and municipal branches of government. While a few of these buildings date to the 1920s and 1930s, most were erected after World War II. Many are oriented around an axial, landscaped promenade that is known today as Grand Park. At the west edge of the Civic Center is an iconic cluster of performance venues known as the Music Center.
- The **Convention Center** district comprises the southwest corner of the CPA and is the site of several of Los Angeles' foremost sports and entertainment venues. The neighborhood is anchored by the Los Angeles Convention Center, the Staples Center, and L.A. Live. It also includes several hotels, commercial buildings, parking facilities, and other uses that complement the area's entertainment-oriented identity.
- The **El Pueblo** district, which is located to the north of the Civic Center and the 101 Freeway, comprises what was the heart of Los Angeles in the Spanish Colonial and Mexican eras of California history. The district is oriented around a central plaza and is developed with commercial and institutional buildings, some of which date to the nineteenth century and are among the oldest extant buildings in the city. The district is home to Olvera Street, a tourist destination that celebrates Los Angeles' Mexican-era heritage. The pueblo was listed in the National Register in 1976 as the Los Angeles Plaza Historic District. The historic district was also known as El Pueblo de Los Ángeles State Historic Park, and recently was renamed El Pueblo de Los Ángeles Historical Monument.
- The **Fashion District** is located to the south and east of the Historic Core.³ This area is largely composed of commercial and industrial properties that are used for the production and sale of garments and textiles, and is also an epicenter of the wholesale

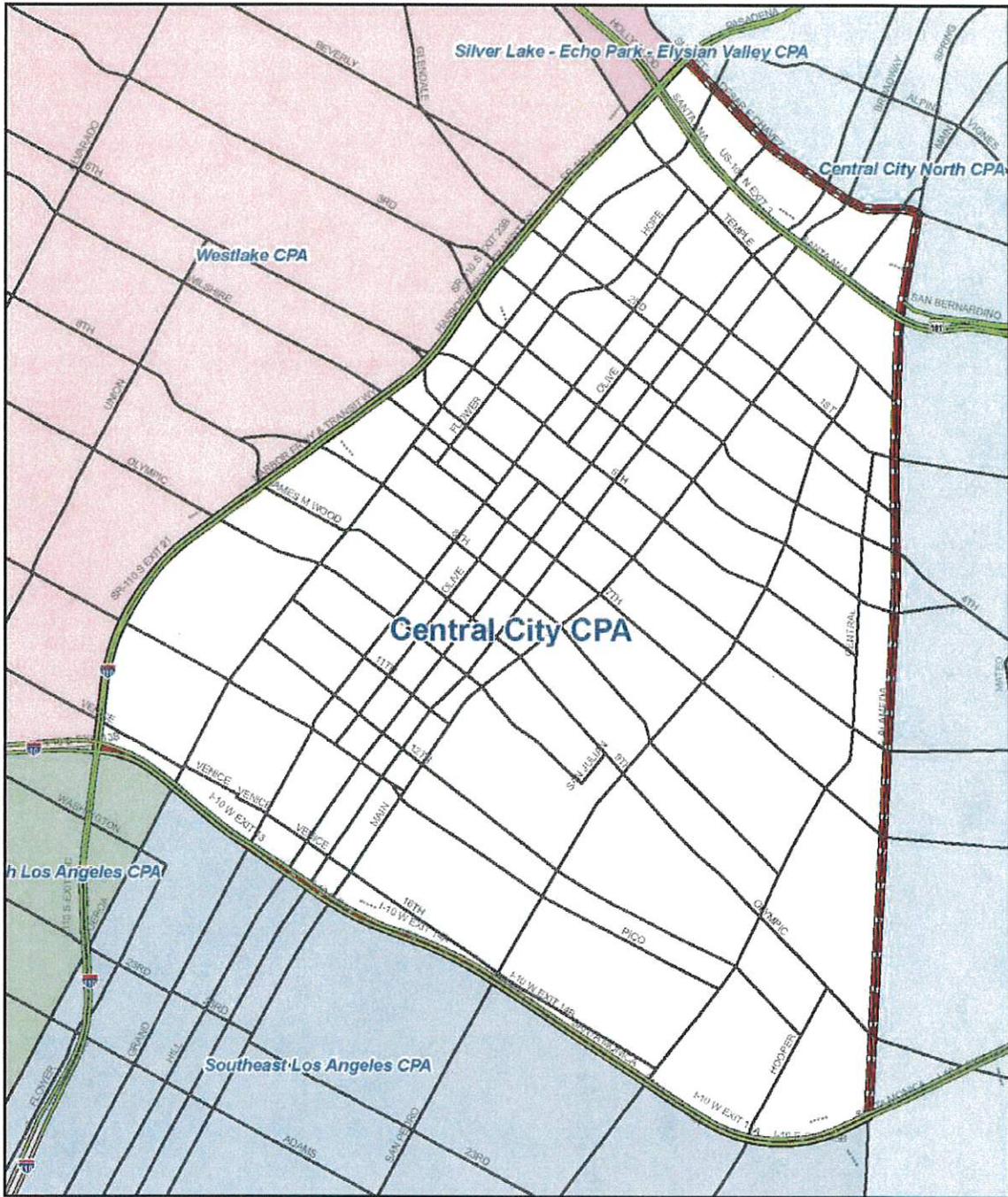
³ The 2003 Central City Community Plan refers to this area as "South Markets," but since the document's publication the area has become known as the Fashion District. This community plan is currently being updated.

flower and produce trades. It contains an eclectic mix of low-scale commercial buildings and multi-story industrial lofts. This area was historically known as the Garment District, but was re-branded as the Fashion District in the 1970s as its focus shifted from garment production to garment sales.

- Abutting the west edge of the CPA is the **Financial District**, which is located to the south of Bunker Hill and to the west of the Historic Core. Its landscape is dominated by contemporary office towers that are occupied by banks, financial institutions, law firms, and corporate interests. Many of Los Angeles' tallest buildings are concentrated in the Financial District or nearby in Bunker Hill. While the Financial District consists largely of buildings that were constructed after World War II, the area also includes several earlier commercial buildings, especially near its eastern edge and along Seventh Street.
- The **Historic Core** is located near the center of the CPA and historically developed as the central business district of Los Angeles. This area includes a concentration of former banks, department stores, theaters, and other commercial uses that date largely to the 1910s and 1920s. Reflective of the era in which they were constructed, many of these buildings are designed in the ornate and embellished Beaux Arts style. The area languished after World War II as businesses relocated and buildings sat almost entirely unoccupied, but it has recently experienced a renaissance as many vacant buildings have been repurposed into residential lofts. The area also includes what is known as the Jewelry District, a hub of the wholesale jewelry trade, and is the site of two National Register historic districts: the Broadway Theater and Commercial District and the Spring Street Financial District, both of which were listed in the National Register in 1979.
- **Little Tokyo** is a mixed-use neighborhood that is located to the south and east of the Civic Center. Since the late nineteenth century, it has been the center of Japanese American cultural identity in Los Angeles and is home to many locally-significant businesses and institutions. While the area retains some vestiges of its late nineteenth and early twentieth century roots, many of its buildings date to the 1970s, when a redevelopment project was initiated in the area. Contemporary development consists of mixed-use commercial and residential projects. Within this neighborhood is the Little Tokyo Historic District, a National Historic Landmark (NHL) that spans the north side of First Street between San Pedro Street and Central Avenue. The Little Tokyo Historic District was listed in the National Register in 1986, and was declared an NHL in 1995.
- **South Park** is generally located at the southwest corner of the CPA, adjacent to the Convention Center district. It is a mixed-use neighborhood with a blend of commercial, residential, institutional, and industrial buildings, some of which date to the early twentieth century. Since the early 2000s, a considerable amount of infill development has occurred and consists largely of mid- and high-rise apartments, condominiums, and

hotels. Interspersed between these contemporary buildings is a handful of apartments, commercial blocks, and light industrial buildings from the early twentieth century.

- The **Warehouse District** occupies the southeast corner of the CPA and is located to the east of the Fashion District. It is primarily composed of warehouses and other utilitarian industrial uses. The area also includes a very small number of single-family dwellings and Single-Room Occupancy (SRO) hotels that are associated with early residential development patterns that once characterized the neighborhood. Like Central City East, which is located to the north, development in the Warehouse District is of a notably lower scale than in many other parts of Downtown.



Central City Survey Area



The Survey Area contains 9,775 parcels, 8,033 of which were evaluated by the SurveyLA team. In accordance with SurveyLA methodology, properties constructed after 1980 and resources designated under local, state, and/or federal programs were not surveyed.

The Central City CPA is generally flat but is occasionally punctuated by modest hills and changes in elevation, particularly in and around the Bunker Hill neighborhood and to the north of the Hollywood Freeway/US-101 (101 Freeway). Both of these areas were historically characterized by varied topography but were almost entirely leveled in the mid-twentieth century to accommodate the westward expansion of Downtown's commercial and institutional core.

As one of the most urbanized areas of Los Angeles, the CPA has no natural features of note, though the channelized Los Angeles River is located directly to the east (outside of the CPA boundary). Rather, human-made features largely define the CPA. The area is encompassed by freeways and their associated overpasses, underpasses, and ramps. The freeways and their infrastructure include sections that are both above and below grade. Whereas the 10 and 110 Freeways are coterminous with the boundaries of the CPA, the 101 Freeway bisects it by way of a below-grade segment that is known as the "Downtown Slot" and physically separates the Civic Center from the historic El Pueblo district. Also within the CPA are two tunnels that carry vehicular traffic beneath Bunker Hill, one on Second Street and the other on Third Street, and a funicular railway (Angels Flight) that dates to 1901 and links Bunker Hill to the Historic Core. An elevated pedway network, which consists of above-grade pedestrian corridors, bridges, and stairwells, directly links several key buildings and sites in Bunker Hill. Two transit corridors that are used by the Metropolitan Transportation Authority (MTA, or Metro) and serve Downtown are located within the CPA: the Red/Purple Line subway right-of-way, which operates entirely below ground, and the Blue/Expo Line light rail right-of-way, which includes sections that run both above and below ground. A third subway corridor known as the Regional Connector is currently under construction. Entrance portals and other infrastructure associated with Metro's subway and light rail systems can be found at various points throughout the CPA.

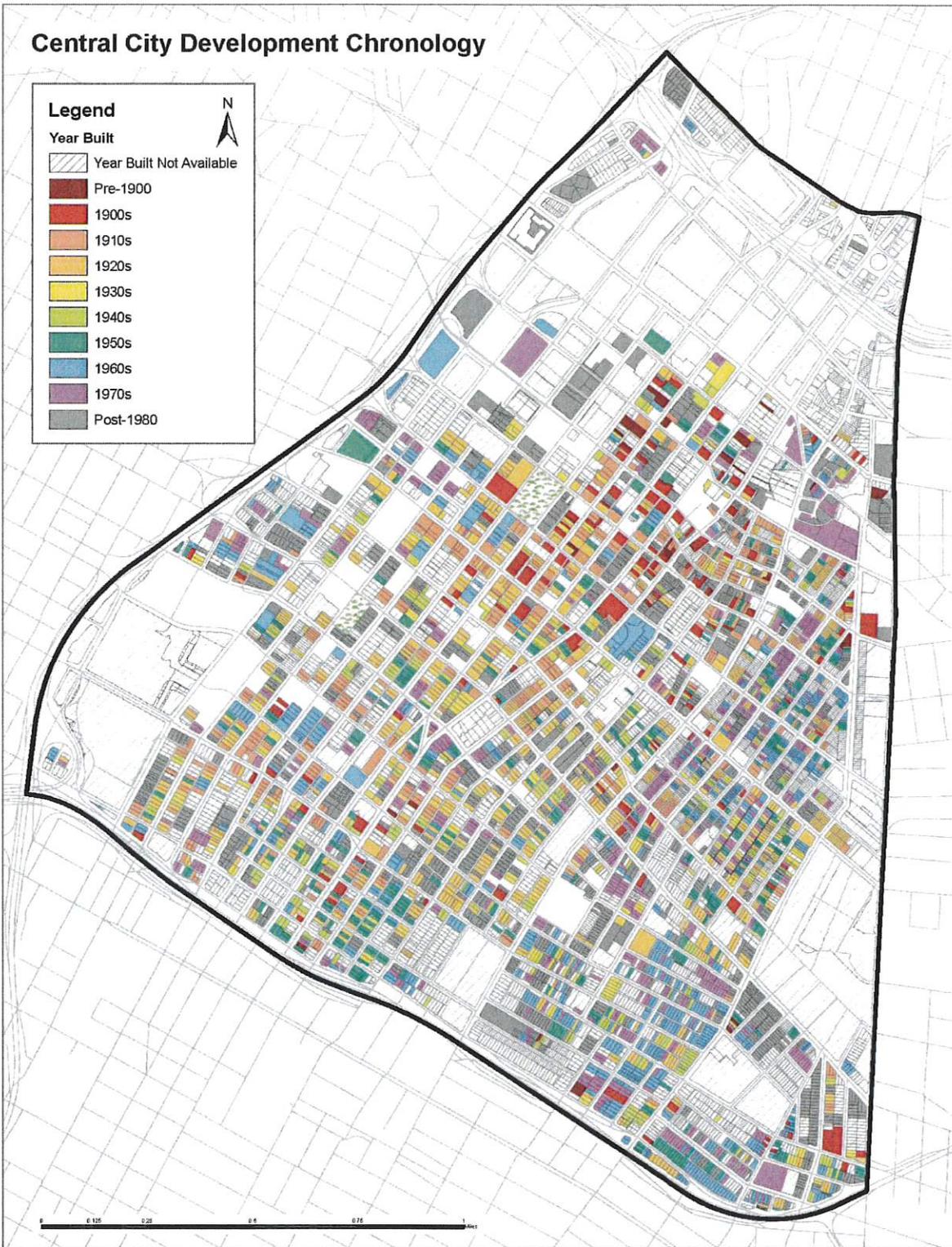
Various land uses and associated property types are represented within the CPA. Very generally speaking, the western portion of the CPA is developed primarily with commercial properties that vary widely with regard to scale, height, age, and architectural style. Earlier examples of commercial properties, most of which are mid-rise structures and were constructed to the city's one-time height limit of 150 feet, are concentrated in the Historic Core and can also be found in some adjacent neighborhoods. Corporate office towers and other high-rise commercial buildings are located in the vicinity of Bunker Hill and the Financial District, and entertainment-related commercial uses are largely located in the Convention Center district. Lower-scale commercial development can be found in Little Tokyo and throughout the Fashion District. The eastern portion of the CPA, in contrast, is composed almost entirely of various industrial uses.

Though it is primarily a locus of commercial and institutional activity, the CPA includes some residential development as well. Following the adoption of the City's Adaptive Reuse Ordinance

in 1999, many of the early commercial buildings in the Historic Core have been repurposed into residences. Some of these converted properties are occupied exclusively by multi-family dwelling units, but others contain a mix of uses, with commercial tenants below and residential units above. Examples of multi-family residential development are also found in the South Park neighborhood and at the periphery of the CPA. Institutional uses are located at various points, though there is a concentration of civic buildings and institutional properties in and around the Civic Center. The CPA includes four public parks: Grand Park (12 acres), Pershing Square (five acres), Grand Hope Park (two and a half acres), and Spring Street Park (0.7 acres), as well as many public plazas and pedestrian promenades that facilitate circulation between key buildings and sites. Relative to other areas in Los Angeles that are more residential, Central City has a limited amount of open space.

Circulation within the CPA generally adheres to a grid pattern that is oriented at a 36-degree angle off the cardinal directions. The street grid divides the area into a series of blocks that are largely uniform in size and pedestrian in scale. Its skewed orientation, which is shared by most other neighborhoods adjacent to Downtown, can be traced back to the Laws of the Indies, which were used by the Spanish founders of Los Angeles to dictate the orientation and development of the pueblo and its environs. Many of the streets in the western half of the CPA are one-way and are arranged as couplets. Streets in the eastern, industrial section of the CPA continue to adhere to the grid, but feature longer blocks and adhere to a less regular pattern. Reflective of the area's varied topography, many of the streets in Bunker Hill feature multiple levels and separations of grade. Streets within the Toy District are defined by their meandering courses and narrow widths, which distinguishes them from the rest of Downtown's streets.

The major east-west arteries within the Survey Area are (from north to south): Cesar E. Chavez Avenue, Temple Street, First Street, Second Street, Third Street, Fourth Street, Fifth Street, Sixth Street, Seventh Street, Eighth Street, Ninth Street, Olympic Boulevard, Pico Boulevard, and Venice Boulevard. The major north-south arteries within the Survey Area are (from east to west): Alameda Street, Central Avenue, San Pedro Street, Maple Avenue, Los Angeles Street, Main Street, Spring Street, Broadway, Hill Street, Olive Street, Grand Avenue, Hope Street, Flower Street, and Figueroa Street.



Chronology map of the Central City CPA (ARG, 2016)

Development History

Early History and the Los Angeles Pueblo

Like most of Southern California, what would eventually become Downtown Los Angeles was undeveloped and consisted of vast expanses of barren flatlands prior to the arrival of Spanish explorers and missionaries in the eighteenth century. The area was inhabited by the Tongva people in the pre-contact period. Of the hundred or so Tongva villages that are believed to have peppered the Southern California landscape at this time, the largest, which featured a population of approximately 100, was located on the western bank of the Los Angeles River and was known as Yang-na. The exact location of Yang-na has proven difficult for historians to pinpoint – and evidence suggests that the village likely moved several times due to shifts in the course of the Los Angeles River during wet seasons – but it is believed to have been located in the general vicinity of what is now the El Pueblo district and Los Angeles Union Station.⁴

In 1769, the area was “discovered” by Spanish explorers associated with the Portola Expedition, an overland excursion between San Diego and Monterey that led to the Spanish colonization of California. While journeying north, explorer Gaspar de Portolá, joined by two Franciscan monks and an entourage of soldiers and mules, arrived in what is now Elysian Park and set up an overnight camp. Father Juan Crespí, who recorded details about the expedition in his diary, marveled at the beauty of the Los Angeles River and noted that the area around Yang-na had “good land for planting all kinds of grain and seeds, and is the most suitable site of all that we have seen for a mission, for it has all the requisites for a large settlement.”⁵ Father Crespí named the river in honor of Nuestra Señora La Reina de Los Ángeles de Porciúncula, a feast that had taken place the preceding day to celebrate the birth of Catholicism’s Franciscan order.⁶

However, Father Crespí’s recommendation pertaining to the riverfront site was disregarded. Instead, it was decided to erect a new mission some ten miles to the east, which was founded in 1771 and was named San Gabriel Arcángel.⁷ Consistent with the Spanish system of mutually reinforcing land uses, sites also had to be selected for new secular settlements, or pueblos, that would support the missions and would also help to reaffirm Spain’s claim to Alta California. The site near Yang-na that Father Crespí had previously identified was selected by Governor Felipe de Neve as a potential location at which to develop a pueblo. This area encompassed four square leagues that included all of what is now Downtown Los Angeles and extended outward to present-day Indiana and Hoover streets, Exposition Boulevard, and an axis that followed the course of Fountain Avenue.⁸

⁴ “Site Context for the LA Plaza de Cultura y Artes Project, Los Angeles, California,” prepared for the County of Los Angeles by SWCA Environmental Consultants, Dec. 2012, 11.

⁵ H. Eugene Bolton, *Fray Juan Crespí: Missionary Explorer on the Pacific Coast, 1769-1774* (Berkeley: University of California Press, 1927), 146-147.

⁶ *California Place Names: A Geographical Dictionary* (Berkeley: University of California Press, 1949), 183.

⁷ Maynard Geiger, “The Building of Mission San Gabriel: 1771-1828,” *Southern California Quarterly* 50.1 (March 1968): 33-42.

⁸ City of Los Angeles, *Four Square Leagues: Los Angeles Two Hundred Years Later*, undated publication, 17.

Once De Neve's proposal was approved by the Spanish Crown in 1779, the governor enlisted a group of volunteers who were tasked with venturing north to California and formally settling the new town. Known as the pobladores, these volunteers were recruited from the Sinaloa and Sonora regions of New Spain.⁹ Though they collectively relocated from northern Mexico and held Spanish surnames, the pobladores were an extraordinarily diverse group who belonged to eleven families of various ethnic backgrounds: among the 44 recruits who completed the journey, "only two were white...of the other 42, 26 had some degree of African ancestry and 16 were Indians or mestizos, people of mixed Spanish and Indian blood."¹⁰ The pobladores and several soldiers who served as escorts set out for California in early 1781.

While awaiting the arrival of these founding families, plans were laid out for the development of the new pueblo. These plans adhered to the Laws of the Indies, a set of ordinances that shaped nearly every facet of life in Colonial Spain and included specific provisions related to the physical form of new towns. Reflective of these laws, the pueblo would be oriented around a rectangular plaza that would act as its geographical center. Extending outward in each direction from the plaza would be agricultural plots on which families would erect a house and farm the land.¹¹ A church and public buildings would flank the plaza. The laws called for pueblos to be oriented at 45 degrees from true north "to provide, it was said, equal light to every side of a small house throughout the day"; however, due to the shifting course of the Los Angeles River and the area's hilly topography, only a 36-degree angle could be attained.¹² This geographical challenge accounts for the skewed orientation of Downtown Los Angeles' street pattern today.

El Pueblo de Nuestra Señora La Reina de Los Ángeles de Porciúncula was officially founded on September 4, 1781, when the eleven families arrived at the site by way of the San Gabriel Mission. Shortly after arriving, three of the families were deemed as "not useful" and, at their own request, were relieved of their duties. Those that remained improved the land by erecting small, wattle-and-daub shelters; planting their respective plots with wheat, beans, and corn; and constructing an irrigation canal that transported water between the river and pueblo and was named the Zanja Madre, or "Mother Ditch."¹³ The pobladores lived alongside the Tongva, who were moved to small rancherías on the edges of the pueblo and were often recruited for labor and menial jobs around the town.¹⁴ Within a decade, the pueblo was composed of 29 adobe dwellings, a chapel, a guard house, several administration buildings, and granaries serving 139 people; by 1818, the population had grown to nearly 600.¹⁵ The town was an agricultural success, producing large quantities of hemp and hundreds of acres of vineyards.

⁹ City of Los Angeles, "Los Pobladores," accessed May 2016.

¹⁰ Myrna Oliver, "William Mason: California Historian, Author," *Los Angeles Times*, Nov. 25, 2000.

¹¹ Jean Bruce Poole and Tevvy Ball, *El Pueblo: The Historic Heart of Los Angeles* (Los Angeles: Getty Conservation Institute, 2002), 9; Corey and Sarah Stargel, *Early Downtown Los Angeles* (Charleston: Arcadia Publishing, 2009), 9.

¹² D.J. Waldie, "L.A.'s Crooked Heart," *Los Angeles Times*, Oct. 24, 2010.

¹³ William M. Mason, *Los Angeles Under the Spanish Flag* (Burbank: Southern California Genealogical Society, Inc., 2004), 13.

¹⁴ Poole and Ball (2002), 11.

¹⁵ Poole and Ball (2002), 12.

The precise location of the original pueblo is the subject of debate, but what is known is that the town site was most likely located south of the current Los Angeles Plaza and occupied a lower-lying area that was prone to flooding. In 1815, torrential rains altered the course of the Los Angeles River and caused a flood so severe that it washed away almost the entire pueblo site.¹⁶ Out of necessity, the townspeople moved the pueblo to higher ground, near where the Los Angeles Plaza is located today. Shortly after relocating the pueblo, a site was selected for a new plaza church (City HCM #3, in the Los Angeles Plaza Historic District), which was built beginning in 1818 and was dedicated in 1822. New public buildings and dwellings were erected nearby including the Avila Adobe (California Historical Landmark #145, in the Los Angeles Plaza Historic District), which was built in 1818 and is the oldest extant residence in Los Angeles.

Like the rest of California, the small pueblo transitioned to Mexican rule in 1821 after Mexico won independence from Spain. The transition from Spanish to Mexican rule was marked by many social and economic changes including secularization of the missions, the easing of trade restrictions, and the division of California into expansive land grants, or ranchos, which were used for cattle ranching and agriculture.¹⁷ These changes bolstered California's lucrative hide-and-tallow trade and ushered in a wave of prosperity for the Los Angeles pueblo. Enveloped by cattle ranches and vineyards, the small settlement became an economic hub among Southern California's "cow counties" and slowly, but surely experienced an uptick in its population. Development was concentrated around the plaza, which by the 1830s consisted of institutions such as the plaza church; the dwellings of wealthy cattle ranchers; and a variety of businesses including retail stores, taverns, blacksmith shops, and tanneries. The area outside of the plaza retained an agricultural flavor and consisted almost entirely of ranches and farms. Underscoring its rise in stature under Mexican rule, the pueblo was officially conferred the status of "ciudad," or city, in 1835. By the mid-1840s, the population of Los Angeles had grown to 1,250.¹⁸

During the Spanish and Mexican eras of California history, Los Angeles "remained a frontier settlement with crooked, irregular streets, house lots of various shapes and sizes, and houses constructed at different angles to the streets and plaza."¹⁹ Most of the buildings within the pueblo were modest, single-story adobe structures with flat, earthen roofs and dirt floors.²⁰ The character and architecture of Los Angeles remained relatively unchanged until the latter half of the nineteenth century, after California had become a part of the United States.

Development in the Early American Period

In 1846, war broke out between Mexico and the United States when the latter set out to expand its territory west to the Pacific Ocean. On a promontory to the west of the pueblo, a

¹⁶ Leon Furgatch, "L.A. River – a Force to Reckon With," *Los Angeles Times*, May 18, 1997.

¹⁷ Carey McWilliams, *Southern California: An Island on the Land* (Salt Lake City: Peregrine Smith, 1946), 38-39.

¹⁸ Hubert Howe Bancroft, et al., *History of California: 1841-1845* (San Francisco: The History Company, 1886), 628.

¹⁹ "Technical Report: Historical/Architectural Resources," prepared for the Los Angeles Rail Rapid Transit Project Environmental Impact Report (Jan. 1983), 9.

²⁰ *Ibid.*

battalion of Mormon soldiers affiliated with the United States Army built Fort Moore, a military fortification that remained in operation between 1847 and 1853.²¹ The war concluded with the signing of the 1848 Treaty of Guadalupe Hidalgo, in which many Mexican territories, including California, was ceded to the United States. A steady influx of white Americans began to settle in Los Angeles in the early years of statehood, especially miners who failed to strike it rich in the gold fields of Northern California, but overall it “remained a predominantly Mexican city for the next three decades in terms of population and the use of Spanish as a common language.”²²

Many of the essential characteristics that would come to characterize Downtown Los Angeles – such as its street names, circulation patterns, and long rectilinear blocks – were set into place by the City’s first official survey, which was led by Lieutenant Edward O.C. Ord in 1849. The survey was commissioned so that the City could sell portions of its pueblo lands, which were not clearly delineated at the time due to inconsistencies between Mexican and American title law.²³ The sale of pueblo lands was also hindered because of a rule stipulating “that municipal lands could only be sold with reference to a city map.”²⁴ Starting at the plaza church, which was at the center of the city, Ord surveyed the hundred or so adobe buildings within the plaza and continued in each direction until the entire area around the plaza was covered. Ord’s findings were depicted in a map that set the stage for future development by delineating a network of streets and blocks to the southwest of the existing plaza. Much of Downtown Los Angeles would later be developed on Ord’s orthogonal grid. Likewise, several street names codified by the Ord survey – such as Principal (Main), Primavera (Spring), Loma (Hill), Flores (Flower), and Esperanza (Hope) – are still in use today, though they have been Anglicized.²⁵

Los Angeles nonetheless remained a remote outpost and was regarded as “one of the most isolated communities in the nation” in the early years of statehood.²⁶ As more Americans ventured west and settled in Los Angeles, the city slowly began to shift to the south of its historical nucleus around the plaza. Most new development was clustered on Main and Los Angeles streets and consisted of small, modest buildings that were constructed alongside existing adobe structures.²⁷ One of the most notable examples of this early southward shift of the city was the Bella Union Hotel (not extant) at what is now the northeast corner of Main and Temple streets. Notable as the city’s first full-fledged hostelry, the Bella Union opened in 1849 in an existing building that had previously been a general store. In addition to very modest accommodations and an on-site saloon, which was known for its hardscrabble clientele and the

²¹ The California Military Museum, “The Two Forts of Fort Hill,” accessed May 2016.

²² City of Los Angeles, “El Pueblo de Los Angeles Historical Monument,” accessed May 2016.

²³ W.W. Robinson, et al., “Story of Ord’s Survey: As Disclosed by the Los Angeles Archives,” *The Quarterly: Historical Society of Southern California* 19.3 (Sept.-Dec. 1937): 121-131.

²⁴ William David Estrada, *The Los Angeles Plaza: Sacred and Contested Space* (Austin: University of Texas Press, 2008), 54.

²⁵ Glen Creason, “CityDig: Los Angeles Was Once a Small Adobe Backwater,” *Los Angeles Magazine*, Jul. 20, 2015.

²⁶ John Mack Faragher, *Eternity Street: Violence and Justice in Frontier Los Angeles* (New York: W.W. Norton and Company, 2016).

²⁷ Water and Power Associates, “Early Los Angeles Historical Buildings (1800s),” accessed May 2016.

occasional gun battle, the hotel served as an important center of social and political life in early Los Angeles. In the 1850s, several notable local institutions occupied the building including Los Angeles County's first courthouse; the headquarters of the city's first newspaper, the *Los Angeles Star*; and the offices of the Butterfield Overland Mail Company.²⁸

Several small business blocks were subsequently constructed near the Bella Union. A cohort of enterprising developers erected new business blocks in the vicinity including the Temple Block at Main and Temple streets (1857, not extant); the Downey Block, also at Main and Temple streets (1869, not extant); and the Baker Block at Main and Arcadia streets (1878, not extant). Closer to the plaza, the three-story Pico House (California Historical Landmark #159, in the Los Angeles Plaza Historic District) was erected by ex-Mexican Governor of California Pio Pico between 1869 and 1870 and was billed as the city's finest hotel, superseding the Bella Union.²⁹ Modest houses that reflected the humble means of their inhabitants occupied the blocks in the immediate vicinity of the plaza and the Main Street commercial corridor. Areas lying to the east of the city continued to be dominated by agriculture and ranching operations. In contrast to the adobe structures that had characterized the built environment of Los Angeles in the Spanish and Mexican periods, new construction in the early years of statehood consisted of wood and brick structures, as those who arrived in Los Angeles from the Eastern United States brought their preferred architectural styles and method of construction with them.³⁰

In his survey, Lieutenant Ord had optimistically extended the city grid as far south as 12th Street and as far west as Figueroa Street. In reality, much of this area was very slow to develop, and blocks at the farther reaches of Ord's grid generally remained untouched and "still looked and functioned like open pasture" well into the 1860s and 1870s.³¹ However, development began to eke its way to the south and west of what was then the city's population center. One of the first developments to take place on the urban fringe was initiated in 1866, when City officials set aside an undesirable block bounded by Fifth, Sixth, Hill, and Olive streets as a public park and named it La Plaza Abaja, or "the Lower Plaza." The park remained a swath of barren land until a group of affluent landowners planted it with cypress and citrus trees in the 1870s.³² After a succession of name changes and redesigns, the park was eventually named for World War I General John Pershing and is now known as Pershing Square. A second notable development project in the area occurred in 1867 when a campus was developed for St. Vincent's College (not extant). Consisting of a stately two-story building surrounded by athletic fields, the campus encompassed the block bounded by Sixth, Seventh, Broadway, and Hill

²⁸ Maymie R. Krythe, "First Hotel of Old Los Angeles: 'The Romantic Bella Union,'" *The Historical Society of Southern California Quarterly* 33.2 (June 1951): 147-179.

²⁹ Water and Power Associates, "Early Los Angeles Historical Buildings (1800s)," accessed May 2016.

³⁰ "Technical Report: Historical/Architectural Resources," prepared for the Los Angeles Rail Rapid Transit Project Environmental Impact Report (Jan. 1983), 9.

³¹ Nathan Masters, "From Plaza Abaja to Pershing Square," *KCET*, May 9, 2012.

³² Los Angeles Conservancy, "Pershing Square," accessed May 2016.

streets and exerted a commanding physical presence at what was then the southern periphery of the city.³³

Late Nineteenth Century Development

By 1870, Los Angeles' population had increased to 5,728, its largest number to date, yet the city exuded a small-town feel and paled in comparison to other cities such as San Francisco, whose population at this time was approaching 150,000. However, in the final quarter of the nineteenth century Los Angeles experienced a period of unprecedented growth, and for the first time began to take on a more urban character. This growth was catalyzed, in large part, by the construction of new railroad lines to Los Angeles, which forged a direct connection between Southern California and other regions and effectively put the city on the nation's radar for the first time. Los Angeles' first railroad was built between 1868 and 1869 and connected the Central City area with port facilities at San Pedro, some twenty miles to the south. Financed by entrepreneurs John Downey and Phineas Banning, the Los Angeles and San Pedro Railroad "reduced the cost of transporting goods and passengers to and from the ships" at the port.³⁴ A second major development came in 1876, when the Southern Pacific Railroad completed a railroad line from San Francisco to Los Angeles, providing Southern California with its first transcontinental rail connection. Several years later, in 1885, a second transcontinental line developed by the Atchison, Topeka and Santa Fe Company terminated in Los Angeles and provided an even more direct connection with major East Coast cities and economic markets.³⁵

The railroads' arrival ushered in a wave of rapid growth as investors, eager to capitalize on the area's economic potential, poured their resources into local real estate. The area that formed the nucleus of early Los Angeles experienced an onslaught of new development in the late nineteenth century and emerged as an eminent political, cultural, and economic center. Generally speaking, the city experienced a southward shift at this time as a significant amount of new development occurred to the south of the plaza. "A dense core of commercial and government buildings" agglomerated in the area now known as the Civic Center, with scores of new commercial blocks erected along Main Street between the plaza and roughly Second Street. An oddly-configured intersection where Main, Spring, and Temple streets converged, known as Temple Square, emerged as the commercial heart of the city, where "professionals of all stripes – lawyers, bankers, photographers, hatters – jockeyed for offices."³⁶ Hotels were swiftly constructed nearby to accommodate newcomers who arrived in Los Angeles by train. Institutional buildings also clustered around Temple Square. At Main and Second streets, a massive new cathedral (City HCM # 17) was built, which was named for martyr Saint Vibiana and was a dominant element of the city when it opened in 1876. Civic buildings were erected nearby including a new City Hall on Broadway between Second and Third streets (1888, not extant), and what was known as the "Red Sandstone Courthouse" (1891, not extant).³⁷

³³ Stargel and Stargel (2009), 28.

³⁴ Nathan Masters, "L.A.'s First Railroad Connected the Region to the Global Economy," *KCET*, Mar. 14, 2012.

³⁵ McWilliams (1946), 117-118.

³⁶ Curtis C. Roseman, et al., *The Historic Core of Los Angeles* (Charleston: Arcadia Publishing, 2004), 7.

³⁷ Both of these buildings were subsequently demolished to accommodate the expansion of the Civic Center.

A considerable amount of residential development also occurred amid the railroad boom. By directly competing with the Southern Pacific, the Santa Fe transcontinental line touched off a “fare war” between the two companies that reduced travel costs to nearly nothing and brought droves of newcomers to Los Angeles. Many of these visitors elected to stay in Los Angeles after being introduced to its salubrious climate, which led to a substantial increase in the city’s population. To keep pace with this growth, areas around the Downtown commercial district were developed with new residences. Reflective of the diverse composition of the city’s population at the time, residential development consisted of a variety of housing types; single-family residences, apartment houses, and residential flats tended to occupy blocks farther removed from the commercial core, whereas denser rooming houses and residential hotels were more deliberately integrated into the urban fabric. Several Single-Room Occupancy (SRO) hotels arose along the corridors between Main Street and the rail depots around Alameda Street. These modest hostelries provided low-cost accommodations to seasonal workers and train crews who were “laid over” between trips, most of whom were single men.³⁸

On the opposite end of town from the ill-reputed residential hotels was an upscale residential district known as Bunker Hill. Occupying a promontory to the west of the business district, the area had historically been seen as poorly-suited to development because of its topography and its general inaccessibility to the city. However, in 1867 developer Prudent Beaudry purchased the entire promontory and vowed to transform the scrubby, inaccessible area into a profitable real estate venture.³⁹ Over the next several years, Beaudry invested heavily in making the hill a feasible place to settle, which included the construction of a new system of water pipes and steam pumps and the platting of roads up and across the hill. By the 1880s, Bunker Hill had evolved into Los Angeles’ toniest residential district. Many of the city’s most affluent and esteemed households constructed large, Victorian-era mansions that were perched atop the hill and overlooked the city below. In part, Bunker Hill’s success was aided by advances in public transportation including a cable car line on Second Street that opened in 1885, and two funicular railways – Angels Flight (City HCM #4) and Court Flight (not extant) – that rendered it easier for passengers to travel up and down the steep eastern grade.

Characteristic of the era, many of the residential communities that developed in Central City in the late nineteenth century were restricted to middle- and upper-class whites. Ethnic and cultural minorities were typically relegated to small enclaves that tended to be located around the historic plaza and in other areas that were deemed less desirable. One of the earliest ethnic enclaves to develop in the area, a block-long stretch of Calle de los Negros (a small alley adjacent to the plaza), was occupied by Chinese American laborers. Known as Old Chinatown, it “was the center of community for Chinese in Los Angeles and included both living quarters and places of employment.”⁴⁰ By 1870, the area included approximately 200 Chinese American

³⁸ Los Angeles Area Chamber of Commerce, “History of Downtown Los Angeles’ ‘Skid Row,’” n.d.

³⁹ Nathan Masters, “Rediscovering Downtown L.A.’s Lost Neighborhood of Bunker Hill,” *KCET*, Jul. 11, 2012.

⁴⁰ “SurveyLA Draft Chinese American Historic Context Statement,” Sept. 2013, 5.

residents, most of whom were employed as launderers, truck farmers, and vegetable peddlers. Other ethnic enclaves also arose in the vicinity including an Italian settlement around what is now Olvera Street, and a Mexican American community called Sonoratown to the north and west of the historic plaza.⁴¹ A multi-ethnic Mexican and Italian community that was known as the Mateo/Cabrini district emerged in what is now the industrial district of Downtown, but was later decimated by the construction of the Santa Monica Freeway/Interstate 10.⁴²

To the east of the commercial core at Main and Temple streets, the seeds of a Japanese American enclave were sowed when a former Japanese sailor named Charles Kame opened a small café on East First Street in 1886.⁴³ Kame's café formed the cornerstone of a small Issei (first generation Japanese) community that developed near First and San Pedro streets. By the late 1890s, other Japanese-owned restaurants set up shop in the East First Street neighborhood and "served American meals to an ethnically mixed working class who worked in the district."⁴⁴ The area subsequently evolved into the heart of the Japanese American community in Los Angeles as many Nikkei (Japanese immigrants) moved into the neighborhood, attracted to its relative lack of discrimination and proximity to places of employment. The area was first referred to as "Little Tokyo" circa 1905 and emerged as a thriving cultural enclave. By the 1920s, the area had become home to a sizable Japanese American population and was also the site of myriad stores and institutions that catered to its largely-immigrant community.

Early Twentieth Century Growth: Rise of the Central Business District

By the turn of the twentieth century, Los Angeles had unequivocally shed its small town roots and had matured into "a populous, commercialized city with increasing regional importance."⁴⁵ Its population had nearly doubled between 1890 and 1900, from roughly 50,000 to more than 102,000.⁴⁶ As the city grew in population and stature, its business district was pulled to the south and west, eventually supplanting older commercial nodes and giving rise to a thriving central business district that is known today as the Historic Core. By 1900, several prominent commercial buildings had been constructed in the area including the Bradbury Building at Second Street and Broadway (1893, City HCM #6) and the Douglas Building at Third and Spring streets (1898, City HCM #966). As more and more development occurred, and the central business district began to firmly take shape, the term "Downtown" was used to describe the area and became a part of the local lexicon. The first official reference to "Downtown Los Angeles" appeared in the *Los Angeles Herald* in 1906, and in the *Los Angeles Times* in 1909.⁴⁷

Construction of the Continental Building at Spring and Fourth streets (City HCM #730) in 1904 was a particularly evocative symbol of the southward expansion of Downtown. While it was not

⁴¹ Charles Epting, *Victorian Los Angeles: From Pio Pico to Angels Flight* (Charleston: Arcadia Publishing, 2015), 32.

⁴² "SurveyLA Latino Historic Context Statement," Sept. 2015, 20.

⁴³ National Park Service, "Little Tokyo Historic District," accessed May 2016.

⁴⁴ "National Register of Historic Places Nomination Form: Little Tokyo Historic District," prepared 1976-1977.

⁴⁵ Historic American Building Survey Documentation for the Garnier Block, HABS No. CA-2799, n.d.

⁴⁶ "Historical Resident Population, City and County of Los Angeles," Los Angeles Almanac, accessed May 2016.

⁴⁷ Nathan Masters, "How Los Angeles Got a 'Downtown,'" *KCET*, Jan. 9, 2015.

the first modern structure to arise in the area, the 13-story, Beaux Arts style building was the tallest in Los Angeles upon its completion and is generally considered to be the city's first high-rise structure.⁴⁸ However, as buildings were becoming increasingly taller, City officials and other Downtown stakeholders expressed concern that Los Angeles would become "Manhattanized," which threatened its image as a retreat from the dense, congested, and walled-in streets of East Coast cities. Concerned parties made the case that "high buildings make for congestion, and the experience of New York and Chicago and other large cities has demonstrated the wisdom of avoiding everything that will tend to create congestion."⁴⁹ They instead advocated for a more horizontal pattern of development since, at the time, Los Angeles had what seemed to be unlimited space in which to expand. In response, the Los Angeles City Council enacted an ordinance in 1905 that restricted the height of new buildings to 150 feet, or roughly 13 stories.⁵⁰ The height ordinance thwarted the vertical growth of Downtown and created a nearly-uniform skyline that lasted until the restrictions were repealed in the mid-1950s.

As the central business district was pulled to the south, new commercial and institutional buildings were swiftly constructed until nearly every parcel in the Historic Core was developed. Between the turn of the twentieth century and the late 1920s, the central business district took shape and matured into a quintessential American downtown. Scores of new height-limit buildings were erected to house the entire gamut of commercial uses including banks and financial institutions, hotels, offices, department stores and smaller retail outlets, theaters and concert halls, and restaurants and taverns.⁵¹ Many of these buildings featured some combination of commercial uses, typically with retail on the ground story and offices up above. Reflecting the prevailing sense of prosperity, almost all were intended to be bold architectural statements that showcased an architect's mastery of the Beaux Arts tradition or other, similar architectural styles that exuded formality and were predicated on the Classical orders. Buildings constructed at the end of the 1920s and into the early 1930s often exhibited characteristics of styles that were considered to be more "modern," including Art Deco and Streamline Moderne.

Some of Downtown's major thoroughfares took on discernible identities during this period of unprecedented growth. A critical mass of banks and financial institutions arose along Spring Street, which spurred comparisons with its East Coast counterpart, Wall Street, and led to it becoming known as the "Wall Street of the West." By the 1920s, Spring Street included a "remarkably homogenous collection of financial structures" that collectively acted as the heart of economic activity in the city.⁵² Anchored by the construction of the Bullock's Department Store at Seventh and Broadway in 1906, Seventh Street matured into an upscale shopping district in the 1910s and 1920s, and was lined with stores operated by leading retailers.⁵³

⁴⁸ "Renovation Action Taken by CRA on Two Buildings," *Los Angeles Times*, Mar. 9, 1986.

⁴⁹ "The Height of Buildings," *Southwest Contractor and Manufacturer* 6.1 (Nov. 1, 1910): 17.

⁵⁰ Ray Hebert, "No Tall Buildings: Aesthetics, Not Quakes, Kept Lid On," *Los Angeles Times*, Jul. 8, 1985.

⁵¹ Roseman, et al. (2004), 7.

⁵² National Register of Historic Places Nomination Form, "Spring Street Financial District," prepared Jul. 1977.

⁵³ Los Angeles Conservancy, "Strolling on 7th Street: Downtown's Historic Thoroughfare," Nov. 7, 2010.

Broadway emerged as a robust commercial and entertainment district and was anchored by several major department stores, variety stores, and theaters, twelve of which are still standing. More than a dozen grand movie palaces arose along the Broadway corridor between the 1910s and 1930s, each of which vied to be more opulent than its predecessors. The embellished architecture of these theaters culminated in Broadway's particularly "diverse and colorful streetscape."⁵⁴ One of the last theaters to be built on Broadway, the Los Angeles Theatre (City HCM #225, in the Broadway Theater and Commercial District), opened in 1931 at a cost of one million dollars and was considered to be the most lavish of Broadway's movie palaces. In addition to its extravagant French Baroque design, the venue also featured unusual amenities including an electric monitor to indicate available seats, soundproof "crying rooms" for parents with young children, a staffed playroom, and "a glamorous ladies lounge featuring sixteen private compartments, each finished in a different marble."⁵⁵

Amid Los Angeles' rapid growth, local leaders deemed it a priority to modernize and expand municipal services and initiated plans to develop a new civic center complex at the north end of the central business district. At the time, civic functions were scattered across the Downtown area and lacked the cohesion and monumentality that its leaders believed were befitting of a city the size of Los Angeles. After competing visions led to multiple failed attempts and years of political wrangling, the City Council adopted a Civic Center Master Plan in 1927 that incorporated elements of previous plans that had been developed for the area by city planner Charles Mulford Robinson, the architectural firm of Cook and Hall, and a consortium of local practitioners known as the Allied Architects Association.⁵⁶ Bounded by First, Ord, Main, and Hill streets, the proposed civic center adhered to a north-south axis and would forge a link between civic buildings and the plaza. While most of the monumental buildings spelled out in the plan did not come to fruition, two – the Hall of Justice (1925, listed in the California Register) and Los Angeles City Hall (1928, City HCM #150) – were built and helped to anchor the new complex. A courthouse and post office building, designed by architect Gilbert Stanley Underwood, was added to the complex between 1937 and 1940 (listed in the National Register).⁵⁷

While new commercial and institutional development gave rise to the central business district, industrial development was swiftly transforming the blocks east of Main Street. This area had historically been occupied by a mix of agricultural land and working-class neighborhoods, but the presence of railroad depots, warehouses, and yards along Alameda Street had paved the way for industrial development nearby in the early twentieth century. Some of the area's earliest industrial properties arose adjacent to the railroad depots and consisted of buildings that supported agriculture and food processing, both early linchpins of the Southern California

⁵⁴ National Park Service, "Broadway Theater and Commercial District, Los Angeles, California," accessed May 2016.

⁵⁵ Los Angeles Conservancy, "Los Angeles Theatre," accessed May 2016.

⁵⁶ Kevin Starr, *Material Dreams: Southern California through the 1920s* (New York: Oxford University Press, 1990), 112-115.

⁵⁷ U.S. General Services Administration, "U.S. Courthouse, Los Angeles, CA," accessed May 2016.

economy. In the vicinity of Alameda Street were several cold storage warehouses, produce brokerages, fish markets, and other agricultural-related uses that took advantage of the area's proximity to freight rail.⁵⁸ As the area continued to industrialize in subsequent years, larger and more intensive industrial complexes serving the agricultural industry were built. In 1909, a multi-ethnic group of Chinese, Japanese, and Anglo farmers pooled their resources to open City Market, a wholesale produce market at San Pedro and 9th streets that eventually encompassed two city blocks.⁵⁹ In 1918, an even larger wholesale produce market, known as the Union Terminal Market (listed in the National Register), was constructed at the intersection of Central Avenue and 7th Street.⁶⁰ Designed by master architect John Parkinson, this property is notable for its immense size; its western façade alone measures a quarter of a mile in length.⁶¹

Population growth in the 1910s and 1920s sustained additional economic development and introduced many other industrial uses to the blocks east of the central business district. The area's identity as an industrial center was solidified by a sweeping zone change in 1922, which eliminated new residential uses from Downtown.⁶² Though the area clung onto some of its historical uses such as Single-Room Occupancy (SRO) hotels, it took on a much more industrial character by the 1920s as factories, printing and publishing plants, machine shops, and various other industries encroached onto blocks that had once been predominantly residential. "Stimulated in part by the arrival of runaway shops evading unionization drives in New York," a concentration of garment factories were erected in the area to the southeast of the central business district beginning in the 1920s, sowing the seeds for a robust wholesale garment trade that today is the second largest in the nation outside of New York.⁶³ Warehouses and other more utilitarian industrial uses generally clustered in areas further south and east.

The remarkable growth of the central business district and its environs in the early twentieth century was accompanied by an equally remarkable problem – traffic congestion. Traffic jams and snarled streets quickly became issues of epic proportions due to the brisk development of the central business district and a steady increase in the number of automobiles. Further complicating the situation were the hills and buttes flanking the west end of Downtown, which limited the options into and out of the city. The city initiated a number of infrastructure projects in an attempt to improve accessibility and mitigate the worst effects of congestion. Of note were several tunnels that were bored directly through these hills to allow unobstructed circulation along Broadway (1901), Third Street (1901), Hill Street (1909), and Second Street

⁵⁸ "SurveyLA Draft Historic Context Statement, Industrial Development," Aug. 26, 2011, 42-54.

⁵⁹ Tara Fickle, "A History of the Los Angeles City Market, 1930-1950," *Gum Saan Journal* 32.1 (2010).

⁶⁰ Most of the City Market property has been demolished to make way for a mixed-use development, but the Union Terminal Market remains intact and is listed in the National Register.

⁶¹ "National Register of Historic Places Nomination Form: Textile Center Building," prepared 2004.

⁶² Los Angeles Conservancy, "The Arts District: History and Architecture in Downtown L.A.," Nov. 10, 2013.

⁶³ Mary Romero, et al., *Challenging Fronteras: Structuring Latina and Latino Lives in the U.S.* (New York: Routledge, 2014), 218.

(1924).⁶⁴ Also to improve accessibility and alleviate traffic, the Pacific Electric Railway in the 1920s constructed a one-mile stretch of subway between the Subway Terminal Building on Hill Street and the Westlake district (not extant, though some of its infrastructure remains).⁶⁵ Completed in 1925, the subway transported passengers between Downtown businesses and adjacent residential areas without traversing a single Downtown street.

In addition to new transportation infrastructure, proliferation of the automobile in the 1910s and 1920s also spawned a commercial enclave to the south and west of the central business district that was oriented around the sale, repair, and maintenance of cars. Capitalizing on the enhanced role that auto travel played, particularly in Southern California, several automobile manufacturers erected large, new showrooms and repair facilities along Figueroa and Flower streets in what is now known as the South Park neighborhood. By the 1910s, the term “auto row” appeared in local newspapers and was used to describe the cluster of showrooms and associated businesses in the area.⁶⁶ Throughout Downtown, multi-story “auto parks” were woven into the central business district as early as the 1920s, providing patrons of department stores and other businesses with a convenient place to park their car while shopping. To entice motorists, many of these garages offered on-site services in addition to parking stalls. Some touted a rather robust menu of amenities including “a repair department manned by experts, a lubrication department, and a washing and polishing department ... a complete accessory and tire department with direct factory representation ... [and] a finely appointed ladies’ lounge.”⁶⁷

Pershing Square, which had once been at the far periphery of the city center, emerged as an important focal point of civic life as the central business district migrated to the south and west. In 1910, at the height of the Downtown’s early twentieth century building boom, the park underwent a renovation by master architect John Parkinson, who imposed a formal, symmetrical plan that complemented the Beaux Arts style buildings that were being erected en masse across the central business district. Under Parkinson’s plan, the park was oriented around a central plaza and a network of diagonal walkways, and featured a lush landscaping scheme composed of wide lawns, Italian cypress, and various types of tropical foliage.⁶⁸ By the 1920s, the park had become “L.A.’s indispensable civic space... [and was] a place to meet, stroll, muster troops and argue a cause, with a speaker’s corner like London’s Hyde Park.”⁶⁹

Great Depression and World War II

Downtown Los Angeles had matured into a vibrant district that acted as the commercial, institutional, and industrial hub of the Southern California region by the 1920s. However, it was also around this time that some neighborhoods around Downtown experienced decline as new

⁶⁴ Nathan Masters, “Lost Tunnels of Downtown Los Angeles,” *KCET*, Jan. 4, 2012. The Broadway and Hill Street Tunnels have been removed; the Second and Third Street Tunnels are extant, though the latter has been altered.

⁶⁵ *Ibid.*

⁶⁶ The terms “auto row” and “automobile row” first appear in *Los Angeles Times* articles from the early 1910s.

⁶⁷ “New Garage Has Features for Car Service,” *Los Angeles Times*, Sept. 13, 1925.

⁶⁸ Nathan Masters, “From Plaza Abaja to Pershing Square,” *KCET*, May 9, 2012.

⁶⁹ Wade Graham, “Why We Hate Pershing Square,” *Los Angeles Times*, Sept. 27, 2015.

development in more peripheral areas of the city slowly began to pull people away from the urban core. This trend was particularly evident in Bunker Hill. Beginning in the early twentieth century, the neighborhood lost its luster as affluent residents incrementally moved away to new residential districts in other parts of the city and, one by one, their stately mansions were subdivided into smaller, multi-family units, “most of which were occupied by single boarders in single rooms.”⁷⁰ Apartments and rooming houses that were erected nearby crowded out the mansions, and by about 1920 new construction in the neighborhood had ceased.⁷¹ The condition of buildings deteriorated as they aged and maintenance was deferred. By 1930, local officials were flirting with the possibility of razing the buildings and leveling the hill, likening the area to a “rotten apple in the barrel” that presented “a problem of concern to the entire city.”⁷²

The area around the plaza had also languished by the 1920s as the locus of development had shifted southward. Buildings had fallen into various states of disrepair, and since the area was inhabited mostly by poor, disenfranchised immigrant families it did not receive much public investment. Olvera Street, a narrow street extending north from the plaza, was a particularly derelict corridor that “had degenerated over the years into rubbish-strewn neglect.”⁷³ While walking down Olvera Street in 1928, socialite Christine Sterling was alarmed to learn that the Avila Adobe, Los Angeles’ oldest dwelling, had been condemned and was slated for demolition. Sterling thereafter launched a campaign to preserve the threatened adobe and rehabilitate the surrounding area into a themed marketplace that celebrated California’s Mexican heritage. With the financial support of benefactors including *Los Angeles Times* editor Harry Chandler, and with the help of prisoners who were brought on to carry out the work, Sterling was able to carry out her vision and transformed Olvera Street into a rich, albeit somewhat inauthentic, celebration of Los Angeles’ Mexican heritage. Named El Paseo de Los Angeles, the reinvigorated Olvera Street opened to the public in 1930 and attained instant success as a tourist attraction.⁷⁴

Development activity throughout Downtown was stymied as the economic effects of the Great Depression reverberated. Compared to the prosperous 1910s and 1920s, in which buildings were erected en masse in the central business district and in adjacent areas, the 1930s were characterized by a relative lull in new construction as consumers spent less and local real estate became less lucrative. The development of new, upscale commercial nodes like Miracle Mile and a theater district in Hollywood also began to slowly siphon patrons away from Downtown businesses, shifting the city’s center of gravity away from the central business district and into more suburban settings.⁷⁵ However, in spite of these factors Downtown did not cease to be a

⁷⁰ “Residence: 333 South Bunker Hill Avenue,” *On Bunker Hill*, Oct. 20, 2008, accessed May 2016.

⁷¹ Nathan Masters, “Rediscovering Downtown L.A.’s Lost Neighborhood of Bunker Hill,” *KCET*, Jul. 11, 2012.

⁷² “Dueling Babcocks,” *On Bunker Hill*, Oct. 20, 2008, accessed May 2016.

⁷³ Kevin Starr, *Material Dreams: Southern California Through the 1920s* (New York: Oxford University Press, 1990), 204-205.

⁷⁴ “Old Los Angeles Comes to Life Again: Thousands Attend Gala Opening of Former Olvera Street,” *Los Angeles Times*, Apr. 21, 1930. Olvera Street and the Avila Adobe are both within the boundaries of the Los Angeles Plaza National Register Historic District.

⁷⁵ Roseman, et al. (2004), 61.

focal point of commercial and civic life. Angelenos continued to travel Downtown to shop, and attendance at many of the theaters on and around Broadway remained strong. In 1939, a new passenger rail terminal, Los Angeles Union Station (City HCM #101), opened to the east of the historic plaza and consolidated the numerous rail depots that had historically been located further to the south.⁷⁶

Between the 1920s and 1960s, Downtown was a focal point for Los Angeles' gay, lesbian, bisexual, and transgender (LGBT) community, which at the time was marginalized and subjected to discrimination and harsh treatment from law enforcement and moral crusaders. The area had been a haven for gays and lesbians since the late nineteenth century, who attended masked balls and male and female impersonation acts at local theaters to meet like-minded individuals and engage in nonconforming sexual behavior.⁷⁷ Turkish bathhouses in the area also evolved into clandestine gay meeting venues. After the repeal of Prohibition in 1933, a concentration of gay-friendly bars stretched between Bunker Hill and Main Street, along a stretch of Fifth Street that became known as "The Run." Pershing Square, located near the center of "The Run," became a popular "cruising" venue and was frequented by gay and bisexual men seeking sexual partners. Cruising was also a common practice at the nearby Central Library and in the bathrooms of the Subway Terminal Building.⁷⁸ Downtown retained an important association with the LGBT community into the postwar era, when gay institutions including a chapter of the Mattachine Society, an early homophile (gay rights) organization, and *ONE* magazine set up their headquarters in the area.⁷⁹

Post-World War II Era: Decline and Redevelopment

After World War II, Downtown experienced a period of precipitous decline as middle and upper-income Angelenos vacated urban neighborhoods in favor of suburban environments. As more and more people left the central city for the suburbs, many businesses and institutions followed suit. Downtown's identity as a preeminent shopping and entertainment district was diminished as department stores, theaters, and other businesses that had long been occupants of the area relocated to locations nearer their customer base. Suburban migration was hastened by the construction of a vast network of freeways across Southern California, which rendered these outlying areas more accessible and allowed motorists to circumvent the central business district entirely. Four freeways were constructed near Downtown at this time: the Hollywood (US 101), Harbor (SR-110), and Santa Ana (I-5) Freeways were completed in the early 1950s, and the Santa Monica Freeway (I-10) opened nearly a decade later.⁸⁰ Where the 110 and 101 Freeways converged was a remarkable feat of civil engineering known as the Four Level Interchange, which was the first stack interchange in the world when it opened in 1949.⁸¹ These

⁷⁶ David Kipen, *Los Angeles in the 1930s: the WPA Guide to the City of Angels* (Berkeley: University of California Press, 2011), xxiii.

⁷⁷ "SurveyLA LGBT Historic Context Statement," Sept. 2014, 5-7.

⁷⁸ Los Angeles Conservancy, "Pershing Square," accessed May 2016.

⁷⁹ The Mattachine Society and *ONE* magazine occupied a building at 232 S. Hill Street, which is not extant.

⁸⁰ Nathan Masters, "Creating the Santa Monica Freeway," *KCET*, Sept. 10, 2012.

⁸¹ "This Day in History: The Famous 'Four Level' Opens in Los Angeles," accessed May 2016.

freeways and their infrastructure forged boundaries around Downtown and effectively walled it in from adjacent communities. The 101 Freeway yielded a particularly profound effect in this regard by severing the connection between the Civic Center and the historic plaza.

As early as the 1950s, urban renewal and redevelopment projects dramatically changed the character and composition of Downtown's built environment, sowing the seeds for the modern skyline that characterizes some of the area in the present day. A particularly transformative project involved the extensive redevelopment of Pershing Square in the early 1950s. By this time, the park had lost its allure and had become known as a gathering place for the homeless and destitute, which drew the ire of nearby business owners and Downtown stakeholders.⁸² In response to increasing complaints about the park's deteriorating state, and also in an effort to bring Los Angeles into the modern age of automobile travel, the park was bulldozed in 1951 to accommodate a three-level, subterranean parking garage that was built beneath the square.⁸³ Some perimeter plantings and a thin layer of grass were added, but otherwise the square was stripped of its lush, park-like qualities. Entrance and exit ramps to the garage dominated the perimeter of the property and forged a physical barrier between the park and its environs.

Using the power vested to its newly-established redevelopment agency, the City identified the once-posh residential neighborhood of Bunker Hill as the site of a massive redevelopment project after World War II. This area had experienced decline since at least the 1930s, but by the late 1940s it had devolved into one of city's most notorious slums. Studies led by the Community Redevelopment Agency of the City of Los Angeles (CRA) in the 1950s concluded that "Bunker Hill had many problems, as about 82 percent of the housing units were deteriorated, overcrowded, unhealthy, and unsafe ... the high cost of health, fire, and police services far exceeded the taxes collected ... [and] the many low-income single men, transients, and indigents who lived there attracted and created a Skid Row type of environment."⁸⁴ The neighborhood was also located in an area of Downtown that was ripe with development potential due to its central location and accessibility to freeways. Aided by state and federal legislation that authorized the use of eminent domain and allocated funds for the eradication of blight, the CRA developed an ambitious redevelopment plan for the neighborhood, which called for the wholesale demolition of 30 substandard city blocks, extensive grading of the hill, the platting of a new street system to overcome the area's topography, and the development of a mixed-use district composed of sleek, modern high rises. After years of planning, the Bunker Hill Redevelopment Project was approved by the City Council in 1959.⁸⁵

The redevelopment of Bunker Hill was initiated in 1960 when the CRA initiated the process of purchasing the properties that lay within the identified redevelopment zone. By 1968, every structure atop the hill had been demolished apart from two Late Victorian-era residences that

⁸² Nathan Masters, "From Plaza Abaja to Pershing Square," *KCET*, May 9, 2012.

⁸³ Los Angeles Conservancy, "Pershing Square," accessed May 2016.

⁸⁴ "The Evolution of Bunker Hill: Part Four, The Studies, 1945-1959," *LA Downtown News*, Aug. 10, 1998.

⁸⁵ CRA-LA, "Bunker Hill Urban Renewal Project: About the Project Area," accessed May 2016.

had been landmarked and were awaiting relocation to the Heritage Square Museum.⁸⁶ Angels Flight (City HCM #4), a funicular from 1901 that had traversed Bunker Hill's steep grade, was also spared from the wrecking ball, though it was dismantled and remained in storage until its reassembly in the 1990s. Starting with the construction of Union Bank Plaza in 1966, Bunker Hill was transformed from a residential district into the "financial and corporate heart of Los Angeles."⁸⁷ Over the next several decades, sleek skyscrapers, residential towers, luxury hotels, quasi-public plazas, and an array of museums and cultural facilities were constructed on 25 superblocks that had been assembled by the CRA after the bulk of the hill had been leveled.⁸⁸ The redevelopment of Bunker Hill also catalyzed the development of new, corporate office towers and monumental buildings to its immediate south, particularly along 5th and 6th streets and Wilshire Boulevard. Development gravitated even further to the south in subsequent years. A notable addition to Downtown's economy and built environment was completed in 1972, when the noted architectural firm of Charles Luckman Associates completed the Los Angeles Convention Center at the intersection of Figueroa Street and Pico Boulevard.

While the redevelopment of Bunker Hill was heralded by many civic leaders, city planners, and other champions of urban renewal, the project was also a lightning rod for controversy and was met with fervent resistance, both from neighborhood residents and those who lobbied on their behalf. So that the land could be assembled and prepared for redevelopment, scores of lower-income Angelenos were evicted from their residences, most of which were deemed "blighted," and in many cases were provided less-than-adequate relocation support. Approximately 10,000 people lost their homes and were displaced as a result of the project, and of these many were poor, elderly, or belonged to minority groups that were grossly underrepresented.⁸⁹ The residents of Bunker Hill protested the redevelopment plan and were joined by local politicians such as Edward Roybal, who derided the project as benefiting private enterprise at the expense of the poor, but these critics ultimately found themselves "lost in the political shuffle" amid the powerful interests that backed the redevelopment project.⁹⁰ In addition to its profound social implications, the project was also criticized for systemically removing nearly a century of local history and neighborhood development in less than a decade.

Many of the buildings erected on Bunker Hill and its environs after World War II benefited from the repeal of Los Angeles' height limit ordinance in 1957, which had long restricted the height of all new buildings (aside from City Hall) to 150 feet.⁹¹ In the absence of these restrictions on vertical growth, many of the buildings comprising Los Angeles' new financial district soared to

⁸⁶ Known as the Salt Box and the Castle, both residences were moved to Heritage Square in 1969 but were subsequently destroyed by fire.

⁸⁷ CRA-LA, "Bunker Hill Redevelopment Project Area Implementation Plan: FY 2010-Jan. 2012," Dec. 17, 2009.

⁸⁸ CRA-LA, "Bunker Hill Urban Renewal Project: About the Project Area," accessed May 2016.

⁸⁹ Dana Cuff, *The Provisional City: Los Angeles Stories of Architecture and Urbanism* (Cambridge: MIT Press, 2000), 301.

⁹⁰ Elizabeth A. Wheeler, *Uncontained: Urban Fiction in Postwar America* (New Brunswick: Rutgers University Press, 2001), 90.

⁹¹ Ray Hebert, "No Tall Buildings: Aesthetics, Not Quakes, Kept Lid On," *Los Angeles Times*, Jul, 8, 1985.

unprecedented heights and augmented the city's historically flat skyline. At 40 stories, Union Bank Plaza was the first building to surpass City Hall in terms of height and was soon eclipsed by even taller structures including the 42-story Crocker-Citizens Bank Tower (1969), the 55-story Security Pacific Plaza (1973), and the 62-story United California Bank Building (1973).

Redevelopment activity was not limited to Bunker Hill, but also extended into other areas in Downtown that satisfied the statutory definition of "blight." One of the more transformative and controversial examples of redevelopment activity took place in Little Tokyo, where SRO hotels and aging commercial blocks dominated the landscape and were seen as prime targets for redevelopment. Redevelopment activity in the area began with the expansion of the Los Angeles Civic Center and particularly with the construction of Parker Center in 1955, which displaced some 1,000 residents and culminated in the demolition of nearly one fourth of Little Tokyo's commercial frontage.⁹² In 1970, the CRA formally established a Project Area in Little Tokyo and adopted a redevelopment plan that called for widespread demolition of existing buildings and the construction of new housing, office buildings, recreational space, and a community center in their place.⁹³ The new development that ensued was spearheaded in large part by Japanese corporate interests, and introduced mid-rise office towers and large, contemporary shopping plazas to the area. These new types of commercial development, coupled with the displacement of longtime area residents, many of whom were older Japanese immigrants, "challenged the community's identity which historically had been shaped by the immigrant experience."⁹⁴ However, the CRA's involvement in Little Tokyo also bolstered its economy and facilitated the construction of cultural institutions such as the Japanese American Cultural and Community Center, which was constructed in 1978 and opened in 1980.⁹⁵

To the north and east of the new financial district, the Civic Center also experienced a dramatic evolution after World War II. While a Civic Center Master Plan had been adopted in the 1920s, and while three new public buildings had been erected under its auspices, the plan was never fully implemented due largely to financial constraints imposed by the Great Depression. In response to rapid population growth that affected both the City and County of Los Angeles after World War II, an agency known as the Civic Center Authority stressed the need to expand and centralize governmental services in a unified and cohesive civic center district. Their efforts culminated in the conception of a new, monumental Civic Center Plan in 1947.⁹⁶ The 1947 plan abandoned the north-south axis embraced by its predecessor and instead pivoted the trajectory of civic development to the east and west.⁹⁷ The plan called for large civic buildings to flank either side of a central axis that would act as the complex's "spine." Several

⁹² Kelly Simpson, "Three Waves of Little Tokyo Redevelopment," *KCET*, Aug. 1, 2012.

⁹³ *Ibid.*

⁹⁴ *Ibid.*

⁹⁵ Japanese American Cultural and Community Center, "History," accessed May 2016.

⁹⁶ Los Angeles Conservancy, "Kenneth Hahn Hall of Administration/Stanley Mosk Courthouse," accessed May 2016.

⁹⁷ "Civic Center: A Plan of Expansion Unfolds," *Los Angeles Times*, Jan. 2, 1948.

monumental buildings that house an array of government operations were erected in the area between the 1950s and early 1970s.

Unlike many of the nation's cities, whose central business districts were often decimated to make way for new downtowns, a majority of the historic building stock in Los Angeles remained intact. However, the westward shift of the financial district after World War II resulted in the razing of several iconic buildings and put others at risk of being demolished. To the chagrin of many Angelenos, particularly those with an interest in architecture and historic preservation, the Richfield Tower (1929), whose distinctive, black-and-gold façade rendered it one of the city's finest examples of the Art Deco style, was razed in the late 1960s and replaced by a pair of modern corporate office towers.⁹⁸ Other buildings suffered a similar fate, particularly those that were located around the emerging financial district and those that sat atop Bunker Hill. However, out of this trend emerged a preservation ethic among those who were interested in conserving and celebrating the city's past. After the Central Library (1926, City HCM #46) was slated for demolition in the late 1970s, a group of concerned citizens mobilized to save it. Their efforts, which ultimately proved successful, resulted in the establishment of the Los Angeles Conservancy, which is today the country's largest local non-profit preservation organization.⁹⁹

As Downtown businesses moved to the suburbs, and offices and financial institutions relocated to new skyscrapers erected on and around Bunker Hill, older commercial buildings in the Historic Core were slowly, but steadily, vacated. By the 1970s, many of these buildings were unoccupied above the ground story, and some were abandoned altogether.¹⁰⁰ While a vast majority of the area's historic buildings remained intact, some were demolished and replaced by surface parking lots, which were seen by some investors as more lucrative than the vacant and often derelict buildings that they replaced. By the 1980s, the once-vibrant commercial heart of Los Angeles had become overridden by the sale and use of illicit drugs, homelessness, and other problems afflicting the nation's cities. Spring Street, which had been a thriving financial hub, became known for its motley crew of panhandlers, the mentally ill, drug addicts, and hawkers of goods "probably not obtained through the usual wholesale sources."¹⁰¹ One area of the Historic Core that was able to remain vibrant was Broadway, which by this time had evolved into a bustling commercial district among the Latino community.

Homelessness and other social problems were even more rampant in the area located to the east of Main Street and the Historic Core, which had become known as Los Angeles' "Skid Row." Since the late nineteenth century, this area had been the domain of an indigent population because of its abundance of residential hotels adjacent to early rail terminals. These

⁹⁸ David Gebhard and Robert Winter, *An Architectural Guidebook to Los Angeles* (Salt Lake City: Gibbs Smith, 2004), 242.

⁹⁹ Los Angeles Conservancy, "Central Library," accessed May 2016.

¹⁰⁰ City of Los Angeles, "Central City Community Plan," n.d., I-9.

¹⁰¹ Bill Boyarsky, "There is a Los Angeles on Which the Recovery's Light Has Yet to Shine," *Los Angeles Times*, Jan. 1, 1984.

hotels provided cheap, short-term accommodations and were accompanied by several missions that had long operated nearby to provide “a sermon and a cup of soup for the population of hard-drinking single men.”¹⁰² The area’s reputation as a bastion of urban disorder was solidified by a “policy of containment” that was adopted by the city in 1975, which sought to concentrate social service agencies and homeless individuals in an area bounded by 3rd, 7th, and Main streets and Central Avenue.¹⁰³ Despite the best efforts of social service organizations and not-for-profit agencies such as the Skid Row Housing Trust, which has converted thousands of dilapidated Single-Room Occupancy (SRO) hotel rooms in the area into affordable housing units, Skid Row continues to house one of the largest stable populations of homeless individuals in the United States.

Native Americans in Downtown Los Angeles were especially afflicted by homelessness in the postwar era. Spurred by the Indian Relocation Act of 1956, a federal law that encouraged Native Americans to leave reservations and assimilate into the general population, Los Angeles’ Native American population “swelled from 12,000 in 1960 to 25,000 in 1966.”¹⁰⁴ Due to a long history of marginalization, many of the Native Americans who arrived in Los Angeles from other parts of the country ended up homeless and addicted to alcohol and other substances. Many congregated along the 400 block of Werdin Place, a narrow alley that runs between Winston and Fifth streets, between Main and Los Angeles streets, which became known as “Indian Alley” and earned a reputation for its particularly dangerous conditions. However, the alley also served as a “central point where people came together and were able to find their relatives after relocation.”¹⁰⁵ An effort to improve conditions on Indian Alley was spearheaded in 1973, when a drug and alcohol treatment center known as United American Indian Involvement, Inc. (UAI) set up shop in a derelict, three-story building at the corner of Winston Street and Werdin Place. Founded by Baba Cooper, who was reportedly Sioux, UAI provided “hot meals, showers, beds, referrals, and emergency medical care” to homeless Native Americans, and was staffed entirely by those of Native American descent.¹⁰⁶ Though UAI has since relocated, the Native American heritage of Indian Alley has been resurrected by the installation of murals and other examples of street art depicting significant themes and motifs in Native American culture.

Once a focal point of civic life among those who lived and worked Downtown, Pershing Square became a particularly evocative symbol of the challenges afflicting urban environments after World War II. The park devolved into a refuge for the homeless and indigent as businesses and people vacated the Historic Core. The *Los Angeles Times* in 1984 noted that “drunks and a plethora of down-and-outers tarnished the square.”¹⁰⁷ Efforts to revitalize the park were complicated by the parking access ramps that were added to its perimeter in the 1950s, which

¹⁰² “For Some, L.A.’s Skid Row is for Beginnings,” *NPR*, Apr. 20, 2009.

¹⁰³ *Ibid*; Los Angeles Area Chamber of Commerce, “History of Downtown Los Angeles’ ‘Skid Row,’” n.d.

¹⁰⁴ Christina Rose, “Skid Row’s Indian Alley Adorned with Native Murals to Honor Tragic Past,” accessed June 2016.

¹⁰⁵ *Ibid*.

¹⁰⁶ Nicolas G. Rosenthal, *Reimagining Indian Country: Native American Migration and Identity in Twentieth Century Los Angeles* (Chapel Hill: University of North Carolina Press, 2012), 129.

¹⁰⁷ Cecilia Rasmussen, “The (D)evolution of a Downtown Landmark,” *Los Angeles Times*, Aug. 19, 2007.

forged a barrier between Pershing Square and its environs and created an environment that many criticized as inhospitable. After financing a minor facelift of the park in preparation for the 1984 Olympics, the City embarked upon an overhaul of Pershing Square in 1992 which was carried out by architect Ricardo Legorreta, landscape architect Laurie Olin, and artist Barbara McCarrren. When it re-opened in 1994, the park touted a completely new appearance with abundant hardscape features, vivid geometric structures, and a ten-story bell tower. Its design also incorporated many public art pieces and design features – including an orange grove and a stylized earthquake fault – that allude to themes in the history of Southern California.¹⁰⁸

Contemporary Development and Revitalization

Some areas within the CPA suffered from deterioration in the postwar era, but Downtown was also home to an increasingly enlivened visual and performing arts culture at this time. The area's identity as a center of arts and culture was set into motion in the 1960s, when the architectural firm of Welton Becket and Associates, in collaboration with philanthropist Dorothy Buffum Chandler, developed a monumental performing arts complex at the north end of Bunker Hill. Known as the Music Center, the complex hosted numerous events including the Academy Awards, and was touted as "one of the nation's foremost cultural sites."¹⁰⁹ Other arts institutions subsequently opened nearby. In 1983, the Museum of Contemporary Art (MOCA) opened an exhibition space near Little Tokyo called the "Temporary Contemporary" before moving to a permanent site on Grand Avenue in 1986.¹¹⁰ Construction of the performing arts-oriented Colburn School (1998), Walt Disney Concert Hall (2003), and the Broad museum (2015) have solidified Grand Avenue's identity as a focal point of the arts in Los Angeles. The arts and culture scene in Los Angeles has further been bolstered by the adoption of percent-for-art programs by both the CRA and the City's Department of Cultural Affairs, which require that a percentage of construction costs be earmarked for public art projects. These programs have resulted in the addition of many vivid and evocative art installations throughout Bunker Hill, the Financial District, and the Civic Center, which enliven the built environments of these areas.

After languishing for decades, the Historic Core experienced a renaissance beginning in the early 2000s that has transformed the neglected district into a vibrant live-work community. The resurgence of Downtown is attributed to myriad factors, some of which are more structural – such as increased interest in urban environments among young, educated adults – and others which are the direct result of policy initiatives and redevelopment directives. What is generally considered to be the single greatest policy influence on the area's revitalization was the adoption of the City's Adaptive Reuse Ordinance in 1999, which encouraged the conversion of the area's abandoned commercial buildings into residential units by expediting project review and easing certain code and zoning requirements for historic buildings.¹¹¹ In 2008, City Councilman Jose Huizar unveiled a revitalization plan for the Broadway corridor called Bringing

¹⁰⁸ Los Angeles Conservancy, "Pershing Square," accessed June 2016.

¹⁰⁹ "Music Center Heralded as Cultural Milestone," *Los Angeles Times*, Jul, 10, 1960.

¹¹⁰ University of Southern California, "Museum of Contemporary Art," accessed May 2016.

¹¹¹ City of Los Angeles Office of Historic Resources, "Adaptive Reuse Ordinance," accessed May 2016.

Back Broadway, which has enlivened the streetscape and has facilitated new commercial development along the street.¹¹² Due in large part to these policy initiatives, Downtown has experienced a tremendous amount of residential and commercial development and is touted as one of the nation's most up-and-coming urban areas, with a young professional population and some of "the city's hippest new restaurants and boutiques."¹¹³ Public facilities such as Grand Park (2008) and Spring Street Park (2013) have opened to serve the area's steadily-increasing resident base. The area's oldest public park, Pershing Square, is on the cusp of a major remodel that will replace the present-day park design completed by Legorreta and Olin in 1992.

To the south and west of the Historic Core, the South Park neighborhood has also experienced a significant wave of new development since the early 2000s. "Dismissed for decades as an asphalt-laden wasteland" composed of small warehouses, apartment houses, and parking lots, South Park experienced a boon in 1999 when the Staples Center, a new multi-purpose sports arena, opened adjacent to the Los Angeles Convention Center and helped to cement the area's identity as a dynamic entertainment district.¹¹⁴ Since the early 2000s, many mid and high-rise apartment, condominium, and hotel projects have been completed and have transformed the area's once-moribund blocks into a vibrant, mixed-use urban community. In 2007, the area made headlines as the site of the first new full-service grocery store to open in Downtown in several decades.¹¹⁵ L.A. Live, a contemporary entertainment and retail complex complete with restaurants, shops, theaters, museums, and associated commercial uses, opened between 2007 and 2009 and instantly became a destination and prominent anchor of South Park. The neighborhood, like many other areas in Downtown, is poised to evolve even more in coming years as many new development projects are either under construction or in the pipeline.

Designated Resources

The following map depicts the location of designated resources within the Central City CPA at the time of the survey. These include properties listed in the National Register of Historic Places (NR) and/or the California Register of Historical Resources (CR), California Historical Landmarks (CHL), and locally designated Los Angeles Historic-Cultural Monuments (HCM).

Many properties within the CPA have already been designated and were not evaluated as part of SurveyLA. This includes four historic districts that are listed in the National Register: the Los Angeles Plaza Historic District (designated 1972), the Broadway Theater and Commercial District (1979), the Spring Street Financial District (1979), and the Little Tokyo Historic District (1986, also listed as a National Historic Landmark in 1995). In addition, 113 properties are

¹¹² Richard Guzmán, "A Halfway Point for Bringing Back Broadway," *Los Angeles Downtown News*, Feb. 4, 2013.

¹¹³ Tamara Audi, "Los Angeles Gets Serious About its Downtown," *The Wall Street Journal*, Dec. 27, 2013.

¹¹⁴ Roger Vincent, "Downtown L.A.'s South Park Catching a Wave of New Development," *Los Angeles Times*, Jan. 19, 2014.

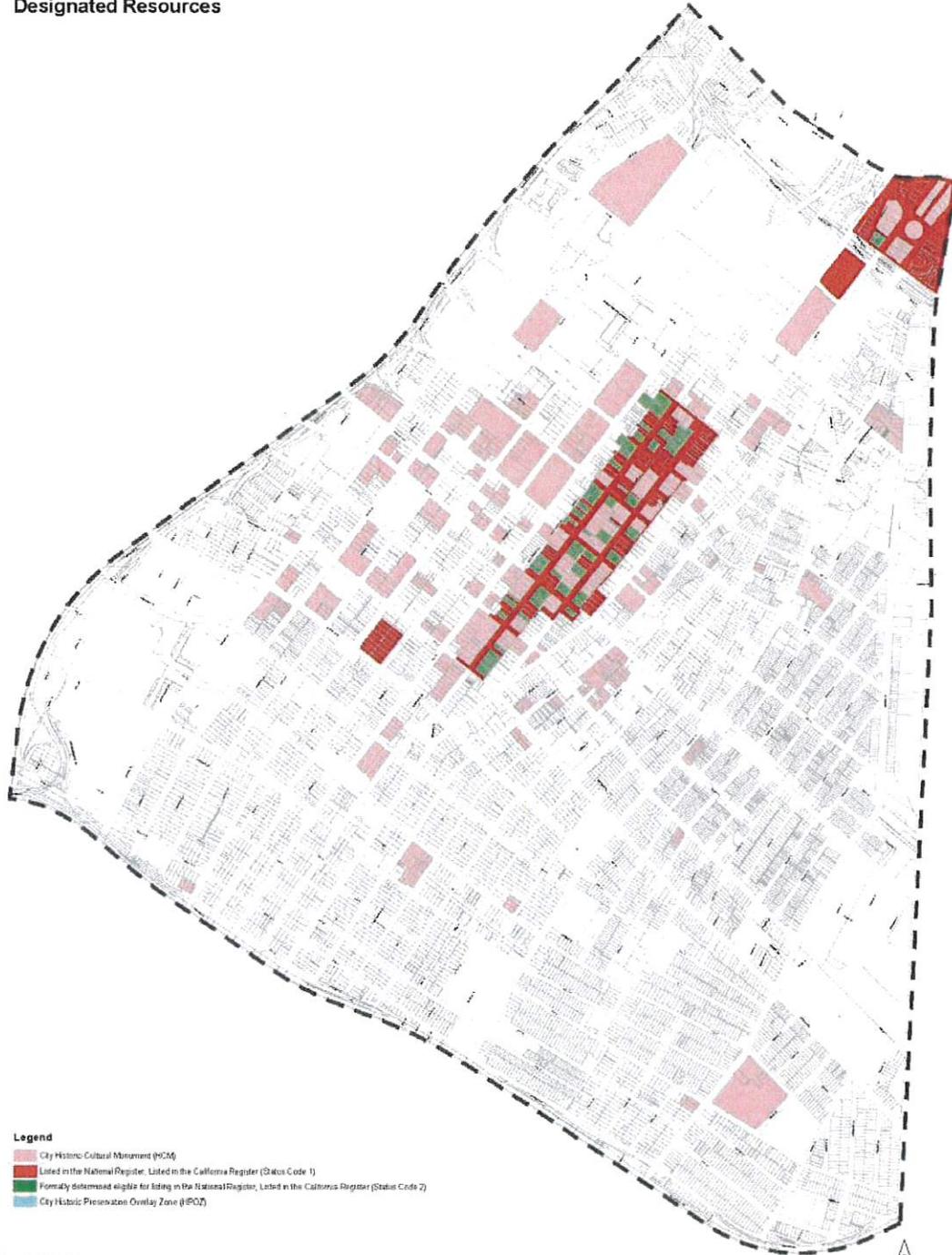
¹¹⁵ Jones Lang LaSalle, "South Park Emerging as Downtown's Most Vibrant District," Dec. 2013, 3.

individually listed as Historic-Cultural Monuments, and many others are individually listed in the National Register and/or California Register. Currently, there are no locally-designated Historic Preservation Overlay Zones (HPOZ) located within the CPA. For the most up-to-date information on designated resources refer to ZIMAS.lacity.org and HistoricPlacesLA.org, or contact the Los Angeles Department of City Planning's Office of Historic Resources.

In 2009, a number of properties in the CPA were surveyed as part of the federal Section 106 and California Environmental Quality Act (CEQA) review processes for the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector project. This project involves the construction of a new subway line and associated infrastructure between the Financial District and Little Tokyo. The survey evaluated buildings and planning features within the project area against eligibility criteria for the National Register and California Register. Several resources were determined to be individually eligible for federal and/or state listing, and a grouping of buildings and site features in the Civic Center was identified as a National Register-eligible historic district. Resources identified as eligible in the Regional Connector survey were recorded as part of SurveyLA.¹¹⁶ SurveyLA also recorded two other historic districts that had previously been determined eligible through the Section 106 review process: a commercial district near the intersection of Main and 5th streets, and a district of Single-Room Occupancy (SRO) hotels located in Central City East. Resources that were formally determined eligible for listing through the Section 106 review process are listed in the California Register.

¹¹⁶ The Regional Connector survey evaluated eligibility for listing in the National Register (NR) and California Register (CR). In a few instances, properties that were deemed ineligible for the NR or CR were found to meet local eligibility criteria by the SurveyLA team. Local eligibility was not assessed by the Regional Connector survey.

Central City Designated Resources



Community Plan Area Survey Methodology

The survey of the Central City CPA was conducted using the methodology established by the OHR for SurveyLA which includes the Citywide Historic Context Statement and customized mobile Field Guide Survey System (FiGSS).¹¹⁷ Concurrent with the survey of the Central City CPA, one additional survey, Central City North, was also surveyed.

The fieldwork was conducted in two phases: *reconnaissance* and *documentation*. The reconnaissance phase was conducted by the project managers and key staff of both CPA surveys, all of whom meet the Secretary of the Interior's *Professional Qualifications Standards*. This phase involved a detailed and methodical review of each neighborhood, street, and individual property within the Survey Area. It was during this phase that decisions were made about which properties and districts should be documented, and how those properties should be evaluated. During this initial reconnaissance phase, surveyors reviewed pre-loaded data submitted by community members to MyHistoricLA, identified concentrations of resources that might later be recorded as eligible historic districts and planning districts, and developed lists of pre-field research tasks that would help inform the field survey. By making these decisions up front and as a team, this methodology ensures a more thoughtful approach to resource identification and evaluation, creates greater consensus among the field survey teams, and produces more consistent survey results across CPAs. This approach also substantially streamlines the next phase of field survey, enabling the field teams to document large numbers of properties quickly and efficiently.

During the reconnaissance phase, ARG created Geographic Information Systems (GIS) maps of each neighborhood; these maps were printed for use in the field. A blank map showing only street names, address numbers, and parcel lines was used by surveyors in the field for notes and comments about resources identified during the reconnaissance phase. Another map featured parcels shaded by decade of building construction, which helped to illustrate chronological development patterns and concentrations of resources.

Once the reconnaissance phase was completed, the documentation phase began. During this phase, fieldwork was conducted by teams of two. Properties that were identified during the previous phase, along with those that had significant associative qualities identified in pre-loaded data in FiGSS, were recorded and evaluated for potential historic, cultural, or architectural significance. Documentation included a digital photograph, recordation of historic features and subsequent alterations, and the reason for a property's potential historic significance. It was also during this phase that contexts and themes were applied and evaluation status codes were assigned.

¹¹⁷ For more information about the SurveyLA methodology, see the *SurveyLA Field Results Master Report*.

Surveyed properties included residential, commercial, institutional, and industrial buildings and important landscape and infrastructure features such as bridges, designed landscapes, and public art. All fieldwork was conducted from the public right-of-way. Following the completion of fieldwork, all survey data was reviewed in detail by a qualified survey professional to ensure accuracy and consistency throughout the data set.

Survey teams conducted research on individual properties and neighborhoods throughout the field survey process. When specific information was needed in order to complete an evaluation, additional research was conducted. Sources included building permits, historical newspapers and periodicals, Sanborn maps, tract maps, and city directories. Other sources include the collections of the Los Angeles Public Library; Online Archive of California; University of Southern California (USC); University of California, Los Angeles (UCLA); and the Library of Congress archives. This research helped with the identification of historic tract names and boundaries, names of tract subdividers, dates of subdivision, and original building uses and footprints.

Many properties within the CPA are also located within the boundaries of a Community Redevelopment Agency (CRA) project area. While the CRA commissioned historic resource surveys of several Downtown project areas, none of these surveys were completed recently. Consistent with SurveyLA methodology, parcels within CRA project areas were re-evaluated as part of SurveyLA. Findings from previous CRA surveys were referenced as needed.

Summary of Findings

The following discussion of Property Types, Contexts, and Themes relates to the resources identified and recorded as eligible for designation.

Summary of Property Types

In terms of land use, the Central City CPA is very diverse and includes a variety of residential, commercial, institutional, and industrial properties. These properties were built over a broad period that ranges from the nineteenth century to the present-day. Accordingly, resources identified in the survey encompass an array of property types and periods of development, with commercial, institutional, and industrial resources being the most common. Less common, but present nonetheless, are residential properties, particularly multi-family, and urban open spaces. Following is a summary of the property types within the CPA that were documented and evaluated as significant.

Residential Properties

Since Downtown Los Angeles is predominantly a center of commerce, government, and industry, residential development accounts for a relatively small proportion of the Central City CPA's built environment. Relatively few residential resources were identified by the survey. This included one single-family residence that was constructed in 1908 and is located in an area that is now predominantly industrial. It is notable as the last known intact example of a single-family house in the area. The survey also identified several early apartment houses that were built between the early 1900s and 1920s, and are also rare vestiges of early residential development. All of these apartment houses are located in the South Park neighborhood. Most are simple buildings that do not embody a particular architectural style, but one was also evaluated as an excellent example of Renaissance Revival architecture. Other residential resources include a 1970s apartment tower that is notable for its modular construction, and a high-rise residential complex on Bunker Hill that played an important role in the redevelopment of the area after World War II and is also an excellent example of Corporate International architecture.

Commercial Properties

Since it has long been an important center of commerce and finance, Downtown Los Angeles consists of numerous commercial resources, most of which are concentrated along corridors in the Historic Core and on superblocks in both Bunker Hill and the Financial District. Commercial resources were constructed between the late nineteenth century and the present day, and mirror the development and evolution of Downtown Los Angeles over time. Given this history, commercial properties account for a majority of resources identified in the survey; eligible

commercial property types include both individual resources and concentrations of resources (historic districts and planning districts).

Many of the commercial properties identified as individually eligible resources are mixed-use commercial buildings that were constructed between the 1910s and 1930s. Generally constructed with retail stores on the ground story and offices up above, these resources typify patterns of early twentieth century commercial development and the growth of Los Angeles' central business district. These buildings were almost always designed by noted architects and were evaluated as excellent examples of their respective architectural styles, with Beaux Arts, Renaissance Revival, and Art Deco being the most common.

Several examples of commercial lodging were identified as individually eligible resources. Specifically, the survey identified several hotels that were constructed in the early decades of the twentieth century, when the central business district was at its peak and Downtown was an important regional destination. In addition to conventional hotels, some examples of residential hotels were also identified as individual resources. Three residential hotels were identified as establishments that catered to Chinese American and African American laborers, who were employed in nearby industries but were excluded from many commercial establishments because of widespread discrimination. Others were evaluated as rare intact examples of the property type. Two small historic districts composed of early twentieth century Single-Room Occupancy (SRO) hotels were also identified by the survey. One example of a 1970s hotel building was evaluated as an excellent example of Late Modern architecture.

The survey identified properties that are individually eligible for their association with the early rise of the car and car culture. Included were several early automobile showrooms dating to the 1910s and 1920s; accessory shops, repair facilities, and other commercial uses geared toward motorists; and three examples of parking structures that date to the 1920s and are among the earliest known examples of the property type in the city. Also identified was a parking structure that was designed by noted architects Wurdeman and Becket in 1948, and was the first parking structure to be erected following the adoption of a City ordinance that required new buildings in Downtown to be accompanied by parking.

Other examples of commercial properties that were identified as individual resources include department stores dating to the early twentieth century; three examples of motion picture theaters built in the 1910s and 1920s; one example of a commercial complex notable for its association with the local fashion industry; former bank buildings that are located outside of the National Register-designated Spring Street Financial District boundaries; a handful of stores and restaurants; and several postwar office towers that are excellent examples of the Corporate International style and, in many instances, are also significant for their association with patterns of corporate growth and development after World War II. Some of these office towers are accompanied by significant designed landscapes and notable examples of public art.

The survey also identified a number of important, long-term businesses that contribute to the commercial identity of Los Angeles and are regarded as local institutions.

Three commercial historic districts and one commercial planning district were identified in the Survey Area. Two of the historic districts represent early twentieth century patterns of commercial growth and development Downtown. Each district also contains an excellent concentration of early twentieth century commercial architecture, with many notable examples of the Beaux Arts style. Several of the contributing buildings within these districts were also evaluated as individually significant resources as part of SurveyLA. The third historic district contains an excellent concentration of late nineteenth and early twentieth century commercial architecture. The planning district is significant for its association with Los Angeles' garment and textile industries, linchpins of the local economy. Since it is defined largely by its ephemeral qualities and not by its buildings or physical fabric, it does not meet eligibility standards as a historic district but may merit special consideration in local planning.

Industrial Properties

Industrial development in the Survey Area is generally confined to the area east of Main Street, which is one of the city's primary industrial zones. Industrial properties represent the third most common resource type in the Survey Area after commercial and institutional properties.

Most of the industrial resources identified in the survey were evaluated as individual resources. Some were evaluated because they represent very early patterns of industrial development in the area and are rare, intact examples of industrial properties from the late nineteenth and early twentieth centuries. Most others were evaluated as excellent examples of a particular industrial property type, such as a daylight factory or industrial loft, or for their association with a specific industry important to the economy of Los Angeles including garment manufacturing, agriculture, or food processing. Two industrial properties were evaluated since they were the site of strikes or other incidents related to the city's labor history. Two industrial resources were evaluated and recorded as historic districts.

Generally, industrial properties identified in the survey lack architectural distinction and are simple, utilitarian buildings. However, some were designed by noted architects and builders and/or are excellent examples of a particular architectural style. Of note are seven industrial lofts from the 1920s that were designed by architect W. Douglas Lee and built by contractor Florence C. Casler. Casler was an influential figure in the early industrial development of Los Angeles and helped to break down gender barriers in the construction industry, which at the time was dominated by men. She is notable as one of very few influential industrialists of her era. Buildings associated with Casler are designed in the Late Gothic Revival style, and stand out for their high quality design and impeccable attention to architectural detail.

The Garment Industry Planning District was identified by the survey, which includes a concentration of buildings that are associated with Los Angeles' garment and textile industries. These buildings collectively evoke a distinctive sense of place and reflect patterns of development related to the garment and textile trades, both of which have been important facets of the city's industrial economy since the 1920s. Since many buildings have been altered and a considerable amount of infill development has taken place, the district does not appear to retain sufficient integrity for historic district designation but may merit special consideration in local planning.

Institutional Properties

The survey identified a number of public and private institutional properties, which are not concentrated in a specific section of the Survey Area but are rather interspersed throughout its boundaries. Eligible institutional property types were recorded both as individual resources and as districts, depending on the number of significant resources present at a given site.

Institutional resources consist largely of public buildings that were built to accommodate the growth of Downtown and surrounding areas. Specifically, the survey identified four Department of Water and Power (DWP) facilities, including both distribution and receiving stations; two fire stations; two examples of telephone exchange buildings; a rare example of a pre-World War II post office; an LAUSD middle school campus dating to the post-1933 Long Beach Earthquake period of school construction; and a public health administration complex that is significant for its role in the expansion of health and medicine and was also evaluated as an excellent example of Corporate International architecture. Four examples of performing arts venues were also evaluated, which were privately funded but are regarded as civic institutions. Several examples of public art were identified, most of which are associated with an eligible building or complex.

Private institutions include two religious buildings that date to the 1920s and 1930s and are rare remaining examples of religious property types in the area, three examples of religious buildings that are significant for their association with a particular ethnic or cultural group, and three examples of buildings that were erected for important fraternal organizations. One example of a cultural and community center serving the Japanese American community of Little Tokyo was also evaluated as an individually eligible resource.

Four resources were identified as institutions important to Los Angeles' lesbian, gay, bisexual, and transgender (LGBT) community. This includes a former theater where LGBT individuals attended masked balls, a Turkish bathhouse that has been in continuous operation since 1906 and is the City's oldest gay bathhouse, and the former sites of two influential gay bars.

The survey recorded one institutional historic district that encompasses the Los Angeles Civic Center, and is composed of fifteen contributing buildings and several associated site features. The district is significant for its association with master planning efforts related to the Civic

Center, and also as an excellent concentration of various architectural styles as applied to an institutional context. This historic district had previously been determined eligible for the National Register and California Register through the federal Section 106 and California Environmental Quality Act (CEQA) review processes for the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector Transit Corridor project. This SurveyLA evaluation recorded the findings of the previous survey.

Some institutional resources were recorded as non-parcel resources. This includes twelve air raid sirens that are associated with civil defense efforts during World War II and the Cold War. The survey also identified several excellent, cohesive concentrations of historic streetlights that were installed by the Bureau of Power and Light in the early decades of the twentieth century.

Other Properties

The survey identified three significant examples of public infrastructure. This includes a concrete tunnel (Second Street Tunnel) that dates to the 1920s, and an overpass (Temple Street Grade Separation) that was built by the Works Progress Administration in the late 1930s and was the nation's first diamond interchange. Both were constructed as part of a concerted effort on the part of public officials to alleviate traffic congestion Downtown. Also identified was a segment of a retaining wall that delineated a rooming house on Bunker Hill, which is a very rare remaining example of a site feature associated with the community prior to its redevelopment. The survey identified a network of elevated pedestrian corridors, or "pedways," in Bunker Hill.

Summary of Contexts and Themes

Many of the Contexts and Themes developed as part of the SurveyLA Citywide Historic Context Statement are represented in the Central City CPA. Following is a representative sampling of some of the more common Context/Theme combinations that were used in the Survey Area, as well as several combinations that are either particularly representative or unique components of the area's developmental history. Each Context/Theme combination listed is illustrated with specific examples from the Survey Area.

Appendix A includes a complete list of all individual resources identified as meeting eligibility standards and criteria for the National Register, California Register, and/or HCM/HPOZ.

Appendix B includes a complete list of all non-parcel resources identified as meeting eligibility standards and criteria for the National Register, California Register, and/or HCM/HPOZ.

Appendix C includes a complete list of historic districts identified as meeting eligibility standards and criteria for the National Register, California Register, and/or HCM/HPOZ. This appendix also

includes Planning Districts, which do not meet eligibility standards and criteria for listing but may warrant special consideration for local planning purposes.

Context: Commercial Development, 1850-1980

Theme: Hotels, 1880-1980

In the early twentieth century, the hospitality industry flourished in Downtown Los Angeles as the area was experiencing an unprecedented wave of commercial growth. Numerous hotels were erected both within and around the central business district to accommodate the scores of visitors who arrived in Los Angeles by train. This Context/Theme combination was used to evaluate extant hotels that date to the early twentieth century and reflect the early growth and prominence of Los Angeles' central business district. These hotels range from more modest operations such as the St. George (top left) and El Rey (top right), to middle-of-the-road accommodations such as the Stillwell (bottom right), to the Rosslyn (bottom left), which upon its construction was considered to be the most opulent hotel in the city. Many were also evaluated as an excellent example of an architectural style and were designed by a noted architect.



Name: Hotel Bisbee/St. George Hotel

Address: 115 E. Third St.

Architect: Arthur L. Haley

Date: 1905



Name: El Rey Hotel

Address: 511 E. Sixth St.

Architect: Charles F. Whittlesey

Date: 1926



Name: Hotel Rosslyn

Address: 111 W. Fifth St.

Architect: Parkinson and Bergstrom

Date: 1912



Name: Hotel Stillwell

Address: 838 S. Grand Ave.

Architect: Noonan and Kysor

Date: 1913

Context: Commercial Development, 1850-1980

Theme: Department Stores, 1920-1980

Prior to World War II, almost all of Los Angeles' premiere department stores were located in the central business district, with high concentrations along the Seventh Street and Broadway commercial corridors. Department stores including the Broadway, Bullocks, Hamburgers/the May Company, and many other local retailers had a presence Downtown, which was the center of commercial activity in the city before suburban shopping malls eclipsed the central business district after World War II. This Context/Theme combination was used to evaluate five early department stores in the Survey Area. In addition to their association with commercial development, two of the buildings (top row), which were constructed for the Coulter's Dry Goods and Ville de Paris department stores, were also evaluated as excellent examples of Beaux Arts commercial architecture. Both were designed by noted architects Dodd and Richards.



Name: Coulter's Dry Goods Store
Address: 500 W. Seventh St.
Architect: Dodd and Richards
Date: 1917



Name: Ville de Paris
Address: 420 W. Seventh St.
Architect: Dodd and Richards
Date: 1917



Name: Famous Army and Navy Department Store
Address: 531 S. Los Angeles St.
Architect: Curlett and Beelman
Date: 1926



Name: Dearden's Home Furnishings
Address: 700 S. Main St.
Architect: John Parkinson (remodel)
Date: 1904

Context: Commercial Development, 1850-1980

Theme: Commercial Development and the Automobile, 1910-1980

Sub-Theme: The Car and Car Services, 1910-1960

Reflecting the increasing popularity and accessibility of automobile travel, a number of auto-oriented commercial properties were developed in and around the central business district in the early twentieth century. Significant examples of auto-oriented commercial development were evaluated using this Context/Theme combination. These resources include several early examples of automobile showrooms (top row) that clustered to the south and west of the central business district in what is now known as South Park; and three examples of parking structures (bottom row) that were constructed in the 1920s and are among the earliest known examples of the property type in Los Angeles. Many of the parking structures included washing, detailing, and maintenance on-site and touted these services as a way to lure in customers.



Name: Willys-Knight Building
Address: 425 W. Eleventh St.
Architect: Morgan, Walls and Morgan
Date: 1919



Name: Felix Chevrolet
Address: 1201 S. Grand Ave.
Architect: William Richards
Date: 1931



Name: Santee Public Garage
Address: 840 S. Santee St.
Architect: Burnett and Dodge
Date: 1926



Name: Auto Center Garage
Address: 746 S. Hope St.
Architect: Noerenberg and Johnson
Date: 1925

Context: Commercial Development, 1850-1980

Theme: Commercial Identity, 1920-1980

Downtown Los Angeles is home to several long-term businesses that, over time, have evolved into local commercial institutions. Such businesses have played an integral role in defining the area's commercial identity. This Context/Theme combination was used to evaluate local businesses that are well-known components of Downtown's commercial landscape. Several of these businesses (top row) are significant for their association with one of the many ethnic enclaves that have historically developed at the edges of the central business district. Others have been in operation for many decades such as the King Eddy Saloon (bottom left), which has officially been in operation since the lifting of Prohibition in 1933 but is rumored to have been "fronted" by a piano shop in previous years, when the consumption of alcohol was illegal. This Context/Theme combination was also used to evaluate one planning district, Santee Alley (bottom right), which has been a key destination among fashion connoisseurs since the 1970s.



Name: Japanese Village Plaza

Address: 335 E. Second St.

Date: 1978



Name: Paul's Kitchen

Address: 1012 S. San Pedro St.

Date: 1968



Name: King Eddy Saloon (inside King Edward Hotel)

Address: 121 E. Fifth St.

Date: 1933



Name: Santee Alley Commercial Planning District

Location: Santee Alley, between Olympic Bl. and 12th St

Date: c. 1975

Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Government Infrastructure and Services, 1850-1980

Theme: Municipal Water and Power, 1916-1980

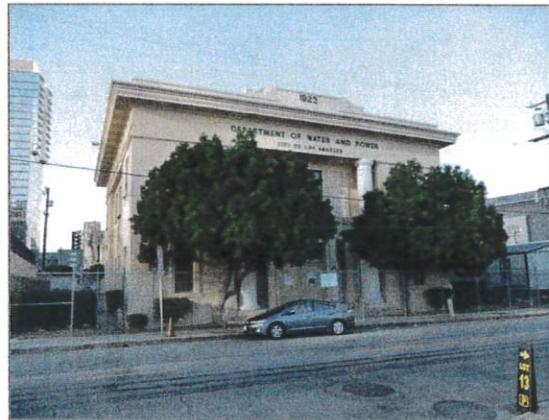
Population growth in and around Downtown necessitated the expansion of municipal services related to the distribution of power. Three examples of distributing stations associated with the Department of Water and Power (DWP) were evaluated using this Context/Theme combination. One of the distributing stations (bottom left) was originally used by Southern California Edison but was acquired by DWP in 1922, when Edison sold its distribution system to the City. The other two were purpose-built as DWP distributing stations. Each was also evaluated as an excellent example of a particular architectural style; the station that was originally used by Southern California Edison was designed by master architect John Parkinson.



Name: DWP Distributing Station No. 34

Address: 1027 S. Santee St.

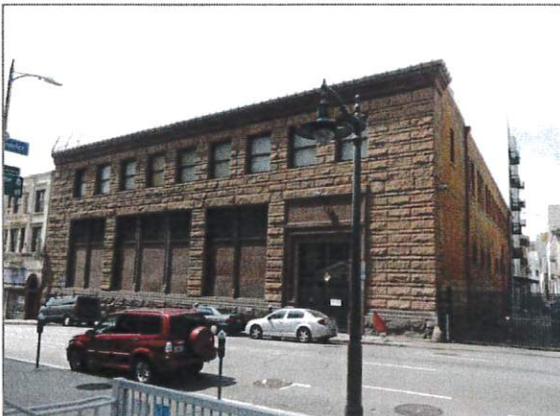
Date: 1925



Name: DWP Distributing Station No. 9

Address: 926 S. Francisco St.

Date: 1923



Name: DWP Distributing Station No. 12

Address: 120 E. Fourth St.

Architect: John Parkinson

Date: 1903

Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Government Infrastructure and Services, 1850-1980

Theme: Municipal Fire Stations, 1900-1980

Theme: Federal Infrastructure and Services, 1850-1980

Located within the Survey Area are several significant examples of government infrastructure and services that facilitated and sustained the community's development. Resources identified under these Context/Theme combinations are associated with different periods of the area's development history. Notable examples include facilities that were built to accommodate population growth in and around the Downtown area including two municipal fire station (top row), and a rare example of a pre-World War II post office facility (bottom left) that is one of few examples from this era in the City. The post office is a vestige of residential development that once prevailed in this area of Downtown but was incrementally supplanted by industry.



Name: Fire Station No. 9
Address: 430 E. Seventh St.
Architect: Orr, Strange and Inslee
Date: 1959



Name: Fire Station No. 10
Address: 1355 S. Olive St.
Architect: Orr, Strange and Inslee
Date: 1951



Name: U.S. Post Office, Market Station Branch
Address: 1122 E. Seventh St.
Architect: John M. Cooper
Date: 1940

Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Religion and Spirituality, 1850-1980

Theme: Religion and Spirituality and Ethnic/Cultural Associations, 1850-1980

For many years, housing restrictions and other forms of institutionalized segregation relegated minorities to the peripheral areas around the central business district where vibrant ethnic enclaves emerged. Within these enclaves, churches not only functioned as places of worship but also served as focal points of community life. This Context/Theme combination was used to evaluate three churches associated with the various ethnic enclaves that developed around Downtown. Two of these churches (top row) are located in Little Tokyo and have longstanding associations with the Japanese American community; the third (bottom left) is a rare example of an extant church associated with Market Chinatown, a small Chinese American enclave that developed adjacent to one of the City's largest wholesale produce markets.

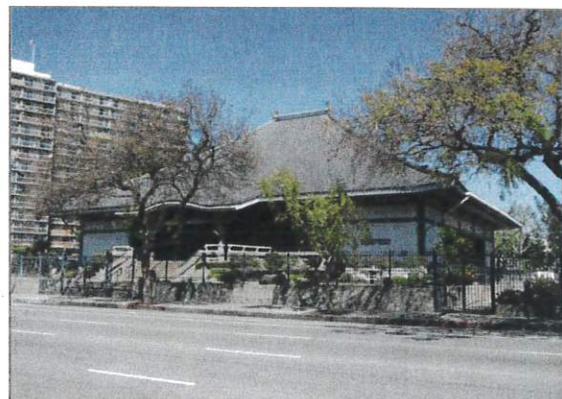


Name: Koyasan Buddhist Temple

Address: 342 E. First St.

Architect: Mieki Hayano

Date: 1940



Name: Higashi Honganji Buddhist Temple

Address: 505 E. Third St.

Architect: Kajima and Associates

Date: 1976



Name: Chinese Congregational Church

Address: 734 E. Ninth Pl.

Architect: Quintin and Westberg

Date: 1924

Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Cultural Development and Institutions, 1850-1980

Theme: Religious Property Types, 1850-1980

Historically, small churches abounded in Downtown Los Angeles at a time when much of the area around the central business district was developed with residential neighborhoods. Over time nearly all vestiges of residential development patterns, including churches, have been eliminated as land in Downtown was increasingly turned over for commercial and industrial use. However, the Survey Area includes two examples of religious buildings that were constructed in the early decades of the twentieth century and were attended by those who lived nearby. Both were evaluated using this Context/Theme combination. Included is a 1920s Methodist church (left) in what is now known as Skid Row, and a 1930s Christian Science Reading Room (right) that was associated with an adjacent church building that has since been demolished. Both are rare remaining examples of religious buildings in this area of the city.



Name: First Free Methodist Church

Address: 606 E. Sixth St.

Architect: F.A. Brown

Date: 1920



Name: Third Church of Christ, Scientist Reading Room

Address: 730 S. Hope St.

Architect: G.A. Howard

Date: 1937

Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Military Institutions and Activities, 1850-1980

Theme: Air Raid Sirens and Civil Defense, 1939-1960

During World War II, hundreds of air raid sirens were installed throughout Los Angeles for the purpose of civil defense and were designed to provide audible warnings of impending air assaults. The system was shut off at the end of World War II, but was reactivated in the 1950s following the onset of the Cold War. Twelve examples of air raid sirens are located in the Central City area and were evaluated under this Context/Theme combination. Two of the four federal air raid siren models – “wire spool” and “flattened birdhouse” – are represented in the CPA; all of the air raid sirens identified are installed on freestanding support poles.



Name: Air Raid Siren No. 93 (Wire Spool)
Location: Olive St., between First St. and Second St.
Date: circa 1940



Name: Air Raid Siren No. 9 (Wire Spool)
Location: Main St. and Winston St.
Date: circa 1940



Name: Air Raid Siren No. 8 (Wire Spool)
Location: Spring St. and Temple St.
Date: circa 1940



Name: Air Raid Siren No. 189 (Flattened Birdhouse)
Location: Eighth St. and McGarry Ave.
Date: circa 1940

Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Government Infrastructure and Services, 1850-1980

Theme: Public Works, 1900-1980

Sub-Theme: Street Lights and the Bureau of Street Lighting, 1900-1980

Many of the streetlights in Downtown Los Angeles date to the early decades of the twentieth century and are notable for their ornamental attributes. Streetlights of this vintage can be found throughout Downtown, particularly along corridors in the central business district. This Context/ Theme combination was used to evaluate intact, cohesive concentrations of streetlights in the Survey Area. Many feature a double-lantern design (top row) and were officially known as the “UM-1920” variety. Hundreds of UM-1920 streetlights were installed on many Downtown streets in the mid-1920s. Those on North Spring Street (bottom left) feature extended support poles that historically supported wires that supplied power to streetcars, and others, such as those on Olympic Boulevard (bottom right), were custom-designed for a particular street.



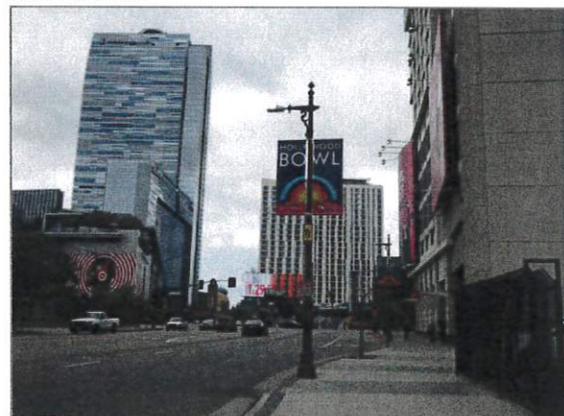
Name: Fourth Street Streetlights
Location: Fourth St., between Hill St. and Main St.
Date: c. 1925



Name: Sixth Street Streetlights
Location: Sixth St., between Flower St. and Main St.
Date: c. 1925



Name: North Spring Street Streetlights
Location: Spring St. between First St. and Chavez Ave.
Date: c. 1925



Name: Olympic Boulevard Streetlights
Location: Olympic Bl., between SR-110 and Flower St.
Date: c. 1930

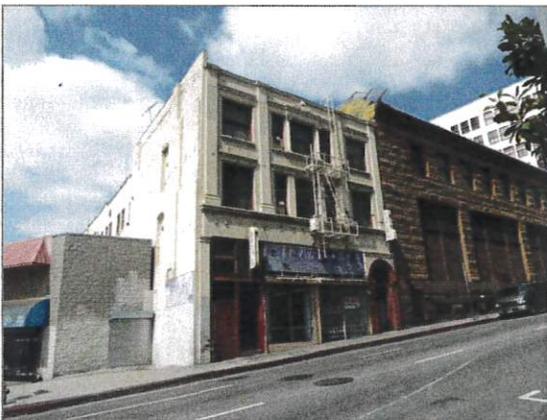
Context: Public and Private Institutional Development, 1850-1980

Sub-Context: Civil Rights Movement – Ethnic and Gender Equality, 1942-1980

Theme: Gay Civil Rights Movement, 1942-1965

Sub-Theme: Important Events and Institutions in the Gay Civil Rights Movement, 1942-1965

Downtown Los Angeles is home to some of the oldest known resources associated with the city's lesbian, gay, bisexual, and transgender (LGBT) community. Significant LGBT resources identified in the survey include a Turkish bathhouse from 1906 (top left) that remains in operation and is notable as the oldest operating gay bathhouse in Los Angeles; the Merced Theatre (top right), where masked balls at the turn of the twentieth century provided gays and lesbians with a safe space to engage in nonconforming sexual behavior; and buildings that were once the site of influential gay bars from the 1940s and '50s (bottom row). While these bars are no longer in business, the buildings in which they were housed remain extant.



Name: Palace Turkish Baths/Hotel Venice

Address: 132 E. Fourth St.

Architect: Fred R. Dorn

Date: 1906



Name: Merced Theatre

Address: 420 N. Main St.

Architect: Ezra P. Kysor

Date: 1870



Name: The Crown Jewel (site of)

Address: 425 W. Eighth St.

Date: 1910



Name: Gayaway Café (site of)

Address: 514 S. Main St.

Date: 1906

Context: Architecture and Engineering, 1850-1980

Theme: Late 19th and Early 20th Century Architecture, 1865-1950

Sub-Theme: Beaux Arts Classicism, 1895-1930

Many of the early twentieth century buildings in the Survey Area are designed in the formal and ornamented Beaux Arts style. Taking its name from the *École de Beaux Arts* in Paris, the style was commonly applied to commercial and civic buildings from this era and projected grandeur, symmetry, and order. Its popularity coincided with the rise of the City Beautiful Movement, a city planning paradigm that aimed to improve urban settings through monumental architecture and civic beautification. This Context/Theme combination was used to evaluate commercial and institutional buildings that are excellent examples of the Beaux Arts style. Common features include tripartite vertical organization with a clearly delineated base, shaft, and capital; heavy cornices; balanced facades; and formally-scaled architectural details that draw upon Classicism.



Name: Marsh Strong Building

Address: 112 W. Ninth St.

Architect: Fred R. Dorn

Date: 1913

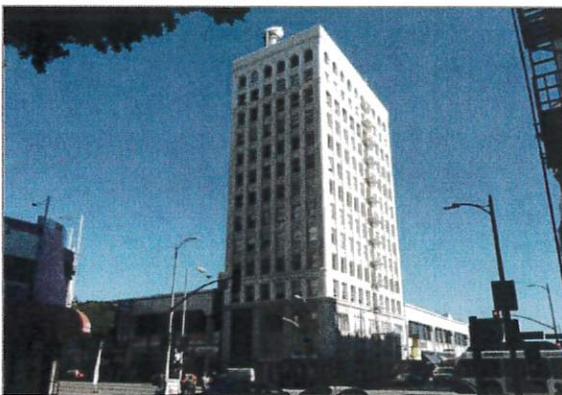


Name: Los Angeles Railway Building

Address: 1060 S. Broadway

Architect: Noerenberg and Johnson

Date: 1922



Name: Builders Exchange Building

Address: 656 S. Los Angeles St.

Architect: Walker and Eisen

Date: 1925



Name: Lane Mortgage Building

Address: 200 W. Eighth St.

Architect: Loy L. Smith

Date: 1922

Context: Architecture and Engineering, 1850-1980

Theme: Mediterranean and Indigenous Revival Architecture, 1887-1952

Sub-Theme: Renaissance Revival, 1895-1935

Similar in composition and appearance to the Beaux Arts style, the Renaissance Revival style was also a common choice for early twentieth century commercial and civic buildings. Buildings designed in the Renaissance Revival style are also characterized by their attention to symmetry, order, and incorporation of Classical style details; however, they are distinguished from their Beaux Arts counterparts by details such as arches, engaged columns, voussoirs, and other decorative elements that more deliberately reference Italian Renaissance motifs. This Context/ Theme combination was used to evaluate buildings that are excellent examples of the Renaissance Revival style. Almost all were designed by noted architects.



Name: Pacific Finance Building

Address: 510 W. Sixth St.

Architect: Dodd and Richards

Date: 1921



Name: Sun Drug Building

Address: 706 S. Hill St.

Architect: Curlett and Beelman

Date: 1922



Name: Ritz Hotel/Milner Hotel

Address: 813 S. Flower St.

Architect: Curlett and Beelman

Date: 1923



Name: Western Pacific Building

Address: 1031 S. Broadway

Architect: Walker and Eisen

Date: 1925

Context: Architecture and Engineering, 1850-1980

Theme: Period Revival, 1919-1950

Sub-Theme: Late Gothic Revival, 1919-1939

Rooted in the architecture of Medieval Britain and France, the Late Gothic Revival style became popular in Los Angeles in the early twentieth century. The style's visual references to old-world architecture rendered it a popular choice for ecclesiastical and other institutional buildings. This Context/Theme combination was used to evaluate buildings in the Survey Area that are excellent examples of the Late Gothic Revival style. Of note were several industrial loft buildings that were designed in the 1920s by architect W. Douglas Lee and builder Florence Casler, whose collaboration produced some of the city's most architecturally distinguished industrial buildings. Casler is notable for breaking down gender barriers in the male-dominated building industry.



Name: Elias-Katz Shoe Factory

Address: 442 S. San Pedro St.

Architect: W. Douglas Lee, Florence C. Casler (builder)

Date: 1927



Name: Allied Crafts Building

Address: 401 E. Pico Blvd.

Architect: W. Douglas Lee, Florence C. Casler (builder)

Date: 1926



Name: Graphic Arts Building

Address: 415 E. Pico Blvd.

Architect: W. Douglas Lee, Florence C. Casler (builder)

Date: 1924



Name: Bendix Building

Address: 1206 S. Maple Ave.

Architect: W. Douglas Lee, Florence C. Casler (builder)

Date: 1929

Context: Architecture and Engineering, 1850-1980

Sub-Context: L.A. Modernism, 1919-1980

Theme: Art Deco, 1926-1939

Downtown Los Angeles features a relatively large collection of buildings designed in the Art Deco style. Art Deco, which made its official debut in Paris in 1925, reflected the optimism of the 1920s by introducing an aesthetic defined by its verticality and sharp, geometric forms. The style was more forward-reaching than the Beaux Arts and Period Revival styles, which looked to past architectural traditions for inspiration. The onset of the Great Depression meant that the opulent Art Deco style was relatively short-lived. This Context/Theme combination was used to evaluate excellent examples of the Art Deco style. The style was adapted to a variety of property types including commercial (top row), institutional (bottom left), and industrial (bottom right) buildings.



Name: Harris and Frank Building

Address: 635 S. Hill St.

Architect: Curlett and Beelman

Date: 1925



Name: Security Title Insurance Building

Address: 540 W. Sixth St.

Architect: Walker and Eisen

Date: 1929



Name: Southern California Telephone Co. Building

Address: 716 S. Olive St.

Architect: Morgan and Walls

Date: 1908; circa 1933 (remodel)



Name: W.M. Gottschalk and Son

Address: 1012 S. Santee St.

Architect: Russell Collins

Date: 1929

Context: Architecture and Engineering, 1850-1980

Sub-Context: L.A. Modernism, 1919-1980

Theme: Corporate International, 1946-1976

Areas of Downtown Los Angeles that experienced substantial redevelopment after World War II feature many buildings designed in the Corporate International style. The style, which emerged as an adaption of International style architecture that had helped propel Modernism into the public eye, is characterized by its rejection of historicist idioms and embrace of an aesthetic that incorporated modern materials, forms, and technologies. This Context/Theme combination was used to evaluate excellent, iconic examples of Corporate International style office towers. These buildings clearly convey the philosophy underpinning the International style as applied to a dense urban setting. Several were also evaluated under the Commercial Development context for their association with patterns of corporate development and identity after World War II.



Name: Union Bank Plaza

Address: 445 S. Figueroa St.

Architect: A.C. Martin and Associates

Date: 1966



Name: United California Bank Building/Aon Center

Address: 707 W. Wilshire Blvd.

Architect: Charles Luckman Associates

Date: 1973



Name: Crocker-Citizens Plaza

Address: 611 W. Sixth St.

Architect: William L. Pereira and Associates

Date: 1967



Name: Security Pacific Plaza/Bank of America Plaza

Address: 333 S. Hope St.

Architect: A.C. Martin and Associates

Date: 1974

Context: Architecture and Engineering, 1850-1980

Sub-Context: L.A. Modernism, 1919-1980

Theme: Late Modernism, 1966-1980

Many of the more contemporary buildings in Downtown Los Angeles can be classified as “Late Modern,” a broad term that is used to describe the evolution of Modernism from about the mid-1960s onward. This Context/Theme combination was used to evaluate properties that are excellent examples of various iterations of Late Modernism. Included are several buildings that feature sculptural qualities and glass skins (top row); heavy, concrete buildings that are characteristic of Brutalism (bottom left); and an iconic performing arts venue that exhibits the fragmentation and freedom of form associated with the Deconstructivist movement (bottom right).



Name: Bonaventure Hotel

Address: 404 S. Figueroa St.

Architect: John Portman and Associates

Date: 1976



Name: Pacific Financial Center

Address: 808 W. Sixth St.

Architect: William L. Pereira and Associates

Date: 1973



Name: Japanese American Cultural & Comm. Center

Address: 244 S. San Pedro St.

Architect: Kazumi Adachi, et al.

Date: 1978



Name: Walt Disney Concert Hall

Address: 111 S. Grand Ave.

Architect: Frank O. Gehry

Date: 2003

Context: Entertainment Industry, 1908-1980

Theme: Commercial Properties Associated with the Entertainment Industry, 1909-1980

While the epicenter of Los Angeles' entertainment industry is in the Hollywood area, some entertainment-related uses were also located Downtown. This Context/Theme combination was used to evaluate four examples of commercial properties that are associated with the entertainment industry. Examples include a motion picture theater (top left) that was built in 1919 for the Pantages circuit and was later occupied by Warner Bros.; two smaller motion picture theaters (top right and bottom left) located on Eighth and Main streets, respectively; and a commercial building that served as a "prop shop" for the Joseph Basch Company, which rented period furniture and other items to motion picture studios. The Pantages Theater was also evaluated under the Architecture context as an excellent example of the Beaux Arts style.



Name: Pantages Theatre/Warner Bros. Theatre
Address: 411 W. Seventh St.
Architect: B. Marcus Priteca
Date: 1919



Name: Olympic Theatre/Bard's 8th Street Theatre
Address: 313 W. Eighth St.
Architect: Lewis A. Smith
Date: 1927



Name: Regent Theatre
Address: 448 S. Main St.
Architect: A. Lawrence Valk; Stiles Clements (remodel)
Date: 1914



Name: Joseph Basch Company Showroom
Address: 1031 S. Hill St.
Architect: Walker and Eisen
Date: 1920

Context: Industrial Development, 1850-1980

Theme: Agricultural Roots, 1850-1965

Sub-Theme: From Farm to Market, 1900-1960

Agriculture was one of the first linchpins of Los Angeles' economy and accounted for much of its early industrial development. Industrial properties that played an important supporting role in the distribution of agricultural goods tended to concentrate near the railroad terminals along Alameda Street, to the east of the central business district. This Context/Theme combination was used to evaluate examples of early twentieth century industrial buildings that convey early patterns of agriculture-oriented industrial development in the area. Included is a cold storage warehouse from 1905 (left), which was built to store produce and other raw food items; and a produce brokerage building (right), also from 1905, which housed office and warehouse space and was an important administration center within the local produce trade. The produce brokerage building was also evaluated for its association with the Chinese American community; a portion of the building was occupied by the Market and Produce Bank, which catered to Chinese American produce merchants and was one of few banks that accommodated people of Chinese descent in an era when Asian Americans were confronted by rampant discrimination.



Name: Los Angeles Ice and Cold Storage Company
Address: 715 E. Fourth St.
Architect: Eisen and Wyman
Date: 1905



Name: Produce Exchange Building
Address: 333 S. Central Ave.
Date: 1905

Context: Industrial Development, 1850-1980

Sub-Context: Manufacturing for the Masses, 1883-1980

Theme: Garments and Textiles, 1896-1980

Since the early twentieth century, Los Angeles has been one the nation’s foremost producers of garment and textiles, surpassed only by New York City in terms of volume. Garment factories concentrated to the south and east of the central business district and tended to occupy tall, industrial loft buildings that supported the industry’s working environmental and organizational structure. Several excellent, intact examples of garment factories were evaluated using this Context/Theme combination. Most are vernacular buildings that lack articulation, but others, including the Cooper Building (bottom right), are architecturally distinguished and were also evaluated as excellent examples of their respective architectural style.



Name: McComas Building
Address: 120 E. Eighth St.
Architect: John M. Cooper
Date: 1923



Description: Brownstein-Louis Company
Address: 1214 S. Stanford Ave.
Builder: John M. Cooper
Date: 1930



Name: Calo Building
Address: 443 S. San Pedro St.
Architect: W. Douglas Lee
Date: 1923



Name: Cooper Building
Address: 860 S. Los Angeles St.
Architect: Curlett and Beelman
Date: 1924

Context: Industrial Development, 1850-1980

Theme: Industrial Design and Engineering, 1887-1965

This Context/Theme combination was used to evaluate properties that are excellent examples of a particular variety of industrial design. Industrial lofts and daylight factories are the two most common industrial property types in Downtown Los Angeles. Industrial lofts (top row) are characterized by their vertical orientation, which was an attempt to maximize the amount of usable floor space on relatively compact urban lots. Daylight factories (bottom row) feature expansive bands of industrial sash windows, distinctive roof forms, and other innovative design features that aim to maximize the amount of natural light that enters into the building. Most buildings evaluated under this Context/Theme were designed by master architects, who were known for other types of projects but also incorporated industrial design into their repertoire.



Name: Continental Pacific Building
Address: 1013 S. Los Angeles St.
Architect: B. Marcus Priteca
Date: 1925



Name: Walter Building
Address: 808 S. Wall St.
Architect: Russell and Ellison
Date: 1924



Name: Western Electric Company
Address: 1757 E. Olympic Blvd.
Architect: Morgan, Walls and Clements
Date: 1925

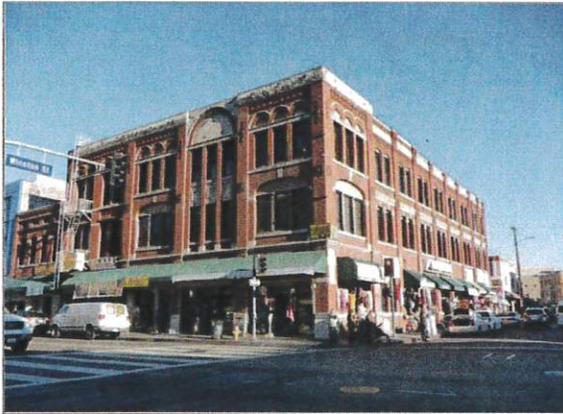


Name: Los Angeles Rubber Stamp Company
Address: 1500 S. Los Angeles St.
Architect: Walker and Eisen
Date: 1924

Context: Other Context, 1850-1980

Theme: Events or Series of Events, 1850-1980

This Context/Theme was used to evaluate industrial properties that are significant for their association with Los Angeles' labor history. In 1901, the predominantly-female workforce of the Excelsior Steam Laundry (left) participated in a laundry workers' strike that called attention to poor working conditions in the city's seven major laundry companies. Strikers called for a closed shop agreement, a ten-hour work day, and equal pay for women and men. The laundry strike set the stage for future labor disputes that would roil Los Angeles in subsequent years. The second resource associated with labor (bottom right) historically served as the headquarters of the International Ladies Garment Workers' Union. In the 1930s, dressmakers belonging to the union went on strike, which significantly influenced the treatment of women employed in the garment and textile industries. This building was the location at which union members were registered, organized into shop groups, and issued identification cards which provided them with access to meals, groceries, and a weekly cash allowance.



Name: Excelsior Steam Laundry

Address: 424 S. Los Angeles St.

Date: 1893



Name: International Ladies Garment Workers' Union

Address: 1108 S. Los Angeles St.

Date: 1923

Context: Other Context, 1850-1980

Theme: Events or Series of Events, 1850-1980

This Context/Theme combination was also used to evaluate the Los Angeles Civic Center Historic District. Developed between 1925 and 1972, the monumental civic buildings and associated site features comprising the district convey patterns of development associated with a Civic Center Master Plan for Los Angeles that was conceived in 1927 and amended in 1947. Aside from the earliest buildings in the civic center, buildings within the district are generally designed in the Corporate International style. The district was previously identified as eligible for the National Register and California Register through the Section 106 and California Environmental Quality Act (CEQA) review processes, respectively. The findings of this previous determination were recorded as part of SurveyLA.



Description: Civic Center Historic District Contributor
Address: (Hall of Justice)
Architect: Allied Architects Association
Date: 1925



Description: Civic Center Historic District Contributor
Address: 150 N. Los Angeles St.(Parker Center)
Architect: Welton Becket and Associates
Date: 1955



Description: Civic Center Historic District Contributor
Address: 135 N Grand Ave (Dorothy Chandler Pavilion)
Architect: Welton Becket and Associates



Description: Civic Center Historic District Contributor
Address: 320 W. Temple St. (Hall of Records)
Architect: Neutra and Alexander

Date: 1964

Date: 1962

Context: Other Context, 1850-1980

Theme: Events or Series of Events, 1850-1980

This Context/Theme was also used to evaluate two cohesive examples of commercial districts dating to this period, one on Seventh Street and the other on Hill Street. The central business district of Los Angeles took shape between the turn of the twentieth century and the early 1930s, when many new commercial buildings were constructed along Downtown's major streets. These arteries evolved into bustling commercial corridors that were flanked by myriad commercial uses including department stores, retail shops, theaters, banks and financial institutions, eateries, and offices. Each district was also identified as an excellent concentration of early twentieth century – and particularly Beaux Arts – commercial architecture. Since these districts contain some of the best examples of commercial architecture in Los Angeles, many contributing buildings were also evaluated as individually eligible resources. Several are already listed in the National Register, California Register, and/or as City Historic-Cultural Monuments.



District: Hill Street Commercial Historic District
Period of Significance: 1906-1934



District: Seventh Street Commercial Historic District
Period of Significance: 1906-1928



Description: Hill Street District Contributor
Address: 638 S. Hill St. (Bullocks Annex)
Date: 1928



Description: Hill Street District Contributor
Address: 701 S. Hill St. (Foreman and Clark Building)
Date: 1928



Description: Seventh Street District Contributor
Address: 700 S. Grand Ave. (Brockman Building)
Date: 1912



Description: Seventh Street District Contributor
Address: 515 W. Seventh St. (Brock and Company)
Date: 1922



Description: Seventh Street District Contributor
Address: 431 W. Seventh St. (L.A. Athletic Club)
Date: 1911



Description: Seventh Street District Contributor
Address: 505 W. Seventh St. (Bank of Italy)
Date: 1923



Description: Seventh Street District Contributor
Address: 215 W. Seventh St. (Union Oil Building)
Date: 1911

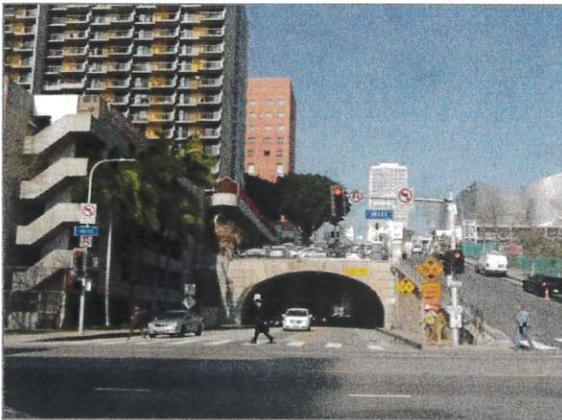


Description: Seventh Street District Contributor
Address: 701 S. Broadway (State Theatre)
Date: 1924

Context: Other Context, 1850-1980

Theme: Design/Construction, 1850-1980

This Context/Theme was used to evaluate examples of infrastructure in the Survey Area that are significant for their physical design. Examples include a concrete tunnel (top left) that was constructed in the 1920s to alleviate congestion in the central business district, and a network of elevated pedestrian corridors, or “pedways,” (bottom row), which were part of a visionary urban design scheme for Bunker Hill and provide direct pedestrian links between key buildings and sites in the area. The pedway system was named for Calvin S. Hamilton, who served as the city planning director of Los Angeles and oversaw the system’s initial construction.



Name: Second Street Tunnel
Location: Second St., between Hill St. and Figueroa St.
Date: 1924



Name: Calvin S. Hamilton Pedway
Location: Bunker Hill
Date: 1974

Selected Bibliography

Books and other published material:

- Bancroft, Hubert Howe, et al., *History of California: 1841-1845*. San Francisco: The History Company, 1886.
- Bolton, H. Eugene. *Fray Juan Crespi: Missionary Explorer on the Pacific Coast, 1769-1774*. Berkeley: University of California Press, 1927.
- California Place Names: A Geographical Dictionary*. Berkeley: University of California Press, 1949.
- City of Los Angeles. *Four Square Leagues: Los Angeles Two Hundred Years Later*. n.d.
- Community Redevelopment Agency of the City of Los Angeles. "Bunker Hill Redevelopment Project Area Implementation Plan: FY 2010-Jan. 2012." Dec. 17, 2009.
- Creason, Glen. "CityDig: Los Angeles Was Once a Small Adobe Backwater." *Los Angeles Magazine*. Jul. 20, 2015.
- Epting, Charles. *Victorian Los Angeles: From Pio Pico to Angels Flight*. Charleston: Arcadia Publishing, 2015.
- Estrada, William David. *The Los Angeles Plaza: Sacred and Contested Space*. Austin: University Of Texas Press, 2008.
- Faragher, John Mack. *Eternity Street: Violence and Justice in Frontier Los Angeles*. New York: W.W. Norton and Company, 2016.
- Fickle, Tara. "A History of the Los Angeles City Market, 1930-1950." *Gum Saan Journal* 32.1 (2010).
- Gebhard, David, and Robert Winter. *An Architectural Guidebook to Los Angeles*. Salt Lake City: Gibbs Smith, 2004.
- Geiger, Maynard. "The Building of Mission San Gabriel: 1771-1828." *Southern California Quarterly* 50.1 (March 1968): 33-42.
- Kipen, David. *Los Angeles in the 1930s: the WPA Guide to the City of Angels*. Berkeley: University of California Press, 2011.

- Krythe, Maymie R. "First Hotel of Old Los Angeles: 'The Romantic Bella Union.'" *The Historical Society of Southern California Quarterly* 33.2 (June 1951): 147-179.
- Los Angeles Area Chamber of Commerce. "History of Downtown Los Angeles' 'Skid Row.'" n.d.
- Los Angeles Conservancy. "The Arts District: History and Architecture in Downtown L.A." Nov. 10, 2013.
- Los Angeles Conservancy. "Strolling on 7th Street: Downtown's Historic Thoroughfare." Nov. 7, 2010.
- Mason, William M. *Los Angeles Under the Spanish Flag*. Burbank: Southern California Genealogical Society, Inc., 2004.
- McWilliams, Carey. *Southern California: An Island on the Land*. Salt Lake City: Peregrine Smith, 1946.
- Poole, Jean Bruce, and Tevvy Ball. *El Pueblo: The Historic Heart of Los Angeles*. Los Angeles: Getty Conservation Institute, 2002.
- Robinson, W.W., et al., "Story of Ord's Survey: As Disclosed by the Los Angeles Archives." *The Quarterly: Historical Society of Southern California* 19.3 (Sept.-Dec. 1937): 121-131.
- Romero, Mary, et al. *Challenging Fronteras: Structuring Latina and Latino Lives in the U.S.* New York: Routledge, 2014.
- Roseman, Curtis C., et al., *The Historic Core of Los Angeles*. Charleston: Arcadia Publishing, 2004.
- Rosenthal, Nicolas G. *Reimagining Indian Country: Native American Migration and Identity in Twentieth Century Los Angeles*. Chapel Hill: University of North Carolina Press, 2012.
- "Site Context for the LA Plaza de Cultura y Artes Project, Los Angeles, California." Prepared for the County of Los Angeles by SWCA Environmental Consultants, Dec. 2012.
- Stargel, Corey and Sarah. *Early Downtown Los Angeles*. Charleston: Arcadia Publishing, 2009.
- Starr, Kevin. *Material Dreams: Southern California through the 1920s*. New York: Oxford University Press, 1990.
- "SuveyLA Draft Chinese American Historic Context Statement." Sept. 2013.

“SurveyLA Draft Historic Context Statement, Industrial Development.” Aug. 26, 2011.

“SurveyLA Latino Historic Context Statement.” Sept. 2015.

“The Height of Buildings.” *Southwest Contractor and Manufacturer* 6.1 (Nov. 1, 1910): 17.

Other repositories of maps, photographs, periodicals, and other materials:

California Military Museum. “The Two Forts of Fort Hill.” Accessed May 2016,
<http://www.militarymuseum.org/FtMoore2.html>.

City of Los Angeles. “Central City Community Plan.” Department of City Planning, 2003.

City of Los Angeles. “El Pueblo de Los Angeles Historical Monument.” Accessed May 2016,
<http://www.elpueblo.lacity.org/index.htm>.

City of Los Angeles Office of Historic Resources. “Adaptive Reuse Ordinance.” Accessed May 2016, <http://preservation.lacity.org/incentives/adaptive-reuse-ordinance>.

Community Redevelopment Agency of the City of Los Angeles. “Bunker Hill Urban Renewal Project: About the Project Area.” Accessed May 2016,

Digital Sanborn Maps 1867-1970, *Sanborn Fire Insurance Maps*, accessed May 2016.
<http://sanborn.umi.com.ezproxy.lapl.org/>.

Historic American Building Survey Documentation for the Garnier Block. HABS No. CA-2799. n.d.

“Historical Resident Population, City and County of Los Angeles.” Los Angeles Almanac.
Accessed May 2016, <http://www.laalmanac.com/population/po02.htm>.

Los Angeles County Department of Public Works. Tract Maps, accessed May 2016,
<http://dpw.lacounty.gov/sur/surveyrecord/tractMain.cfm>.

Los Angeles Public Library, *California Index*, accessed May 2016.
<http://www.lapl.org/collections-resources/visual-collections/california-index>.

Los Angeles Public Library Photographic Collection, *Historic Photographs*, accessed May 2016.
http://photos.lapl.org/carlweb/jsp/photosearch_pageADV.jsp.

Los Angeles Times. “Mapping L.A.,” accessed May 2016. <http://projects.latimes.com/mapping-la/neighborhoods>.

National Park Service. "Little Tokyo Historic District." Accessed May 2016,
[https://www.nps.gov/nr/travel/Asian American and Pacific Islander Heritage/Little-Tokyo-Historic-District.htm](https://www.nps.gov/nr/travel/Asian_American_and_Pacific_Islander_Heritage/Little-Tokyo-Historic-District.htm).

National Register of Historic Places Nomination Form. "Spring Street Financial District."
Prepared Jul. 1977.

ProQuest Newsstand, *Historical Los Angeles Times*, accessed Sept. 2015 – May 2016.
<http://search.proquest.com.ezproxy.lapl.org/>.

UCLA Digital Collections, *Los Angeles Times Photograph Collection*, accessed 2016.
<http://digital2.library.ucla.edu/>.

USC Digital Library, *California Historical Society*, accessed 2016.
<http://digitalibrary.usc.edu/search/controller/index.htm>.

USC Digital Library, *Whittington Photographs*, accessed 2016.
<http://digitalibrary.usc.edu/search/controller/index.htm>.

U.S. General Services Administration. "U.S. Courthouse, Los Angeles, CA." Accessed May 2016,
<http://www.gsa.gov/portal/ext/html/site/hb/category/25431/actionParameter/exploreByBuilding/buildingId/705>

Water and Power Associates. "Early Los Angeles Historical Buildings (1800s)." Accessed May 2016,
[http://waterandpower.org/museum/Early LA Buildings%20%281800s%29.html](http://waterandpower.org/museum/Early_LA_Buildings%20%281800s%29.html).



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: SEP 26 2023

Case No. VTT-74876-CN-1A

Council District: 14 – de León

CEQA: ENV-2017-506-EIR (SCH. No. 2019050010)

Plan Area: Central City

Related Cases: CPC-2017-505-TDR-ZV-SPPA-DD-SPR;
ZA-2021-7053-ZAI-1A

Project Site: 754 South Hope Street; 609 – 625 West 8th Street

Applicant: MFA 8th Grand and Hope LLC
Representative: Edgar Khalatian, Mayer Brown LLP

Appellants:

1. Richard Becher, Digital Realty
2. Supporters Alliance for Environmental Responsibility (SAFER)
Representative: Amalia Bowley Fuentes, Lozeau Drury LLP
3. CREED LA c/o Aidan P. Marshall
Representative: Aidan P. Marshall, Adams, Broadwell, Joseph & Cardozo

At its meeting of **July 13, 2023**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following Project:

Merger and re-subdivision of three lots into one ground lot and nine airspace lots for residential and commercial condominium purposes, and above and below grade parking. A haul route for the export of approximately 89,750 cubic yards of soil is included.

1. **Found**, pursuant to Section 21081.6 of the Public Resources Code (PRC), that the City Planning Commission reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft EIR, ENV-2017-506-EIR (State Clearinghouse No. 2019050010), dated November 18, 2021, and the Final EIR dated January 2023 (8th, Grand and Hope Project EIR), as well as the whole of the administrative record;

CERTIFIED the following:

- a. The 8th, Grand and Hope Project EIR has been completed in compliance with the California Environmental Quality Act;
- b. The 8th, Grand and Hope Project EIR was presented to the City Planning Commission as a decision-making body of the lead agency, and
- c. The 8th, Grand and Hope Project EIR reflects the independent judgment and analysis of the lead agency.

ADOPTED the following:

- a. The related and prepared 8th, Grand and Hope Project EIR Environmental Findings;
- b. The Statement of Overriding Considerations; and
- c. The Mitigation Monitoring Program prepared for the 8th, Grand and Hope Project EIR;

2. **Denied** the appeal in part and **granted** the appeal in part, and **sustained** the decision of the Advisory Agency dated May 26, 2023;

- 3. **Approved**, pursuant to Sections 17.03 and 17.15 of the Los Angeles Municipal Code (LAMC), a Vesting Tentative Tract Map No. 74876-CN for the merger and re-subdivision of three lots into one ground lot and nine airspace lots for residential and commercial condominium purposes, and above and below grade parking, as shown on map stamp-dated February 14, 2022, and a Haul Route for the export of approximately 89,750 cubic yards of soil;
- 4. **Adopted** the attached Modified Conditions of Approval; and
- 5. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Millman
 Second: Choe
 Ayes: Cabildo, Lawshe, Mack, Noonan, Zamora
 Recuse: Gold
 Absent: Leung

Vote: 7 – 0 – 1



Cecilia Lamas, Commission Executive Assistant II
 Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is further appealable to the Los Angeles City Council within 10 days after the mailing date of this determination letter. Any appeal not filed within the 10-day period shall not be considered by the Council and the decision of the City Planning Commission will become final and effective upon the close of the 10-day appeal period. All appeals shall be filed on forms provided at the Planning Department’s Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; or 6262 Van Nuys Boulevard, Suite 251, Van Nuys.

FINAL APPEAL DATE: OCT 06 2023

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City’s decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Modified Conditions of Approval, Amended Findings, Appeal Filing Procedures

- c: Milena Zasadzien, Principal City Planner
- Alan Como, Senior City Planner
- Polonia Majas, City Planning Associate

CONDITIONS OF APPROVAL

(As Modified by the City Planning Commission at its meeting on July 13, 2023)

The final map must be recorded within 36 months of this approval, unless the subdivider requests a time extension and it is granted before the end of such period, if applicable. Time Extensions may not always be granted.

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

This project is located within the Downtown Design Guide Project Area. Per Ordinance 181,557, every project within this project area must comply with the Downtown Design Guide standards and guidelines. City Planning Department shall make the final determination on the proposed limited height easement, mergers and encroachments within the sidewalk easements for consistency with the Downtown Street Design Guide: Urban Design Standards and Guidelines.

1. Along 8th Street adjoining the subdivision, a 5-foot-wide sidewalk easement will be provided. Above easement shall be limited to a depth of 3 feet below finished sidewalk grade and unlimited height above finished sidewalk surface. This easement shall be shown on the final map.
2. Along Hope Street adjoining the subdivision, a 3-foot-wide strip of land will be dedicated to complete a 43-foot wide half right-of-way in accordance with the Modified 2-Way Avenue II of the Downtown Street Standards and a 20-foot radius property line return or a 15-foot by 15-foot corner cut be dedicated at the intersection with 8th Street beginning at 3 feet below finished sidewalk grade and 25 feet above finished sidewalk surface.
3. Along Hope Street adjoining the subdivision, an additional 3-foot-wide average width sidewalk easement will be provided in accordance with the Modified 2-way Avenue II of the Downtown Street Standards and an additional 20-foot radius easement line return or a 15-foot by 15-foot corner cut easement be provided at the intersection with 8th Street. Above easement shall be limited to a depth of 3 feet below finished sidewalk grade and 25 feet above finished sidewalk surface. This easement shall be shown on the final map.
4. At the intersection of Grand Avenue and 8th Street adjoining the subdivision, a 20-foot radius property line return or 15-foot by 15-foot corner cut will be dedicated and shall be limited to a depth of 2 feet below finished sidewalk grade and 25 feet above finished sidewalk surface.
5. Along Grand Avenue adjoining the subdivision, a 7-foot wide average width sidewalk easement will be provided in accordance with the Modified 1-Way Avenue II of the Downtown Street Standards and 20-foot radius easement line return or 15-foot by 15-foot corner cut easement be provided at the intersection with 8th Street. Above easement shall be limited to a depth of 2 feet below finished sidewalk grade and 25 feet above finished sidewalk surface. This easement shall be shown on the final map.
6. LADOT, in a letter to the City Engineer, shall determine that the proposed merger area of 8th Street between Hope Street and Grand Avenue as shown on the Revised Map is not necessary for current and future Public Street use.

7. The Department of City Planning, in a letter to the City Engineer prior to the recordation of the final map, will also determine that the proposed merger area of 8th Street between Hope Street and Grand Avenue as shown on the Revised Map is consistent with all applicable General Plan Elements of Highway and Circulation Elements for LA Mobility Plan and the Downtown Design Guide: Urban Design Standards and Guidelines.
8. If LADOT and Department of City Planning have no objections, the portion of 8th Street between Hope Street and Grand Avenue, as shown on the Revised Map and excluding the required dedication for the property line return or corner cut at the intersection with Hope Street and Grand Avenue, will be permitted to be merged with the remainder of the tract map pursuant to Section 66499.20.2 of the State Government Code, and in addition, the following conditions be executed by the applicant and administered by the City Engineer:
 - a. That consents to the area being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
 - b. That satisfactory arrangements be made with all utility agencies, cable companies and franchises maintaining existing facilities within the area being merged.

Note: The Advisory Agency hereby finds that the proposed areas to be merged are unnecessary for present or prospective public purposes and all owners of the interest in the real property within the subdivision have or will have consented to the merger prior to the recordation of the final map.

9. If the merger of the portion of 8th Street between Hope Street and Grand Avenue, as shown on the Revised Map is not approved, the applicant shall submit a revised map not showing the proposed merger satisfactory to the Department of City Planning and the City Engineer.
10. A revised map be submitted satisfactory to the City Planning Department and the City Engineer prior to the submittal of the final map delineating all right-of-way dimensions, approved dedications or easements, and property line and easement line returns adjoining the subdivision. This map will be used for final map checking purposes.
11. All the proposed tract map boundary lines will be properly established in accordance with Section 17.07.D of the Los Angeles Municipal code prior to the recordation of the final map satisfactory to the City Engineer (Survey Division).
12. The subdivider will make a request to BOE Central District to determine the capacity of existing sewers in this area.
13. Satisfactory arrangements will be made with the Los Angeles County Department of Public Works prior to recordation of the final map for realignment, replacement and or relocation of the existing Los Angeles County drainage system within the 8th Street merger area including any necessary new drainage easements to be shown on the final map.
14. Satisfactory arrangements will be made with the Los Angeles County Department of Public Works prior to recordation of the final map for any necessary permits with respect to discharge into and reconstruction of their existing storm drain catch basin.

15. A set of drawings for airspace lots will be submitted to the City engineer showing the following:
 - a. Plan view at different elevations.
 - b. Isometric views.
 - c. Elevation views.
 - d. Section cuts at all locations where air space lot boundaries change.
16. The owners of the property will record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.
17. A Covenant and Agreement will be recorded satisfactory to the City Engineer binding the subdivider and all successors to the following:
 - a. That the owners shall be required to maintain all elements of the structure below the limited easement areas in a safe and usable condition to the satisfaction of the City Engineer. The City shall be given reasonable access to the structure within and adjacent to the below easement areas for any necessary inspection, upon request during normal business hours. The City may request the owners to repair or replace damaged, defective, or unsafe structural elements or to correct unacceptable conditions at the owner's expense if owner elects not to do so. Owner shall grant reasonable access to City's contractors to make said repairs.
 - b. The owner shall be required to limit use and occupancy of the structures below the limited easement areas for vehicular parking use only. No combustible material shall be stored in the merger area.
 - c. The owners shall obtain a B-permit from the City Engineer for any substantial structural modification below the limited easement areas and for any structural modification areas and for any structural element outside said areas which provides lateral or vertical support to structures within said areas.
18. The subdivider will execute and record an agreement satisfactory to the City Engineer to waive any right to make or prosecute any claims or demands against the City for any damage that may occur to the proposed structure underneath the sidewalk areas in connection with the use and maintenance operations within said easements.
19. Any surcharge fee in conjunction with the street merger requests will be paid.

Note: See also Condition S-3 for Street Improvement conditions.

Any questions regarding this report should be directed to Quyen Phan of the Permit Case Management Division Section, via quyen.phan@lacity.org.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

20. Per Sec. 17.56 of the Los Angeles Municipal Code, each approved Tract Map recorded with the County Recorder shall contain the following statement: "The approval of this Tract

Map shall not be construed as having been based upon geological investigation such as will authorize the issuance of building permits on the subject property. Such permits will be issued only at such time as the Department of Building and Safety has received such topographic maps and geological reports as it deems necessary to justify the issuance of such building permits.”

21. The applicant shall comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

22. The Department of Building and Safety Zoning Section has reviewed the above Subdivision Map, date stamped on February 14, 2022, by the Department of City Planning. The site is designated as being in a **C2-4D Zone**. A clearance letter will be issued stating that no Building or Zoning Code violations exist relating to the subdivision on the subject site once the following items have been satisfied.
 - a. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.
 - b. Provide a copy of affidavit PKG-4743, PKG-5248, PKG-5261, AFF-10509, AFF-11147, and AFF-18103. Show compliance with all the conditions/requirements of the above affidavit(s) as applicable. Termination of above affidavit(s) may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.
 - c. Provide a copy of ZA case ZA-2021-7053-ZAI. Show compliance with all the conditions/requirements of the ZA case as applicable.
 - d. Provide a copy of CPC case CPC-2017-505-TDR-SPR. Show compliance with all the conditions/requirements of the CPC case(s) as applicable.
 - e. Obtain Bureau of Engineering approval for the proposed street merger.
 - f. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. “Area” requirements shall be re-checked as per net lot area after street dedication. Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedication(s).
 - g. Record a Covenant and Agreement to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

Notes:

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

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

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

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

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

DEPARTMENT OF TRANSPORTATION

23. A minimum of 20-foot reservoir space will be provided between any security gate(s) and the property line when a driveway is serving less than 100 parking spaces. Reservoir space will increase to 40 feet and 60 feet when the driveway is serving more than 100 and 300 parking spaces, respectively, or as shall be determined to the satisfaction of the Department of Transportation.
24. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk, LAMC 12.21 A.
25. Los Angeles Department of Transportation (LADOT) recommends approval of the 36-foot-wide driveway on Hope Street. Final driveway width shall be determined by the Department of Public Works.
26. There should be 20 feet of full-curb-height between the service driveway and residential driveway. All vehicles may enter any 2-way driveway and once beyond the queuing area vehicular ingress may split to serve the service vehicles and residential vehicles. Project shall also meet the code requirement for Section 12.21 A-5(j) Internal Circulation. All portions of a public parking area or public garage shall be accessible to all other portions thereof without requiring the use of any public street, unless the Department of Transportation determines that such use is not detrimental to the flow of traffic.
27. A parking area and driveway plan will be submitted to the Citywide Planning Coordination Section of the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 201 N. Figueroa Street Room 550. For an appointment, contact LADOT's One Stop email at: ladot.onestop@lacity.org
28. A fee in the amount of \$205 will be paid for the Department of Transportation as required per Ordinance No. 180542 and LAMC Section 19.15 prior to recordation of the final map. Note: the applicant may be required to comply with any other applicable fees per this new ordinance.

Please contact this section at ladot.onestop@lacity.org for any questions regarding the above.

FIRE DEPARTMENT

29. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:
- a. Access for Fire Department apparatus and personnel to and into all structures shall be required.
 - b. Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.
 - c. One or more Knox Boxes will be required to be installed for LAFD access to project. Location and number to be determined by LAFD Field Inspector. (Refer to FPB Req # 75).
 - d. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - e. Fire Lane Requirements:
 1. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
 2. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
 3. Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
 4. Submit plot plans indicating access road and turning area for Fire Department approval.
 5. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
 6. Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
 7. Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
 8. All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
 9. No framing shall be allowed until the roadway is installed to the satisfaction of

the Fire Department.

- f. Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.
- g. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
- h. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- i. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
- j. The entrance to a Residential lobby must be within 50 feet of the desired street address curb face.
- k. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- l. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)
 - (i) When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
 - (ii) It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.
 - (iii) This policy does not apply to single-family dwellings or to non-residential buildings.
- m. Site plans shall include all overhead utility lines adjacent to the site.

- n. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
- o. No proposed development utilizing cluster, group, or condominium design of one- or two-family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.
- p. On small lot subdivisions, any lots used for access purposes shall be recorded on the final map as a "Fire Lane".
- q. Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.
- r. Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan S-470-0.
- s. Standard cut-corners will be used on all turns.
- t. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.
- u. The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Safety Plan, which is an element of the General Plan of the City of Los Angeles.
- v. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities.
- w. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.
- x. During demolition, the Fire Department access will remain clear and unobstructed. The Fire Department has no objection to the Airspace Vacation.
- y. FPB #105 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.
- z. That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- (i) The establishment of a property owners association, which shall cause a yearly inspection, to be made by a registered civil engineer, of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
- (ii) The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.
- (iii) In the event that the property owner's association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
- (iv) Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.
- (v) That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.
 - aa. The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.
 - bb. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.
 - cc. Provide Fire Department pathway front to rear with access to each roof deck via gate or pony wall less than 36 inches.
 - dd. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, Private Street or Fire Lane. This stairwell shall extend onto the roof.
 - ee. Entrance to the main lobby shall be located off the address side of the building.
 - ff. Any required Fire Annunciator panel or Fire Control Room shall be located within 20ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
 - gg. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

- hh. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.
- ii. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting please call **(213) 482-6543**. You should advise any consultant representing you of this requirement as well.

BUREAU OF STREET LIGHTING

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

NOTES:

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

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

Note: See also Condition S-3(c) for Street Lighting Improvement conditions.

DEPARTMENT OF RECREATION AND PARKS

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

DEPARTMENT OF WATER AND POWER

- 32. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1(c).).

BUREAU OF SANITATION

33. The Clean Water Conveyance Divisions of the Bureau of Sanitation has inspected the sewer/storm drain lines serving the subject tract and found no potential problems to their structure or potential maintenance problem, as stated in the memo dated June 22, 2021, 2021. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Clean Water Conveyance Divisions will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

INFORMATION TECHNOLOGY

34. To assure that cable television facilities will be installed in the same manner as other required improvements, please email cabletv.ita@lacity.org that provides an automated response with the instructions on how to obtain the Cable TV clearance. The automated response also provides the email address of 3 people in case the applicant/owner has any additional questions.

URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING

35. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 or as approved by the Board of Public Works and Urban Forestry Division.
36. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The sub divider or contractor shall notify the Urban Forestry Division at: (213) 847- 3077 upon completion of construction for tree planting direction and instructions.

Notes:

Removal of street trees requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS

37. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
 - a. Limit the proposed development to one master ground lot and 9 airspace lots for condominium purposes.
 - b. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.

38. Prior to the issuance of the building permit or the recordation of the final map, a copy of CPC-2017-505-TDR-ZV-SPPA-DD-SPR and ZA-2021-7053-ZAI shall be submitted to the satisfaction of the Advisory Agency. In the event CPC-2017-505-TDR-ZV-SPPA-DD-SPR and ZA-2021-7053-ZAI are not approved, the subdivider may be required to submit a tract modification.
39. Tribal Cultural Resource Inadvertent Discovery. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, auguring, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning.
 - If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
 - The Applicant shall implement the tribe's recommendations if a qualified archaeologist and a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably conclude that the tribe's recommendations are reasonable and feasible.
 - The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
 - If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
 - The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified

archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

40. Haul Route Conditions:

- a. Loaded Trucks: Exit job site on 8th St (Westbound); Right turn onto N/B Harbor Fwy (CA-110) on-ramp.
- b. Empty Trucks: N/B Harbor Fwy (CA-110); Exit towards James M. Wood Bl/9th St. (Eastbound); Left turn on Olive St. (Northbound); Left turn onto 8th St (Westbound) to jobsite.
- c. Days and Hours of Hauling Operation: Hauling should be from 9:00 AM to 3:30 PM weekdays, and 8:00 AM to 6:00 PM on Saturdays. No hauling should be performed on Sundays.
- d. Staging Area: Trucks shall be staged on job site only. No staging of trucks on city streets at any time.

NOTE: NO INTERFERENCE TO TRAFFIC, ACCESS TO DRIVEWAYS MUST BE MAINTAINED AT ALL TIMES.

- e. The contractor shall contact LADOT at (213) 485-2298 at least four business days prior to hauling to post "Temporary Tow-Away No Stopping" signs along 8th Street, adjacent to the job site for hauling if needed.
- f. Flagger control shall be provided during the hauling operations to assist with ingress and egress of truck traffic on 8th Street.

If you have any questions, please call Syunik Zohrabyan at (213) 972-4943.

41. Construction Equipment. The applicant shall make a good faith effort to ensure that all off-road diesel-powered equipment greater than 50 hp used during Project construction activities meet USEPA Tier 4 Final emissions standards. A copy of each such unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit.

42. Indemnification and Reimbursement of Litigation Costs.

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

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

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

For purposes of this condition, the following definitions apply:

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

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

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

DEPARTMENT OF CITY PLANNING-ENVIRONMENTAL MITIGATION MEASURES.

43. The project shall be in substantial conformance with the project design features (PDFs) mitigation measures (MMs) in the MMP from the Project’s Final Environmental Impact Report and attached to the subject case file (Exhibit B). The implementing and enforcing agencies may determine substantial conformance with the PDFs and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.
43. Implementation. The Mitigation Monitoring Program (MMP), that is part of the case file and attached as Exhibit B, shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Mitigation Measure (MM) and Project Design Feature (PDF) and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each MM and PDF has been implemented. The Applicant shall maintain records demonstrating compliance with each MM and PDF. Such records shall be made available to the City upon request.
44. Construction Monitor. During the construction phase and prior to the issuance of the first demolition or building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of MMs and PDFs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

45. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the MM during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

DEPARTMENT OF CITY PLANNING - STANDARD CONDOMINIUM CONDITIONS

- C-1. That approval of this tract constitutes approval of model home uses, including a sales office and off-street parking. Where the existing zoning is (T) or (Q) for multiple residential use, no construction or use shall be permitted until the final map has recorded or the proper zone has been effectuated. If models are constructed under this tract approval, the following conditions shall apply:

1. Prior to recordation of the final map, the subdivider shall submit a plot plan for approval by the Department of City Planning showing the location of the model dwellings, sales office and off-street parking. The sales office must be within one of the model buildings.
2. All other conditions applying to Model Dwellings under Section 12.22 A.10 and 11 and Section 17.05-O of the LAMC shall be fully complied with satisfactory to the Department of Building and Safety.

- C-2. Prior to the recordation of the final map, the subdivider shall pay or guarantee the payment of a park and recreation fee based on the latest fee rate schedule applicable. The amount of said fee to be established by the Advisory Agency in accordance with LAMC Section 17.12 and is to be paid and deposited in the trust accounts of the Park and Recreation Fund.

- C-3. Prior to obtaining any grading or building permits before the recordation of the final map, a landscape plan, prepared by a licensed landscape architect, shall be submitted to and approved by the Advisory Agency in accordance with CP-6730.

In the event the subdivider decides not to request a permit before the recordation of the final map, a covenant and agreement satisfactory to the Advisory Agency guaranteeing the submission of such plan before obtaining any permit shall be recorded.

- C-4. In order to expedite the development, the applicant may apply for a building permit for an apartment building. However, prior to issuance of a building permit for apartments, the registered civil engineer, architect or licensed land surveyor shall certify in a letter to the Advisory Agency that all applicable tract conditions affecting the physical design of the building and/or site, have been included into the building plans. Such letter is sufficient to clear this condition. In addition, all of the applicable tract conditions shall be stated in full on the building plans and a copy of the plans shall be reviewed and approved by the Advisory Agency prior to submittal to the Department of Building and Safety for a building permit.

OR

If a building permit for apartments will not be requested, the project civil engineer, architect or licensed land surveyor must certify in a letter to the Advisory Agency that the applicant will not request a permit for apartments and intends to acquire a building permit for a condominium building(s). Such letter is sufficient to clear this condition.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

- S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the LAMC.
- (b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.
- (c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.
- (d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided by the City.
- (e) That drainage matters be taken care of satisfactory to the City Engineer.
- (f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.
- (g) That any required slope easements be dedicated by the final map.
- (h) That each lot in the tract complies with the width and area requirements of the Zoning Ordinance.
- (i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use for access purposes until such time as they are accepted for public use.
- (j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.
- (k) That no public street grade exceeds 15%.

- (l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.
- S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:
- (a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.
 - (b) Make satisfactory arrangements with the Department of Transportation with respect to street name, warning, regulatory and guide signs.
 - (c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.
 - (d) All improvements within public streets, private street, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.
 - (e) Any required bonded sewer fees shall be paid prior to recordation of the final map.
- S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:
- (a) Construct any necessary mainline sewer satisfactory to the B-Permit Engineering Office.
 - (b) Construct any necessary drainage facilities.
 - (c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting as required below:

IMPROVEMENT CONDITION: Construct new pedestrian lights: two (2) on Hope St., four (4) on 8th St., and two (2) on Grand Avenue. If street widening per BOE improvement conditions, relocate and upgrade street lights; two (2) on Hope St., four (4) on 8th St., and two (2) on Grand Avenue.

Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

Conditions set: 1) in compliance with Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.
 - (d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau

of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Street Tree Division (213-485-5675) upon completion of construction to expedite tree planting.

- (e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.
- (f) Construct access ramps for the handicapped as required by the City Engineer.
- (g) Close any unused driveways satisfactory to the City Engineer.
- (h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.
- (i) Improve 8th Street adjoining the subdivision by the construction of new concrete curb, gutter and a 17-foot wide concrete sidewalk with tree wells. Repair and or replace any damaged, cracked or off-grade concrete bus pad and roadway pavement, including any necessary removal and reconstruction of the existing improvements all satisfactory to the City Engineer:
- (j) Improve Hope Street being dedicated and adjoining the subdivision by the construction of a new concrete curb, gutter, and an 18-foot wide concrete sidewalk with tree wells. Repair and or replace any damaged, cracked or off- grade roadway pavement, including any necessary removal and reconstruction of the existing improvements all satisfactory to the City Engineer.
- (k) Improve Grand Avenue adjoining the easement by the construction of a new concrete curb, gutter, and a 24-foot wide concrete sidewalk with tree wells. Repair and or replace any damaged, cracked or off-grade roadway pavement, including any necessary removal and reconstruction of the existing improvements all satisfactory to the City Engineer.
- (l) Improve all newly dedicated property line returns and corner cuts, easement line returns, and corner cut easements with concrete sidewalks and reconstruct all existing curb ramps per BOE's latest Standards and per Special Order 04-0222.
- (m) Construct any necessary on-site mainline and house connection sewers satisfactory to the City Engineer.
- (n) That Board of Public Works approval be obtained, prior to the recordation of the final map, for the removal of any tree in the existing or proposed right-of-way area associated with improvement requirements outlined herein. The Bureau of Street Services, Urban Forestry Division is the lead agency for obtaining Board of Public Works approval for removal of such trees.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However, the existing or proposed zoning may not permit this number of units.

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

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

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

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

FINDINGS

(As Amended by the City Planning Commission at its meeting on July 13, 2023)

FINDINGS OF FACT (CEQA)

I. Introduction

This Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of the 8th, Grand and Hope Project (Project), located at 754 South Hope Street and 609 to 625 West 8th Street in the City of Los Angeles (Site or Project Site). The Project entails the development of a 50-story mixed-use development comprised of 580 residential units and up to 7,499 square feet of ground floor commercial/retail/restaurant space on a 34,679-square-foot site. The Project would provide vehicle parking within three subterranean levels and eight above-grade levels, and on the ground floor. To accommodate the Project, an existing surface parking lot and four-story parking structure would be demolished. Upon completion, the total building floor area would be 554,927 square feet with a maximum height of 592 feet and a Floor Area Ratio (FAR) of approximately 9.25:1.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an environmental impact report (EIR) (Case Number ENV-2017-506-EIR/State Clearinghouse No. 2019050010). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines). The findings discussed in this document are made relative to the conclusions of the EIR.

CEQA Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” CEQA Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

- 1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

- 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.
- 3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely “potentially significant,” these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects – A description of the environmental effects identified in the EIR.
- Project Design Features – A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures – A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding – One or more of the three possible findings set forth above for each of the significant impacts.
- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project’s benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines §15093, 15043[b]; see also CEQA § 21081[b].)

II. Environmental Review Process

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the Los Angeles Department of City Planning (serving as Lead Agency) in accordance with the requirements of the CEQA (PRC 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines (14 Cal. Code Regs. §§ 15000 et seq.).

Notice of Preparation. Pursuant to the provisions of Section 15082 of the CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and

local agencies, and members of the public for a 30-day period commencing on May 10, 2019, and ending on June 11, 2019. The NOP also provided notice of a Public Scoping Meeting held on May 29, 2019. The purpose of the NOP and Public Scoping Meeting was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. Written comment letters responding to the NOP and the Scoping Meeting were submitted to the City by various public agencies, interested organizations and individuals. The NOP, Initial Study, and NOP comment letters are included in Appendix A of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a “No Project” alternative. The Draft EIR for the Project (State Clearinghouse No. 2019050010), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City adopted CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 46-day public comment period beginning on November 18, 2021, and ending on January 5, 2022. A Notice of Availability (NOA) was distributed on November 18, 2021, to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and the following local libraries: Los Angeles Central Library; Little Tokyo Branch Library; Pico Union Branch Library; Chinatown Branch Library; Echo Park Branch Library; and, Felipe de Neve Branch Library. A copy of the document was also posted online at <https://planning.lacity.org/development-services/eir/8th-grand-and-hope-project-0>. Notices were filed with the County Clerk on November 23, 2021.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor’s Office of Planning and Research State Clearinghouse for distribution to State Agencies on November 18, 2021, and notice was provided in the Los Angeles Times newspaper.

Final EIR. The City released a Final EIR for the Project on January 20, 2023, which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II, Responses to Comments, of the Final EIR. On January 20, 2023, responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were also sent to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties.

Public Hearing. A noticed public hearing for the Project was held by the Deputy Advisory Agency and Hearing Officer on behalf of the City Planning Commission on February 15, 2023.

City Planning Commission. A meeting was held by the City Planning Commission on July 13, 2023 to consider the entitlements and appeals of the tract map and Zoning Administrator's Interpretation.

III. Record of Proceedings.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City approved the Project. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Project plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, and Final EIR and Appendices, and all documents relied upon or incorporated therein by reference;
- The Mitigation Monitoring Program (MMP) prepared for the Project;
- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and related EIR (SCH No. 2019011061);
- Municipal Code of the City of Los Angeles, including but not limited to the Zoning Ordinance and Subdivision Ordinance;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at <https://planning.lacity.org/development-services/eir> (to locate the documents, search for either the environmental case number or project title in the Search Box). The Draft and Final EIR are also available at the following six Library Branches:

- Los Angeles Central Library - 630 West Fifth Street, Los Angeles, CA 90071
- Little Tokyo Branch Library - 203 South Los Angeles Street, Los Angeles, CA 90012
- Pico Union Branch Library - 1030 South Alvarado Street, Los Angeles, CA 90006
- Chinatown Branch Library - 639 North Hill Street, Los Angeles, CA 90012
- Echo Park Branch Library - 1410 West Temple Street, Los Angeles, CA 90026
- Felipe de Neve Branch Library - 2820 West 6th Street, Los Angeles, CA 90057

IV. Project Description

The Project proposes to demolish the existing four-story parking structure and surface parking lot and develop a 50-story, mixed-use building consisting of 580 residential units, and up to 7,499 square feet of ground level commercial/retail/restaurant uses on a 0.83-acre site, resulting in a maximum of 554,927 square feet of floor area with a total FAR of 9.25:1. The proposed building would be comprised of four above-ground tiers with varying step-backs from Hope Street. Parking would be located in three subterranean levels and above grade on Levels 2 through 9, and four vehicle parking spaces would be located on the ground floor.

The maximum depth of the subterranean levels would be approximately 63 feet below ground level. The building's height would be 592 feet above grade to the top of the parapet and 568 feet above grade to the highest roof surface. Rooftop mechanical equipment would extend to a maximum height of 592 feet above grade and would be screened from public view by a parapet.

The ground floor would be occupied by a residential lobby on 8th Street, as well as commercial/retail/restaurant uses, which would be located at the corner of Hope Street and 8th Street and at the corner of Grand Avenue and 8th Street. These commercial/retail/restaurant uses would provide up to a total of 94 outdoor seats. In addition, a ground floor porte cochère/outdoor lobby and four parking spaces would be located internally on the ground floor.

The Project's residential units would be located on Levels 3 through 49. The Project would provide 640 vehicle parking spaces comprised of 602 parking stalls to accommodate the Project's residential parking component, 34 spaces for an adjacent building located at 611 West 6th Street as required by a current parking agreement, and four surplus parking spaces. The Project would also include 251 bicycle parking spaces.

In addition, indoor and outdoor residential amenities would be located on Levels 3, 10, 11, 21, 22, 35, and 36 which would include indoor and outdoor common open space areas with such amenities as pool, gym, spa, yoga and fitness areas; juice bar, barbeque, bar and dining areas; event lawn; board room; co-working spaces; kitchen; and, fire pit. In all, the Project would provide 65,193 square feet of total open space comprised of 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, and 8,596 square feet of outdoor covered open space. The Project would also provide a dog run and pet amenity area on Level 3 that would not be counted toward open space.

Project landscaping would include planting 79 trees on-site and 10 street trees, and paying an in-lieu fee for the 66 additional LAMC required trees and the 4 additional required street trees.

V. No Impact or Less than Significant without Mitigation

Impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and regulatory compliance measures) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by the Project and therefore, no additional findings are needed. The following information does not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Aesthetics:

As discussed on pages 32 through 37 of the Initial Study included in Appendix A of the Draft EIR, and on page VI-16 in Chapter VI, Other CEQA Considerations, of the Draft EIR, pursuant to Senate Bill (SB) 743 and PRC Section 21099(d), a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if it meets certain criteria. The Project meets those criteria since it would be a mixed-use residential project on an infill site within a transit priority area (TPA), as defined in the City's Zoning Information File No. 2452 and PRC Section 21099. Nonetheless, an analysis was provided in the Initial Study included in Appendix A of the Draft EIR for informational purposes only. As described in that analysis, the Project would not: have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway; conflict with applicable zoning and other regulations governing scenic quality; or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, pursuant to SB 743 and PRC Section 21099(d)(1), the Project's aesthetic impacts would be less than significant and would not create any project-level or cumulative impact to aesthetics.

Agriculture and Forestry Resources:

As discussed on pages 38 through 40 of the Initial Study included in Appendix A of the Draft EIR, and on pages VI-16 through VI-18 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project Site is located within an urbanized area, zoned (C2-4D) for urban land uses, is surrounded by urban development, does not contain farmland or forest land, is not zoned for agricultural or forestry use, and is not subject to a Williamson Act contract. Thus, the Project would not: convert farmland to nonagricultural uses; conflict with existing zoning for agricultural use or a Williamson Act contract; conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production; result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment which could result in the conversion of farmland to non-agricultural uses. Therefore, the Project would not create any Project-level or cumulative impact to agriculture and forestry resources.

Air Quality

As discussed on pages IV.A-43 through IV.A-52 and IV.A-62 in Section IV.A, Air Quality, of the Draft EIR, and the Air Quality and Greenhouse Gas Emissions Technical Analysis (Air Quality Analysis) contained in Appendix B of the Draft EIR, the Project is an infill development near transit within an existing urbanized area that would concentrate new residential and commercial uses within a Southern California Association of Governments (SCAG)-designated High Quality Transit Area (HQT) thereby advancing regional goals

to reduce Vehicle Miles Traveled (VMT) and associated emissions through infill development near transit. Also, as shown on Table IV.A-4, *Estimate of Maximum Regional Project Daily Construction Emissions (pounds per day)*, on page IV.A-54 of the Draft EIR, the Project would not exceed any Southern California Air Quality Management District (SCAQMD) significance thresholds for air quality emissions. The Project would include Project Design Features which would have the effect of reducing emissions, including Project Design Feature AIR-PDF-1, which would reduce construction emissions, and GHG-PDF-1, which would reduce criteria pollutant emissions. Thus, the Project would not conflict with or obstruct implementation of the AQMP or conflict with City policies. Therefore, the Project-level and cumulative impacts regarding conflicting with or obstruction of such plans would be less than significant.

As discussed on pages IV.A-52 through IV.A-54 and IV.A-62 in Section IV.A, Air Quality, of the Draft EIR, and the Air Quality Analysis contained in Appendix B of the Draft EIR, and shown in Table IV.A-4 *Estimate of Maximum Regional Project Daily Construction Emissions (pounds per day)*, on page IV.A-54, and Table IV.A-5, *Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2025)*, on page IV.A-55, of the Draft EIR, while Project construction activities and operation would generate air emissions, the Project would not exceed SCAQMD regional emissions thresholds for criteria pollutants during construction or operations. Thus, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable federal or State ambient air quality standard. Therefore, the Project-level and cumulative impacts associated with regional emissions would be less than significant.

As discussed on pages IV.A-54 through IV.A-56 and IV.A-62 in Section IV.A, Air Quality, of the Draft EIR, and the Air Quality Analysis contained in Appendix B of the Draft EIR, and shown in Table IV.A-6, *Estimate of Maximum Localized Daily Project Construction Emissions (pounds per day)*, on page IV.A-58 and Table IV.A-7, *Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2025) (pounds per day)*, on page IV.A-59 of the Draft EIR, while Project construction activities and operation would generate air emissions, localized emissions associated with construction and operation of the Project would be less than the significance thresholds established by the SCAQMD. Therefore, Project and cumulative impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

As discussed on page 42 of the Initial Study included in Appendix A of the Draft EIR, pages IV.A-61 through IV.A-62 in Section IV.A, Air Quality of the Draft EIR, and page VI-17 in Chapter VI, Other CEQA Considerations, of the Draft EIR, no objectionable odors are anticipated as a result of either construction or operation of the Project since construction would involve the use of conventional building materials typical of construction projects of similar type and size and 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 or result in a nuisance as defined by SCAQMD Rule 402. With respect to Project operation, the residential and commercial uses at the Project Site are not the type of land uses associated with odor complaints or objectionable odors. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control. Therefore, Project-level and cumulative impacts related to odors would be less than significant.

Biological Resources:

As stated on pages 42 through 45 of the Initial Study included in Appendix A of the Draft EIR, and on pages VI-17 through VI-18 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project Site is a disturbed urban infill site and does not contain special-status plant or animal species, water bodies, wetlands, riparian habitat or other sensitive natural community. Moreover, the Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Thus, the Project would not: have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS); have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS; have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means; interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or conflict with the provisions of an adopted habitat conservation plan. Therefore, the Project-level and cumulative impacts related to biological resources would be less than significant.

Cultural Resources: (Except Archeological Resources):

As described on pages 46 through 48 of the Initial Study included in Appendix A of the Draft EIR, and on pages VI-18 through VI-19 in Chapter VI, Other CEQA Considerations, of the Draft EIR, there are no listed historical resources or human remains at the Project Site and, therefore, the Project would not cause a direct impact to such cultural resources. The Project would also not result in potentially significant indirect impacts to off-site historic resources located in the vicinity of the Project Site. With regard to human remains, if discovered during construction, such resources would be treated in accordance with state law, including Section 15064.5 of the CEQA Guidelines, PRC Section 5097.98 and Section 7050.5 of the California Health and Safety Code (HSC). Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. For these reasons, the Project would not: cause a substantial adverse change in the significance of a historical resource or disturb any human remains, including those interred outside of dedicated cemeteries; or result in a considerable contribution to cumulative impacts related to historical resources or human remains. Thus, the Project-level and cumulative impacts to historical resources and human remains would be less than significant.

(As to archeological resources, see discussion in Section VI, Less than Significant with Mitigation, below.)

Energy Resources:

As discussed on pages IV.B-21 through IV.B-44 in Section IV.B, Energy, of the Draft EIR, and the Energy Analysis calculations included as Appendix C of the Draft EIR, Project construction activities and operation would consume electricity, natural gas and transportation fuel. However, this consumption would occur in accordance with both applicable energy efficiency regulations and the Project's Transportation Demand Management (TDM) requirements, as well as Project Design Features GHG-PDF-1 (which requires the incorporation of the additional energy conservation features required to reach

LEED certification or equivalent green building standards) and WAT-PDF-1 (water conservation features which in turn reduce energy demand for water conveyance systems). Moreover, the Project would not conflict with the 2020-2045 RTP/SCS as it would develop a high-density mixed-use infill project within a SCAG-designated HQTAs and City-designated TPA in close proximity to transit, which would maximize transit and other alternative modes of transportation and minimize VMT and energy use. As such, the Project would not: result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation; or conflict with or obstruct a State or local plan for renewable energy or energy efficiency; or result in a considerable contribution to cumulative impacts related to energy resources. Therefore, the Project-level and cumulative impacts to energy resources would be less than significant.

Geology and Soils (Except Paleontological Resources):

As described on pages 49 through 54 of the Initial Study and the Geotechnical Report included as Appendix IS-4 of the Initial Study, both of which are included in Appendix A of the Draft EIR, and on pages VI-19 through VI-20 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project Site is relatively flat with no geological or soils conditions which would be exacerbated by the Project, nor is the Project Site: located on known active or potentially active underlying fault or within an Alquist-Priolo Earthquake Fault Zone or City-designated Fault Rupture Study Area; contain active or potentially active faults with the potential for surface fault rupture directly beneath the Project; susceptible to liquefaction; in a landslide area; contain expansive soils (after excavation and removal of soils for subsurface parking); or contain unique geological features. As such, and with implementation of regulatory requirements, the Project would not: cause potential substantial adverse effects, caused in whole or in part by the Project's exacerbation of the existing environmental conditions, involving fault rupture, strong seismic ground shaking, seismic-related ground failure (including liquefaction), or landslides; result in substantial soil erosion or loss of topsoil; be located on a geologic unit that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the Project's exacerbation of the existing environmental conditions; result in impacts associated with expansive soils, creating substantial direct or indirect risks to life or property; or result in a cumulatively considerable impact related to geology and soils. In addition, the Project would not include any septic systems. Therefore, the Project-level and cumulative impacts related to geology and soils would be less than significant.

(As to paleontological resources, see discussion in Section VI, Less than Significant with Mitigation, below.)

Greenhouse Gas Emissions:

As discussed on pages IV.C-40 through IV.C-80 in Section IV.C, Greenhouse Gas Emissions, of the Draft EIR and in the Air Quality and Greenhouse Gas Emissions Technical Report included in Appendix B of the Draft EIR, the Project would generate greenhouse gas (GHG) emissions during construction and operation. However, the Project would be subject to applicable GHG emission reduction, energy conservation, and TDM requirements, would implement Project Design Features GHG-PDF-1 (which requires incorporation the additional energy conservation features required to attain LEED certification or equivalent green building standards), WAT-PDF-1 (which requires water conservation and waste reduction measures which in result in lower GHG emissions), and

AIR-PDF-2 (which reduces criteria air pollutants from fireplaces and thereby reduces GHG emissions), and would be developed on an urban infill site within an HQT and TPA in close proximity to transit, all of which would reduce the Project's energy consumption, VMT, and associated GHG emissions. Although a quantitative analysis of GHG emissions was provided in the Draft EIR (pages IV.C-70 through IV.C-80 and Appendix B), since there are no adopted thresholds of significance for GHG emissions, the Project was analyzed to determine if it would conflict with plans adopted to reduce GHG emissions. As discussed on pages IV.C-48 through IV.C-70 of the Draft EIR, the Project would not conflict with such plans for all the reasons set forth in Table IV.C-5, *Consistency Analysis—2008 Climate Change Scoping Plan and Subsequent Updates*, on pages IV.C-52 through IV.C-55, Table IV.C-6, *Consistency with Applicable GHG Emissions Goals and Actions of City's Green New Deal*, on pages IV.C-64 through IV.C-65, and Table IV.C-7, *Project Consistency with 2045 Carbon Neutrality Goals*, on page IV.C-69, of the Draft EIR.

Additionally, as discussed on pages IV.C-56 through IV.C-62 of the Draft EIR, the Project would not conflict with the 2020-2045 RTP/SCS GHG emissions reduction strategies as the Project represents the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options. Also, as discussed on page IV.C-80 of the Draft EIR, the Project's contribution to cumulative global GHG emissions would not be cumulatively considerable. As such, the Project would not: generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG. Therefore, the Project-level and cumulative impacts related to GHG emissions would be less than significant.

Hazards and Hazardous Materials:

As discussed on pages 56 through 60 of the Initial Study and Appendix IS-6, the Environmental Assessment Phase I and the Screening Subsurface Assessment Phase II (ESA Phase I and II) of the Initial Study, both included in Appendix A of the Draft EIR, and on pages VI-21 through VI-23 in Chapter VI, Other CEQA Considerations, of the Draft EIR: the current uses of the Project Site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products; the Project would not use large quantities of hazardous materials; given the types of uses proposed by the Project (residential, commercial/retail/restaurant and associated parking uses), the Project would not include the routine transport, use or disposal of substantial amounts of hazardous materials, and would follow all applicable hazardous materials regulations and manufacturer specifications/instructions; the Project would comply with all applicable regulations regarding the handling, disposal and accidental spill or release of hazardous materials including methane, asbestos and lead-based paint; the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of a school; the Project Site is not on the lists maintained pursuant to Government Code Section 65962.5 nor other hazardous materials list. As discussed on page IV-22 to IV-23 of Chapter IV, Other CEQA Considerations, of the Draft EIR, the Project Site is not located within two miles of an airport or airport land use plan; Project Design Feature TR-PDF-1 incorporates the implementation of a construction traffic management plan to ensure that construction activities would not interfere with adopted emergency response/evacuation plans; the Project will comply with LAMC and Los Angeles Fire Department regulations regarding emergency access; the Project Site is not located in a City-designated Very High Fire Hazard Severity Zone of fire buffer zone; and, the Project's contribution to a cumulative impact related to hazards and hazardous

materials would not be cumulatively considerable. As such, the Project would not: create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving hazardous materials; emit hazardous emissions within one-quarter mile of a school; be located on listed hazardous materials sites and create a significant hazard caused from the Project's exacerbation of existing environmental conditions; result in a safety hazard; impair implementation of or physically interfere with an adopted emergency response or evacuation plan; expose people or structures to a significant risk involving wildland fires; or result in a considerable contribution to cumulative impacts related to hazards or hazardous materials. Therefore, the Project-level and cumulative impacts related to hazards and hazardous material would be less than significant.

Hydrology and Water Quality:

As discussed on pages 61 through 66 of the Initial Study and Appendix IS-7, the Hydrology and Water Quality Memo, of the Initial Study, both of which are included in Appendix A of the Draft EIR, and on pages VI-23 to VI-25 in Chapter VI, Other CEQA Considerations, of the Draft EIR, Project construction and operational activities would be subject to applicable water quality, drainage and erosion requirements (e.g., the Project would implement National Pollutant Discharge Elimination System (NPDES) Construction General Permit, and City regulations including grading requirements, Best Management Practices (BMPs), and Low Impact Development (LID) Ordinance requirements) that would avoid the violation of water quality standards and waste discharge requirements and avoid substantial erosion; the Project would not include groundwater withdrawals and would slightly reduce the imperviousness of the Project Site and improve infiltration through implementation of infiltration BMPs that comply with the LID Ordinance and, therefore, avoid decreases in groundwater supplies or recharge; and the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan; the Project would not include land uses (industrial uses, landfills, etc.) or features (e.g., septic systems, fuel USTs, etc.) that could cause substantial surface or groundwater contamination; and, the Project would not impede or redirect flood flows nor is it located within a 100-year flood plain area, including the 100-year flood zone designated by the Federal Emergency Management Agency (FEMA), nor is it in a tsunami or seiche zone and is, therefore, not subject to inundation from 100-year floods, tsunamis or seiches. For all these reasons, the Project would not: violate water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality; substantially decrease groundwater supplies or interfere substantially with groundwater recharge; result in substantial erosion/siltation; create runoff that exceeds stormwater drainage system capacity or create substantial polluted runoff; impede/redirect flood flows; risk release of pollutants due to inundation from 100-year floods, tsunamis or seiches; or result in a cumulatively significant contribution to cumulative impacts related to hydrology or water quality. As such, the Project-level and cumulative impacts related to hydrology and water quality would be less than significant.

Land Use and Planning:

As discussed on page 67 of the Initial Study included in Appendix A of the Draft EIR and on page VI-25 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project would not physically divide an established community since the Project would be located on an urban infill site that is surrounded by properties with similar residential or commercial uses as proposed for the Project, would be constructed within the Project Site with some improvements to the adjoining sidewalks, and therefore does not propose any physical

features that would divide the community. As such, the Project would not contribute to a cumulative impact related to physically dividing an established community. Therefore, Project-level and cumulative impacts associated with the physical disruption of a community would be less than significant.

As discussed on pages IV.D-20 through IV.D-40 in Section IV.D, Land Use and Planning, of the Draft EIR, and the Land Use Tables contained in Appendix D of the Draft EIR, the Project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, including the 2020-2045 RTP/SCS, the AQMP, the City General Plan's Framework Element (including the Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, and Infrastructure and Public Services Chapters), Housing Element, Conservation Element and Health and Wellness Element, the Mobility Plan 2035, the Central City Community Plan, the Citywide Design Guidelines, the Downtown Design Guidelines, and the LAMC. As explained in Section IV.D and the tables in Appendix D of the Draft EIR, the Project would not conflict with these plans, policies, regulations, objectives or strategies because, among other things, the Project would: create an urban in-fill development within an HQTAs and TPA, and in close proximity to transit which would encourage alternative modes of transit and reduce VMT and air emissions; contribute to the needs of the City's existing and future residents, businesses, and visitors by replacing a parking structure and surface parking lot with a mixed-use high-rise development; be developed in accordance with the development standards set forth in the LAMC and the design standards of the Citywide and Downtown Design Guidelines; promote the construction of green buildings by incorporating sustainable design features, including energy conservation, water conservation, a pedestrian- and bicycle-friendly site design, and waste reduction measures; be consistent with City and SCAG RTP/SCS growth projections; increase housing and job opportunities in the Project area; contain bicycle parking and amenities as well as improve pedestrian walkability in the Project Site vicinity by the expansion and reconstruction of the existing sidewalk and inclusion of street trees; and, include stormwater treatment BMPs that would collect and treat rainwater and thereby assist in improving the quality of stormwater runoff.

Additionally, as discussed on pages IV.D-30 through IV.D-34 of the Draft EIR, with approval of the requested discretionary actions, including allowing a transfer of floor area (TFAR) from the Los Angeles Convention Center to the Project Site to permit a Project FAR of 9.25:1, the Project would be consistent with the LAMC. Also, for the reasons set forth on page IV.D-41 of the Draft EIR, the Project's contribution to cumulative impacts related to land use and planning would not be cumulatively considerable. Therefore, the Project-level and cumulative impacts associated with conflicts with land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

Mineral Resources:

As discussed on page 68 of the Initial Study included in Appendix A of the Draft EIR, and on pages VI-25 through VI-26 in Chapter VI, Other CEQA Considerations, of the Draft EIR, no mineral extraction operations currently occur on the Project Site or in the Project Site area, and the Project Site is located within an urbanized area that has been previously disturbed by development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey or within a City-designated oil field or oil drilling area. Thus, the Project would not: result

in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State; or result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. As such, the Project would not contribute to a cumulative impact related to mineral resources. Therefore, the Project would not create any Project-level or cumulative impacts to mineral resources.

Noise (Off-Site Construction Noise; On-Site and Off-Site Operational Noise; Off-Site Construction Vibration – Building Damage; Operational Vibration):

As discussed on pages IV.E-24 through IV.E-30 in Section IV.E, Noise, of the Draft EIR and shown on page IV.E-29, Table IV.E-12, *Off-Site Construction Truck Noise Levels*, and the noise calculation worksheets included in Appendix E of the Draft EIR, the off-site truck noise would not exceed the noise level significance criteria along the Project truck route (8th Street, James M. Wood Boulevard/9th Street and Olive Street). Therefore, off-site construction noise levels would be less than significant.

As discussed on pages IV.E-30 through IV.E-38 and tables shown therein, and pages IV.E-54 through IV.E-61 in Section IV.E, Noise, of the Draft EIR, Project operation and cumulative operation noise from: on-site stationary noise sources, outdoor spaces, parking facilities, and loading dock and trash collection areas; off-site mobile noise sources; composite noise levels; and cumulative operational noise levels, would not exceed the significance criteria of 3 dBA over ambient noise levels for sensitive receptors or 5 dBA over ambient noise levels for all other receptors. As such, Project operations would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the City's General Plan or noise ordinance, nor applicable standards of other agencies. Therefore, the Project-level and cumulative noise impacts from on- and off-site sources would be less than significant.

As discussed on pages IV.E-46 through IV.E-48 in Section IV.E, Noise, of the Draft EIR, vibration impacts associated with temporary and intermittent vibration from off-site construction activities would be less than significant with respect to building damage. In addition, vibration impacts resulting from Project operation would be less than significant.

As discussed on pages IV.E-57 through IV.E-61 in Section IV.E, Noise, of the Draft EIR, due to noise regulations and the distance from the Project Site to the Related Project sites, cumulative operation generated vibrations and construction vibrations resulting in building damage or human annoyance (other than off-site vibration resulting in human annoyance related to the Related Projects using the same haul routes), the Project would not result in cumulative vibration impacts. Therefore, the cumulative vibration impacts of the Project (other than human annoyance related to off-site construction truck traffic) would be less than significant.

As discussed on page 69 of the Initial Study included in Appendix A of the Draft EIR, and on page VI-26 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project Site is not located within two miles of an airport, airstrip or within an area subject to an airport land use plan. As such, the Project would not expose people working in the Project area to excessive noise levels from airports or airstrips and the Project would not contribute to a cumulative impact. Therefore, the Project would not result in Project-level or cumulative impacts related to airport noise.

(As to all other noise and vibration impacts, see discussion in Section VII, Significant and Unavoidable, below.)

Population and Housing:

As discussed on pages 70 through 71 of the Initial Study included in Appendix A of the Draft EIR and on pages VI-26 through VI-28 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project would generate construction jobs during the construction period, and residential and employee populations during operation which would be within SCAG's growth projections for the region. The majority of the Project's growth would be residential population, as the Project's 580 residential units would create a population of up to 1,398 persons. The Project's increment of the cumulative housing population growth would not be substantial since the Project's projected population would represent approximately 0.81 percent of the anticipated population growth between 2019 and 2025 (the Project's buildout year) and the housing units would represent approximately 0.66 percent of the housing growth forecasted between 2019 and 2025. As further discussed, Project operation would generate 30 new employees which would constitute approximately 0.05 percent of the employment growth forecasted between 2019 and 2025. Additionally, the temporary construction jobs would be expected to be filled by workers traveling to the Project Site who would not relocate their households for such short-term employment opportunities and some construction and operation employment opportunities would be filled by people already residing in the area. Regarding population and housing displacement, as discussed on pages 71 through 72 of the Initial Study included in Appendix A of the Draft EIR, the Project would have no impact because the Project would not displace an existing residential population since the Project Site currently consists of a parking structure and surface parking that contain no residential housing units. Also, as described in Chapter II, Project Description of the Draft EIR, the Project does not include the extension of roads or other infrastructure to currently unserved areas. As such, the Project would not: induce substantial unplanned population growth in an area, either directly or indirectly, or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the Project would not result in significant Project-level and cumulative population and housing impacts.

Public Services - Fire Protection:

As discussed on pages IV.F.1-18 through IV.F.1-24 in Section IV.F.1, Public Services - Fire Protection, of the Draft EIR, the Project would implement a Project Design Feature TR-PDF-1 (Construction Management Plan and Worksite Traffic Control Plan) to ensure adequate emergency access during construction. As further indicated therein, with the implementation of this Project Design Feature, and with compliance with applicable fire regulatory requirements, including Los Angeles Fire Department's (LAFD) fire/life safety plan review and safety inspection for new construction projects, and fire flow requirements, the Project would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment during Project construction and operation. As a result, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire department facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Additionally, as discussed on pages IV.F.1-24 through IV.F.1-26 in Section IV.F.1, Public Services – Fire Protection, of the Draft EIR, the Project and the Related Projects would generate revenue to the City's General Fund that could be used

to fund additional fire protection facilities and staff to offset any cumulative impacts. Therefore, the Project would not result in significant impacts. Therefore, Project-level and cumulative impacts to fire facilities and services would be less than significant.

Public Services - Police Protection:

As discussed on pages IV.F.2-11 through IV.F.2-15 in Section IV.F.2, Public Services - Police Protection, of the Draft EIR, the Project would implement Project Design Features POL-PDF-1 (implementation of security measures during construction) and POL-PDF-2 through POL-PDF-7 (implementation of security measures during operation) to ensure safety and reduce the need for police services during construction and operation. As further indicated therein, with the implementation of these Project Design Features and City-required security measures, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered Los Angeles Police Department (LAPD) facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Additionally, as discussed on pages IV.F.2-15 through IV.F.2-24 in Section IV.F.2, Public Services – Police Protection, in the Draft EIR, the Project and the Related Projects would generate revenue to the City's General Fund that could be used to fund additional police protection facilities and staff to offset any cumulative impact. Therefore, Project-level and cumulative impacts to police facilities and services would be less than significant.

Public Services - Schools:

As discussed on pages 72 through 73 of the Initial Study included in Appendix A of the Draft EIR and on pages VI-28 through VI-29 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project includes the development of new residential land uses, which directly generate school-aged children and a demand for public educational services. However, the Project would pay fees pursuant to Section 65995 of the California Government Code addressing construction of school facilities which is deemed to be full mitigation of a project's development impacts. Thus, with the payment of these fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for schools. The Related Projects would also be subject to the payment of these developers' fees. Therefore, with compliance with Government Code Section 65995, Project-level and cumulative impacts related to public school facilities and services would be less than significant.

Public Services - Parks and Recreation:

As discussed on pages 73 through 76 of the Initial Study included in Appendix A of the Draft EIR and on pages VI-29 through VI-30 in Chapter VI, Other CEQA Considerations, of the Draft EIR, there are over 30 parks and recreational facilities within a 2-mile radius of the Project Site which could be used by the Project's residents, visitors and employees. However, as indicated therein, this use would not be expected to be of such intensity that it would cause or accelerate substantial physical deterioration of the off-site public parks given the Project's provision of on-site open space and recreational amenities and compliance with the Quimby Act. As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for parks. In addition, similar to the Project, Related Projects consisting of more than 50 residential

units would also be subject to a Quimby in-lieu fee, or dedication of land, or be required to provide a combination of land dedication and fee payment for the purpose of developing park and recreational facilities for new residents. Therefore, Project-level and cumulative impacts to park facilities and services would be less than significant.

Public Services - Libraries:

As discussed on pages IV.F.3-10 through IV.F-17 in Section IV.F.3, Libraries, of the Draft EIR, although the Project would generate a residential and employment population that could utilize the six public libraries, which includes the Central Library, within the Project service area, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries. As indicated therein, construction workers and permanent employees that do not already live in the service area would more likely use libraries closer to their homes, and 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. Furthermore, the Project and the Related Projects would generate revenue to the City's General Fund that could be used to fund Los Angeles Public Library (LAPL) expenditures to offset any cumulative impact. Additionally, as discussed on pages IV.F.3-17 through IV.F.3-25 in Section IV.F.3, Libraries, of the Draft EIR, although the LAPL has no plans to expand or build new libraries at this time, if the LAPL determines that new library facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332, or a Mitigated Negative Declaration, and, therefore, would not be expected to result in significant impacts. Therefore, Project-level and cumulative impacts to libraries would be less than significant.

Recreation:

As discussed on pages 77 through 78 of the Initial Study included in Appendix A of the Draft EIR and on page VI-30 in Chapter VI, Other CEQA Considerations, of the Draft EIR, there are many public parks and recreational facilities located in the vicinity of the Project Site. However, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, including a number of recreational amenities throughout the Project Site, it is anticipated that Project residents would often utilize on-site open space and recreational amenities to meet their recreational needs. As further discussed therein, while it is possible that some new employees may utilize local parks and recreational facilities, it is anticipated that the majority of Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours and new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. As such, even with some use spread over the many park and recreational facilities in the Project area, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. Therefore, Project-level and cumulative impacts related to recreational facilities would be less than significant.

Transportation:

As discussed on pages IV.G-23 through IV.G-47 in Section IV.G, Transportation, of the Draft EIR, and in the Transportation Assessment included in Appendix G of the Draft EIR, the Project would generate vehicular, bicycle and pedestrian traffic, would create a demand for public transit, and would include new driveways and other transportation-related improvements. However, as further discussed therein, the Project would: be developed on an urban infill site within a TPA in close proximity to transit (within 2 blocks of the 7th Street/Metro Center Rail station and in the area of multiple LADOT, Metro, Foothill Transit, Torrance, Santa Monica, and Orange County Transportation Authority bus lines); implement transportation-related Project Design Feature TR-PDF-1 (a Construction Management Plan and a Worksite Traffic Control Plan), to ensure emergency access during construction and to encourage a reduction in use of single occupancy vehicles; reduce VMT; provide bicycle parking and amenities on-site; would improve the pedestrian experience through the introduction of active street adjacent uses and street trees; and, not conflict with applicable transportation plans, create dangerous conditions, or result in inadequate emergency access. Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b); substantially increase hazards due to a geometric design feature or incompatible uses; or result in inadequate emergency access. As such, the Project would not have a considerable contribution to a cumulative transportation related impact. Therefore, the Project-level and cumulative impacts related to transportation would be less than significant.

Tribal Cultural Resources:

As discussed on pages IV.H-14 through IV.H-18 in Section IV.H, Tribal Cultural Resources, of the Draft EIR, and in the Tribal Cultural Resources Report included as Appendix H, of the Draft EIR, the Project would include development, excavation and grading activities at the Project Site that could potentially impact tribal cultural resources. However, as further indicated therein, the Project Site soils have been previously disturbed, no tribal cultural resources have been previously recorded at the Project Site or Project vicinity, the tribal consultations required under Assembly Bill 52 did not identify the presence of known tribal cultural resources at the Project Site, and the Project would implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources during construction. Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 21074 that is: listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, or determined by the City in its discretion and supported by substantial evidence, to be significant. Additionally, as the Project would not have a significant impact on tribal cultural resources and the Related Projects would also be subject to applicable regulatory requirements, the City's standard condition of approval for the inadvertent discovery of tribal cultural resources during construction, and/or mitigation as deemed appropriate, the Project's contribution to a cumulative impact would not be considerable. Therefore, Project-level and cumulative impacts related to tribal resources would be less than significant.

Utilities and Service Systems – Wastewater:

As discussed on pages 81 through 83 of the Initial Study included in Appendix A of the Draft EIR and pages VI-31 through VI-34 in Chapter VI, Other CEQA Considerations, of the Draft EIR, and shown on Table VI-1, *Estimated Project Wastewater Generation*, on

page VI-32 of the Draft EIR, and the Wastewater Service Information Report included in Appendix K of the Draft EIR, the Project would generate a demand for wastewater conveyance and treatment infrastructure capacity. However, as further indicated therein: the Project would include connections to the existing off-site sewer mains in compliance with regulatory requirements; the Project would comply with applicable water conservation requirements and implement additional water conservation measures through Project Design Feature WAT-PDF-1 which would result in reduction in water flows; the existing sewer mains in the area have adequate capacity to serve the Project; and the Hyperion Water Reclamation Plant has adequate treatment capacity to serve the Project in addition to existing and projected future commitments. Thus, the Project would not generate wastewater in excess of available capacity or State or local standards. As such, the Project's contribution would not be cumulatively considerable. Hence, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects, and would result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Therefore, Project-level and cumulative impacts related to wastewater would be less than significant.

Utilities and Service Systems – Stormwater Drainage:

As discussed on pages 82 through 83 of the Initial Study included in Appendix A of the Draft EIR and page VI-34 in Chapter VI, Other CEQA Considerations, of the Draft EIR, stormwater flows from the Project Site would not increase with implementation of the Project. Additionally, the Project would comply with the City's LID Ordinance which would improve stormwater drainage over existing conditions, since BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. With implementation of the LID requirements, the on-site stormwater system would be designed to provide an overflow discharge that would flow into existing Los Angeles County Flood Control District facilities that would have adequate capacity to accommodate the Project Site flows. Hence, the Project would not require the construction of new stormwater drainage facilities or expansion or relocation of existing facilities, the construction of which would cause significant environmental impacts. As such, the Project's contribution to cumulative impacts related to stormwater drainage would not be considerable. Thus, Project-level and cumulative impacts related to stormwater drainage would be less than significant.

Utilities and Service Systems – Telecommunications:

As discussed on page 83 of the Initial Study included in Appendix A of the Draft EIR and pages VI-34 through IV-35 in Chapter VI, Other CEQA Considerations, of the Draft EIR, 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. However, 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 telecommunications systems are anticipated, and any work that may affect services to the existing telecommunications lines would be coordinated with service providers. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects, nor would the Project's contribution to a cumulative impact to telecommunications infrastructure be considerable. Therefore, Project-level and

cumulative impacts related to telecommunication infrastructure would be less than significant.

Utilities and Service Systems – Water Supply and Infrastructure:

As discussed on pages IV.I.1-38 through IV.I.1-58 in Section IV.I.1, Utilities and Service Systems – Water Supply and Infrastructure, of the Draft EIR, and the Water Utilities Technical Report and Water Assessment Report included in Appendix I of the Draft EIR, the Project would generate a demand for water and water infrastructure capacity. However, as further indicated therein: the Project would implement an on-site water infrastructure system with connections to existing off-site water mains in compliance with regulatory requirements; the Project would comply with applicable water conservation requirements and would implement additional water conservation measures beyond State and local code requirements through implementation of Project Design Feature WAT-PDF-1 (water conservation features); the existing water mains in the area have adequate capacity to serve the Project; Los Angeles Department of Water and Power (LADWP) water supplies are available to serve the Project along with LADWP's existing and projected future commitments during normal, dry and multiple dry years for the foreseeable future; and, the Project's population would be consistent with the growth projections for the City from the 2020–2045 RTP/SCS. As such, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects and would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, Project-level and cumulative impacts related to water supply and infrastructure would be less than significant.

Utilities and Service Systems – Solid Waste:

As discussed on pages 83 through 87 of the Initial Study included in Appendix A of the Draft EIR and pages VI-35 through VI-38 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project would generate solid waste during construction and operation. However, as indicated therein, the Project would not generate solid waste in excess of available capacity or State or local standards since the Project would meet the mandated diversion rates and the Project's generation of construction and debris waste would represent approximately 0.008 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons, while the solid waste generated during Project operation would amount to approximately 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. As such, the Project's contribution to cumulative impacts related to solid waste would not be cumulatively considerable. Further, 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. Therefore, Project-level and cumulative impacts related to solid waste would be less than significant.

Utilities and Service Systems – Energy Infrastructure:

As discussed on pages IV.I.2-7 through IV.I.2-13 in Section IV.I.2, Utilities and Service Systems - Energy Infrastructure, of the Draft EIR, and in the Energy Calculations included in Appendix C of the Draft EIR, the Project would generate a demand for energy (e.g., electricity and natural gas) infrastructure capacity. However, as further indicated therein: the Project would develop on-site energy infrastructure and connections to the existing

off-site electricity and natural gas lines in compliance with regulatory requirements. As such, the Project would not require or result in relocation or construction of new or expanded energy (electricity and natural gas) facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project-level and cumulative impacts related to energy infrastructure would be less than significant.

Wildfires:

As discussed on page 88 of the Initial Study included in Appendix A of the Draft EIR and on pages VI-38 through VI-39 in Chapter VI, Other CEQA Considerations, of the Draft EIR: the Project Site is located in an urbanized area, there are no wildlands in the vicinity, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or fire buffer zone, and the Project Site is not located near State responsibility lands. As such, the Project would not contribute to a cumulative wildfire impact. Therefore, Project-level and cumulative impacts related to wildfire risks would not occur.

VI. Less than Significant Impacts with Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

A. Cultural Resources – Archeological Resources:

Impact Summary: Although no archeological resources are known to exist on the Project Site or in the nearby vicinity, there is a potential for Project construction, which will include excavation to a depth of 63 feet below the existing ground surface, to encounter previously undisturbed archeological resources. As such, a mitigation measure is necessary to ensure that impacts to archeological resources encountered during construction, if any, would be less than significant.

Project Design Features: No specific Project Design Features are proposed with regard to archaeological resources.

Mitigation Measures: The City finds that Mitigation Measure CUL-MM-1, located on page 47 in the Initial Study included in Appendix A of the Draft EIR, and set forth below and incorporated into the Project would reduce the potentially significant archeological resource impacts to less than significant.

Mitigation Measure CUL-MM-1: Prior to the start of ground-disturbing activities, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior 2008) to carry out the following measure. A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the

materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

Finding: Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the potential significant effects on the environment.

Rationale for Finding: As discussed on page 47 of the Initial Study included in Appendix A of the Draft EIR and on page VI-18 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project Site is located in a highly urbanized area and has been subject to grading and development in the past. As further discussed in Appendix IS-3 of the Initial Study, a records search discovered no known archeological resources on the Project Site or within a 0.5 mile radius of the Project Site. However, Project construction will require excavation to a depth of approximately 63 feet below the existing ground surface and, therefore, there is a potential for discovery of archeological resources in previously undisturbed soils. In the event archaeological materials are encountered during construction, Mitigation Measure CUL-MM-1, would ensure that a qualified archaeologist be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. As there are no known archeological resources on the Project Site or in the vicinity of the Project Site, with implementation of CUL-MM-1 for the inadvertent discovery of archeological resources, the Project's contribution to a cumulative impact would not be considerable. Therefore, with implementation of Mitigation Measure CUL-MM-1, Project-level impacts related to any previously undiscovered archaeological resources would be less than significant.

Reference: For a complete discussion of archeological resources impacts, please see Appendix A, Initial Study, of the Draft EIR and Appendix IS-3, South Central Coastal Information Center Records Search Results, included in the Initial Study, and Chapter VI, Other CEQA Considerations, of the Draft EIR.

B. Geology and Soils - Paleontological Resources:

Impact Summary: Although a records search indicates that there are no fossil deposits within the Project Site boundaries, there have been discoveries made in sedimentary layers similar to the layers found at varying depths on the Project Site. Therefore, since Project construction will require excavation to approximately 63 feet below the existing ground surface, there is a potential for discovery of paleontological resources in previously undisturbed soils. As such, a mitigation measure is necessary to ensure that impacts to paleontological resources encountered during construction, if any, would be less than significant.

Project Design Features: No specific Project Design Features are proposed with regard to paleontological resources.

Mitigation Measures: The City finds that Mitigation Measure GEO-MM-1, located on page 55 in the Initial Study included in Appendix A of the Draft EIR, and set forth below and incorporated into the Project would reduce the potentially significant paleontological resource impacts to less than significant.

Mitigation Measure GEO-MM-1: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

Finding: Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project, which mitigate or avoid the potential significant effects on the environment.

Rationale for Finding: As discussed on pages 54 through 55 in the Initial Study included in Appendix A of the Draft EIR, and in Appendix IS-5 included in the Initial Study, and on page VI-20 of Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project Site is located in a highly urbanized area and has been subject to grading and development in the past; however, underlying older sedimentary deposits are found at various depths on the Project Site which may contain significant fossils. As further discussed in Appendix IS-5 of the Initial Study, a records search discovered no known paleontological resources on the Project Site but did discover fossils in sedimentary deposits similar to those found on the Project Site in the Project vicinity. Moreover, Project construction will require excavation to approximately 63 feet below the existing surface level which will result in reaching the sedimentary deposits that could contain paleontological resources. As such, in the event that paleontological materials are encountered, pursuant to Mitigation Measure GEO-MM-1, a qualified paleontologist would temporarily halt development activity to assess and evaluate the discovered material(s). The qualified paleontologist would provide recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. As a result, with implementation of Mitigation Measure GEO-MM-1, the Project's contribution to a cumulative impact would not be considerable. Therefore, with implementation of Mitigation Measure GEO-MM-1, Project-level impacts related to any previously undiscovered paleontological resources would be less than significant.

Reference: For a complete discussion of paleontological resources, please see Appendix A, Initial Study, of the Draft EIR and Appendix IS-5, Paleontological Resources Records Search, included in the Initial Study and Chapter VI, Other CEQA Considerations of the Draft EIR.

C. Noise - Construction Vibration (Building Damage):

Impact Summary: Project vibration levels generated from on-site construction activities could result in significant impacts with respect to building damage at the adjacent parking structures. Although the Project would be subject to compliance with LAMC Section 91.3307 for protection of the adjoining property from damage during construction, and pursuant to Project Design Feature NOI-PDF-3, impact pile driving methods would not be used, in order to ensure that Project construction vibrations do not cause damage to the multi-story parking structures adjacent to the Project Site to the north, a mitigation measure is necessary to reduce construction-related vibration impacts associated with building damage to a less-than-significant level.

Project Design Features: The following PDF from page IV.E-24 in Section IV.E, Noise, of the Draft EIR, is incorporated into the Project.

Project Design Feature NOI-PDF-3: Project construction will not include the use of driven (impact) pile systems.

Mitigation Measures: The following mitigation measure from page IV.E-49 in Section IV.E, Noise, of the Draft EIR, is identified for the Project to reduce its potentially significant project-level on-site construction noise impacts.

Mitigation Measure NOI-MM-2: Prior to start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the multi-story parking structures adjacent to the Project Site to the north to inspect and document the apparent physical condition of the structures' readily-visible features. The inspection survey shall be made to the extent feasible from the public right of way and within the Project Site's property line.

The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the property line of the parking structure adjacent to the Project Site to the north during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.45 PPV and a regulatory level of 0.5 PPV. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

In the event the warning level (0.45 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

In the event the regulatory level (0.5 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the parking structure and visually inspect the building for any damage. Results of the inspection must be logged, and repairs will be provided in the event any damage occurred. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is measured and below the warning level.

Finding: Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the potential significant effects on the environment.

Rationale for Finding: As discussed on pages IV.E-44 through IV.E-46 and IV.E-48 through IV.E-50 in Section IV.E, Noise, of the Draft EIR, the Project would generate ground-borne construction vibration during building demolition and site excavation and grading from heavy construction equipment. As shown on Table E-22, *Construction Vibration Impacts – Building Damage*, on page IV.E-45 of the Draft EIR, Project on-site construction vibrations would exceed the criteria of significance for the adjacent 4- and 8-story parking structures to the north of the Project Site. Even with compliance with the LAMC for protection of adjacent structures during construction and implementation of Project Design Feature NOI-PDF-3 which prohibits the use of impact pile driving methods, Project construction could result in estimated ground-borne vibration levels of up to 0.523 PPV which exceeds the significance criteria for building damage of 0.5 PPV. Mitigation Measure NOI-MM-2, which requires a structural engineer to survey the property, an acoustical engineer to document the monitoring of construction vibration levels, and sets limits and procedures for assuring that vibration levels at the adjacent parking structures do not exceed 0.5 PPV, would be implemented to ensure that the Project's on-site construction impacts would be reduced to a less-than-significant level. Also, as discussed on page IV.E-53 and IV.E-57 of the Draft EIR, the closest Related Project to the Project Site would be too far away to contribute to Project vibration impacts. Therefore, with implementation of Mitigation Measure NOI-MM-2, Project-level and cumulative impacts associated with building damage due to on-site construction activities would be less than significant.

Reference: For a complete discussion of noise impacts, including from on-site construction vibration impacts related to building damage, please see Section IV.E, Noise, and Appendix E, of the Draft EIR.

VII. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section X below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

- a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and
- b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

A. Noise (Construction Noise, Construction Vibration - Human Annoyance)

1) Impact Summary:

- (a) **On-Site Construction Noise:** Noise impacts from construction of the Project would occur due to use of on-site construction equipment and off-site construction traffic. The Project would incorporate Project Design Feature NOI-PDF-1 which requires that the construction equipment have proper noise muffling devices. However, conservatively assuming that all pieces of construction equipment would be operated simultaneously and would be located at the construction area nearest to the affected receptors, the noise levels would exceed the significance criteria for receptor locations R1, R2, R4, R5 and R6. Therefore, temporary noise impacts associated with the Project's on-site construction would be significant prior to implementation of mitigation measures. However, even with implementation of Mitigation Measure NOI-MM-1 which requires temporary sound barriers, there are no other feasible mitigation measures that would reduce the noise levels at the upper levels of nearby sensitive receptor locations, and the sound levels at receptor locations R1, R2, R4, R5 and R6 would remain significant and unavoidable.
- (b) **Vibration Impacts – Human Annoyance:** Vibration from construction activities for the Project would occur from both the use of on-site construction equipment and from the off-site construction traffic. The estimated ground-borne vibration levels from on-site construction equipment during the demolition and grading/excavation phases of Project construction at receptor location R5 would be 72.2 VdB which exceeds the 72 VdB significance criteria for human annoyance. In addition, the estimated vibration levels generated by off-site construction trucks traveling along the anticipated haul routes which are within 24 feet of residential and hotel uses could reach approximately 72.6 VdB which would exceed the 72 VdB significance criteria for human annoyance. As there are no feasible mitigation measures that could reduce the potential vibration human annoyance impacts, human annoyance vibration impacts from construction generated from on- and off-site construction of the Project would remain significant and unavoidable.
- (c) **Cumulative Impacts:** Should Project construction overlap with construction of Related Project No. 10, located approximately 650 feet west of the Project Site, and Related Project No. 30, located approximately 530 feet southeast of the Project Site, the combined construction noise would create potential cumulative noise impacts at nearby sensitive uses located in proximity to the Project Site. While, similar to the Project, the Related Projects would be expected to incorporate all feasible mitigation measures, there are no feasible mitigation measures that could reduce the noise levels to below the significance threshold. As such, cumulative noise impacts from on-site construction activities from the Project and Related Project Nos. 10

and 30 would be significant and unavoidable. With respect to off-site construction noise, off-site construction trucks would have a potential to result in a cumulative impact if the trucks from the Related Projects used the same truck route as the Project and the number of combined truck trips added up to 52 truck trips along 8th Street, 35 truck trips along James M. Wood Boulevard/9th Street, and 45 truck trips along Olive Street, since at those numbers of trips the noise from the truck traffic would increase to the 5 dBA above ambient noise threshold of significance. As there are no feasible mitigation measures that could reduce the noise levels from the trucks traveling on the haul route streets, cumulative impacts would be significant and unavoidable.

2) Project Design Features: The City finds that Project Design Features NOI-PDF-1 and NOI-PDF-3, located on page IV.E-24 in Section IV.E, Noise, of the Draft EIR, and set forth below, are incorporated into the Project to reduce its noise impacts.

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Project Design Feature NOI-PDF-3: Project construction will not include the use of driven (impact) pile systems.

3) Mitigation Measures: The City finds that Mitigation Measure NOI-MM-1 located on page IV.E-41 in Section IV.E, Noise, of the Draft EIR, and set forth below, is incorporated into the Project to lessen potential impacts of construction period noise on sensitive receptors.

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Grand Avenue (receptor locations R1 and R2). The temporary sound barrier shall be designed to provide a minimum 11-dBA and 5-dBA noise reduction at the ground level of receptor locations R1 and R2, respectively.

Along the southern property line of the Project Site between the construction areas and residential use across the Project Site to the south (receptor location R5) and the SP Lofts on the east side of Grand Avenue to the south (receptor location R4). The temporary sound barrier shall be designed to provide a minimum 11-dBA and 5-dBA noise reduction at the ground level of receptor locations R5 and R4, respectively.

Along the western property line of the Project Site between the construction areas and residential uses at the southwest corner of 8th Street and Hope Street

(receptor location R6). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R6.

4) Finding: Pursuant to PRC, Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

5) Rationale for Finding:

On-site Construction Noise: As discussed on pages IV.E-25 through IV.E-43 in Section IV.E, Noise, of the Draft EIR and shown in the noise calculations contained in Appendix E of the Draft EIR, Project on-site construction activities would create the most noise during the demolition and grading/excavation phases of construction. In analyzing the potential noise impacts of Project construction, the Draft EIR conservatively assumed that all equipment would be operating simultaneously at the closest location to the sensitive receptor. Although Project Design Feature NOI-PDF-1 would ensure that construction equipment would have proper noise muffling devices, as shown on page IV.E-27 in Table IV.E-11, *Construction Noise Impacts*, receptor locations R1, R2, R4, R5 and R6 would experience noise levels above the significance criteria of 5 dBA above ambient noise levels for construction activities lasting longer than 10 days in a three-month period. The assumptions used to estimate the noise levels represent the worst-case noise scenario because construction activities would typically be spread out through the Project Site, that is, would not all be located at the closest location to the sensitive receptor, and would be periodic rather than constant as assumed in the noise modeling calculations contained in Appendix E of the Draft EIR. Nonetheless, using this conservative analysis, the Draft EIR concluded that the estimated construction-related noise would exceed the significance threshold by a range of 1.8 dBA at receptor location R4 to up to 10.7 dBA at receptor locations R1 and R5, without implementation of mitigation measures.

As explained on pages IV.E-41 through IV.E-43 in Section VI.E, Noise, of the Draft EIR, and shown on page IV.E-43, Table IV.E-21, *Construction Noise Impacts With Mitigation Measures*, of the Draft EIR, even with implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers), the noise levels from on-site construction activities at receptor locations R1, R2, R4, R5 and R6 would exceed the level of significance for noise impacts. As further discussed therein, implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by on-site construction activities at the off-site sensitive uses, by a minimum 11 dBA at the residential uses on east side of Grand Avenue (receptor location R1) and on the south side of 8th Street (receptor location R5), and by 6 dBA at the residential uses at the southwest corner of 8th Street and Hope Street (receptor location R6). The specified sound barriers along the Project Site's eastern and southern boundaries would also reduce the construction-related noise levels at the residential use at the southwest corner of 8th Street and Olive Street (receptor location R2) and at the residential use on Grand Avenue (receptor location R4) by minimum 5 dBA.

However, the temporary sound barriers would not be effective in reducing the construction-related noise levels for the upper levels of the residential buildings at the receptor locations, including the seven-story apartment building at receptor location R1, the 33-story apartment building at receptor location R2, the 9-story apartment building at receptor location R4, the 24-story apartment building at receptor location R5, and the 22-story apartment building at receptor location R6. As explained on page IV.E-42 of the Draft

EIR, in order to be effective, the temporary noise barrier would need to be as high as the building which would not be feasible as it would be cost prohibitive and impractical. Other mitigation measures such as moveable noise barriers and modification to the construction equipment mix were considered. However, these were found to be infeasible because moveable noise barriers are generally limited in height, typically 6- to 8-feet high and are not practical in reducing noise associated with moveable construction equipment such as an excavator or bulldozer. With respect to the construction mix, as discussed in Section V, Alternatives, of the Draft EIR, reducing the number of construction equipment by 43 percent would reduce construction noise levels by up to approximately 2.8 dBA, which would not reduce the impacts at the upper levels of the sensitive receptors to a less than significant level. In addition, reducing the construction equipment would increase the overall construction duration and the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R5 that are located across the street from the Project Site), it would not be feasible to reduce the on-site construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. There are no other feasible mitigation measures to further reduce the construction noise at the upper levels of receptor locations R1, R2, R4, R5, and R6 to below the significance threshold. Therefore, even after implementation of Mitigation Measure NOI-MM-1, Project construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

Construction Vibration (human annoyance): As discussed on pages IV.E-46 through IV.E-48 and page IV.E-50 in Section IV.E, Noise, of the Draft EIR and shown in the calculations in Appendix E of the Draft EIR, on-site construction activities such as demolition and grading/excavation would result in short-term vibration impacts associated with human annoyance. As explained therein, the significance threshold for human annoyance from construction generated vibrations is 72 VdB. As shown on page IV.E-47, Table IV.E-23, *Construction Vibration Impacts – Human Annoyance*, at 72.2 VdB, only receptor location R5 would experience vibration levels from on-site construction activities that exceed the significance criteria for human annoyance. Therefore, vibration impacts from on-site construction activities related to human annoyance would be significant at receptor location R5 without mitigation.

In addition, as explained on page IV.E-47 through IV.E-48 of the Draft EIR, the estimated vibration levels generated by construction trucks traveling along the anticipated haul routes were analyzed assuming that they would be within 24 feet of sensitive uses along the truck route (residential and hotel uses). With this assumption, the estimated vibration levels could reach approximately 72.6 VdB periodically as trucks pass the sensitive receptors which would exceed the 72 VdB threshold for human annoyance. Thus, based on the estimated ground-borne vibration levels from construction delivery/haul trucks traveling the anticipated haul route(s), Project vibration impacts associated with human annoyance would be significant prior to mitigation.

However, the Draft EIR concluded that it would not be feasible to reduce the vibration levels from on- and off-site construction activities to a less-than-significant level. As explained on page IV.E-50, mitigation measures considered to reduce vibration impacts from on-site construction equipment included the installation of a wave barrier, which is typically a trench, or a thin wall made of sheet piles installed in the ground to disrupt the travel of the vibration waves. However, to be effective, the wave barrier must be very deep and long, is cost prohibitive for temporary applications such as construction and is,

therefore, infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Moreover, for off-site construction truck vibration impacts, it would be infeasible to construct wave barriers in the public right-of-way, and conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. As such, there are no feasible mitigation measures to reduce the Project's potential vibration impacts associated with human annoyance from on- and off-site construction activities, and impacts would remain significant and unavoidable.

Cumulative Impacts (on-site and off-site construction noise and off-site construction vibration – human annoyance): As discussed on pages IV.E-51 through IV.E-54 and IV.E-58 through IV.E-60 of the Draft EIR, combined noise associated with construction are generally limited to projects that are in close proximity to the sensitive receptors. As explained therein, of the 74 Related Projects identified in the Draft EIR, seven are within 1,000 feet of the Project Site and of those seven, only Related Project No. 10 and Related Project No. 30 are sufficiently close to the Project Site and the sensitive receptors to have a potential to result in cumulative noise impacts from on-site construction activities. As such, should construction of the Project and these Related Projects overlap, there is a potential that the combined noise would be significant. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through a mitigation measure similar to Mitigation Measure NOI-MM-1 (e.g., providing temporary noise barriers) for each individual related project. While Mitigation Measure NOI-MM-1 would reduce the Project's contribution to on-site cumulative noise to the extent feasible, even with this type of mitigation measure applied to the Related Projects and compliance with LAMC noise regulations, cumulative noise impacts would continue to occur. For the reasons described above, there are no other physical mitigation measures that would be feasible to further reduce noise impacts at the upper levels of the noise sensitive receptor locations. As such, even with implementation of Mitigation Measure NOI-MM-1, and a similar measure for the Related Projects, cumulative noise impacts from on-site construction activities would remain significant and unavoidable.

As discussed on pages IV.E-53 through IV.E-59 in Section IV.E, Noise, of the Draft EIR, as to off-site construction noise impacts, based on the Related Projects in the vicinity of the Project Site and their likely truck routes, cumulative noise due to construction truck traffic from the Project and Related Projects with overlapping construction schedules has the potential to increase the ambient noise levels along the haul truck route by the significance threshold of 5 dBA above ambient noise levels. Specifically, if the total number of trucks from the Project and Related Projects were to add up to 52 truck trips per hour along 8th Street, 35 truck trips along James M. Wood Boulevard/9th Street, and 45 truck trips along Olive Street, the estimated noise level of the truck trips plus the ambient noise would increase the ambient noise levels by 5 dBA or above and, therefore, exceed the significance criteria. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks, and such noise impacts would remain significant and unavoidable.

In addition, as related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated haul routes. Therefore, to the extent that other Related Projects use the same haul route as the Project, potential cumulative vibration impacts associated with human annoyance associated with temporary and intermittent vibration off-site from construction haul trucks traveling along the designated haul route(s) would be significant and unavoidable.

6) Reference: For a complete discussion of noise impacts, including ground-borne vibration impacts related to human annoyance, please see Section IV.E, Noise, and Appendix E, of the Draft EIR.

VIII. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis from Section V, Alternatives, of the Draft EIR, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or additional mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

An important consideration in the analysis of alternatives to the Project is the degree to which such alternatives would achieve the objectives of the Project. Pursuant to CEQA Guidelines Section 15124(b), Chapter II, Project Description, of the Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency as well as the underlying purpose of the Project. The underlying purpose of the Project is to develop a parcel with a high-quality mixed-use development that provides both new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability. The specific objectives of the Project are as follows:

- To maximize new housing units on a site currently used for automobile parking to help address the demand for new housing in the region, the City of Los Angeles, and the Central City Community Plan area.
- To provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity.

- To create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses.
- To construct a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections (“complete” streets).
- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.
- To contribute to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses.

Alternatives Analyzed

Alternative 1—No Project/No Build Alternative

Description of Alternative

As discussed on page V-18 in Chapter V, Alternatives, of the Draft EIR, the No Project/No Build Alternative (Alternative 1) assumes that the Project would not be approved, and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The existing surface parking lot and four-story parking structure would remain and continue to operate on the Project Site, and no new construction would occur.

Impact Summary

As discussed on pages V-18 through V-24 and V-95 in Chapter V, Alternatives, of the Draft EIR, Alternative 1 would avoid all of the Project’s significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. However, Alternative 1 would not meet any of the Project objectives or the Project’s underlying purpose to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

Rationale for Finding

As discussed on pages V-18 through V-24 in Chapter V, Alternatives, of the Draft EIR, under Alternative 1 the existing parking structure and surface parking lot would remain on the Project Site, and no new development would occur. As such, as discussed therein and as shown on pages V-11 through V-15 in Table V-2, *Comparison of Impacts Associated with the Project and Impacts of the Alternatives*, in Chapter V, Alternatives, of the Draft EIR, Alternative 1 would avoid all of the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. However, as discussed on pages V-25 through V-26 and V-95 of the Draft EIR, Alternative 1 would not meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability. In addition, Alternative 1 would not achieve any of the Project objectives, in part because it would not provide any housing or community serving commercial uses or create new construction and commercial jobs, nor would it promote walkability, smart growth, or the regional and local mobility objectives of locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.

Reference

For a complete discussion of impacts associated with Alternative 1, please see Chapter V, Alternatives, of the Draft EIR.

Alternative 2— Hotel with Ground Floor Commercial Alternative

Description of Alternative

As described on pages V-27 through V-28 in Chapter V, Alternatives, of the Draft EIR, the Hotel with Ground Floor Commercial Alternative (Alternative 2) would include a reduced development project comprised of a 22-story high-rise building with a maximum height of 292 feet which would include 375 hotel rooms and 10,499 square feet of ground floor commercial/retail/restaurant uses. Alternative 2 would include 274 vehicle parking spaces on four levels, including two subterranean levels and two above-ground levels (with 34 of the spaces provided pursuant to covenanted and recorded parking agreements for an off-site use) and 42 short-term and 42 long-term bicycle parking spaces. The ground floor would include the hotel lobby and 7,499 square feet of commercial/retail/restaurant uses. The hotel would include indoor and outdoor recreational amenities for hotel guests including a landscaped amenity deck and, on level 22, 3,000 square feet of restaurant uses. Alternative 2 would implement a similar overall building design, signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Overall, the new building under Alternative 2 would comprise 312,111 square feet of floor area, of which 104,037 square feet of floor area would be requested through a Transfer of Floor Area (TFAR). As such, Alternative 2 would provide a total FAR of 9:1. To accommodate Alternative 2, the existing surface parking lot and four-story parking structure would be demolished.

As further discussed therein, the overall duration of construction would be reduced compared to the Project based on Alternative 2 being a smaller project with a shorter tower, and less excavation with one less subterranean level. As with the Project, Alternative 2 would implement a Construction Management Plan and Worksite Traffic Control Plan during construction to minimize potential conflicts between construction activity, through traffic, and emergency access. As with the Project, the Construction Management Plan and Worksite Traffic Control Plan would be subject to LADOT review and approval.

Impact Summary

As discussed on pages V-28 through V-50 in Chapter V, Alternatives, of the Draft EIR, although Alternative 2 would be a smaller project with less excavation as a result of one less level of subterranean parking, Alternative 2 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. Additionally, as further discussed therein, the following impacts under Alternative 2 would be less than significant but greater when compared to the less-than-significant impacts of the Project: potential toxic air contaminant impacts during operation; energy use during operation, GHG emissions, and VMT. All other impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

As discussed on pages V-27 through V-28 in Chapter V, Alternatives, of the Draft EIR, Alternative 2 would develop the Project Site with a hotel that includes ground floor commercial/restaurant/retail uses. As discussed on pages V-28 through V-49, and as shown on pages V-11 through V-15 in Table V-2, *Comparison of Impacts Associated with the Project and Impacts of the Alternatives*, in Chapter V, Alternatives, of the Draft EIR, most of Alternative 2's impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project except for the following impacts which would be less than significant but greater when compared to the less-than-significant impacts of the Project due to the change from housing to hotel uses: potential toxic air contaminant impacts during operation; energy use during operation, GHG emissions, and VMT.

Moreover, as discussed on pages V-37 through V-38 in Chapter V, Alternatives, of the Draft EIR, Alternative 2 would not reduce the Project's significant and unavoidable construction noise and vibration impacts to a less than significant level. As explained

therein, the types of construction activities under Alternative 2 would be similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area (approximately 41 percent less floor area) and elimination of one subterranean level. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. However, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 2 and the Project because: (i) Alternative 2 would include a similar site plan and includes subterranean parking; (ii) both Alternative 2 and the Project would be developed on the same Project Site and within the same distances to off-site sensitive receptors; (iii) both Alternative 2 and the Project would require the same mix of construction equipment; (iv) both Alternative 2 and the Project would implement the same construction-related project noise design features, including Project Design Features NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (v) both Alternative 2 and the Project would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier, along the eastern, southern, and western property lines, during the construction period). Therefore, the estimated noise levels during Alternative 2 construction would be similar to the Project which would exceed the significance criteria at off-site receptor locations, R1, R2, R4, R5 and R6 to the same extent as the Project. Similar to the Project, implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at the ground level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels at these receptor locations due to the height of the residential buildings (ranging from seven stories to 33 stories). Thus, like the Project, as impacts are based on peak construction days, impacts would be similar to those of the Project and therefore, Alternative 2 would result in significant unavoidable on-site construction noise impacts (both project-level and cumulative), less-than-significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative), although the impacts would occur for a shorter duration.

Similarly, as discussed on page V-39 in Chapter V, Alternatives, of the Draft EIR, while the overall amount of construction would be reduced, Alternative 2's on- and off-site construction activities and the associated construction vibration levels would be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, like the Project, the estimated ground-borne vibration levels at the sensitive receptors at receptor location R5 due to on-site construction equipment and along the anticipated haul routes (8th Street, James M. Wood Boulevard/9th Street, and Olive Street) due to off-site construction trucks, would result in a significant impact related to human annoyance. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts for Alternative 2 and, therefore, Alternative 2 project-level and cumulative vibration impacts associated with human annoyance from construction would be similar to the Project and would remain significant and unavoidable, although the impacts would occur for a shorter duration.

As discussed on pages V-50 through V-51 in Chapter V, Alternatives, of the Draft EIR, with the provision of hotel uses and elimination of the proposed residential uses, Alternative 2 would not fully meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability. In

addition, Alternative 2 would not meet the Project objectives of maximizing housing units to help address the demand for new housing in the region, the City, and the Central City Community Plan area, and it would only partially meet the objectives of reducing vehicular trips and promoting regional and local mobility objectives by locating high-density uses in an area with a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station), contributing to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses, and constructing a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections (“complete” streets). Although Alternative 2 would meet the remaining two objectives of the Project to provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity and to create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses, as a whole, Alternative 2 would not meet the underlying purpose and Project objectives to the same degree as the Project.

Reference

For a complete discussion of impacts associated with Alternative 2, please see Chapter V, Alternatives, of the Draft EIR.

Alternative 3—Development in Accordance with Existing Base FAR (Reduced Residential Alternative)

Description of Alternative

As discussed on pages V-52 through V-53 in Chapter V, Alternatives, of the Draft EIR, the Development in Accordance with Existing Base FAR (Reduced Residential) Alternative (Alternative 3), would include a reduced density project developed pursuant to the existing zoning designations, height limits, and base 6:1 FAR. Alternative 3 would be comprised of a 23-story high-rise mixed-use building with a maximum height of 288 feet consisting of 228 residential units and 7,499 square feet of ground floor commercial/retail/restaurant uses, with 285 vehicle parking spaces on five levels, including two subterranean levels and three above-ground levels, (which would include 34 spaces provided pursuant to covenanted and recorded parking agreements for off-site use), and 17 short-term and 136 long-term bicycle parking spaces. Overall, the new building would comprise 208,074 square feet of floor area, which would correspond to the maximum area (208,074 square feet) allowed on-site. Additionally Alternative 3 would provide the same ground floor plan and design as the Project, including the commercial/retail/restaurant uses and residential lobby, internal porte cochère, and driveways along Hope Street and Grand Avenue, and indoor and outdoor open space and recreational amenities for residents, including a landscaped amenity deck. Alternative 3 would also implement the same above-grade parking design, signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. To accommodate Alternative 3, the existing surface parking lot and four-story parking structure would be demolished.

As further discussed therein, the overall duration of construction would be reduced compared to the Project due to Alternative 3 being a smaller project with a shorter tower

and less excavation with one less subterranean level. As with the Project, Alternative 3 would implement a Construction Management Plan and Worksite Traffic Control Plan during construction to minimize potential conflicts between construction activity, through traffic, and emergency access. As with the Project, the Construction Management Plan and Worksite Traffic Control Plan would be subject to LADOT review and approval.

Impact Summary

As discussed on pages V-54 through V-71 in Chapter V, Alternatives, of the Draft EIR, although Alternative 3 would be a smaller project with less excavation as a result of one less level of subterranean parking, Alternative 3 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. All other impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

As discussed on pages V-52 through V-53 in Chapter V, Alternatives, of the Draft EIR, Alternative 3 would develop a mixed-use housing project with ground-floor commercial/restaurant/retail uses. As discussed on pages V-54 through V-71, and as shown on pages V-11 through V-15 in Table V-2, *Comparison of Impacts Associated with the Project and Impacts of the Alternatives*, in Chapter V, Alternatives, of the Draft EIR, most of Alternative 3's impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project. However, as discussed on page V-71 of the Draft EIR, even though Alternative 3 would be a smaller project with less excavation, Alternative 3 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic, although these impacts would occur for a shorter duration than under the Project.

As discussed on pages V-59 through V-60 in Chapter V, Alternatives, of the Draft EIR, the types of construction activities under Alternative 3 would be similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area (approximately 61 percent less floor area) and elimination of one level of subterranean parking. However, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 3 and the Project because: (i) Alternative 3 would include a similar footprint and includes subterranean parking; (ii) both Alternative 3 and the Project

would be developed on the same Project Site and within the same distances to off-site sensitive receptors; (iii) both Alternative 3 and the Project would require the same mix of construction equipment; (iv) both Alternative 3 and the Project would implement the same construction-related project noise design features, including Project Design Features NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (v) both Alternative 3 and the Project would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier, along the eastern, southern and western property lines, during the construction period). Therefore, the estimated noise levels during Alternative 3 construction would be similar to the Project which would exceed the significance criteria at off-site receptor locations R1, R2, R4, R5 and R6. Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at the ground level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels at these receptor locations due to the height of the residential buildings (ranging from seven stories to 33 stories). Thus, like the Project, Alternative 3 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative), although these impacts would occur for a shorter duration than under the Project.

Similarly, as discussed on page V-61 in Chapter V, Alternatives, of the Draft EIR, the types of construction activities under Alternative 3 would be similar to the Project. While overall the amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, like the Project, the estimated ground-borne vibration levels at receptor location R5 due to on-site construction equipment and at the sensitive receptors along the anticipated haul routes (8th Street, James M. Wood Boulevard/9th Street, and Olive Street) due to off-site construction trucks, would result in a significant impact related to human annoyance. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts for Alternative 3 and, therefore, Alternative 3 project-level and cumulative vibration impacts associated with human annoyance from construction would be similar to the Project and would remain significant and unavoidable, although these impacts would occur for a shorter duration than under the Project.

As discussed on pages V-71 through V-72 in Chapter V, Alternatives, of the Draft EIR, Alternative 3 would provide the same mix of uses as the Project but at a reduced scope and density. As such, Alternative 3 would meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability. However, due to the reduction in residential units, Alternative 3 would not fully achieve the Project's objectives to the same extent as the Project with regards to maximizing new housing units to help address the demand for new housing in the region, the City, and the Central City Community Plan area; constructing a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections ("complete" streets); reducing vehicular trips and promoting regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services;

and contributing to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses. With development of similar, although reduced, uses as the Project, Alternative 3 would meet the remaining two Project objectives of providing a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity, and creating a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses. However, as a whole, Alternative 3 would not meet the underlying purpose and Project objectives to the same degree as the Project.

Reference

For a complete discussion of impacts associated with Alternative 3, please see Chapter V, Alternatives, of the Draft EIR.

Alternative 4—Development in Accordance with DTLA 2040 Plan Alternative

Description of Alternative

The Development in Accordance with DTLA 2040 Plan Alternative (Alternative 4) would develop the same types of uses as the Project but would comply with the proposed draft zoning for the Project Site under the DTLA 2040 Community Plan Update (DTLA 2040 Plan), resulting in less housing units. Under the current draft of the DTLA 2040 Plan, the Project Site is proposed to be designated as part of the Transit Core, which would allow a maximum FAR of between 9:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.

Alternative 4 would develop a 29-story high-rise building with a maximum height of 372 feet, consisting of 290 residential units, up to 7,499 square feet of ground floor commercial/retail/restaurant uses, and 56,874 square feet of above-grade parking (that would be counted towards the FAR per the draft DTLA 2040 Plan). Overall, Alternative 4 would comprise 312,111 square feet of floor area resulting in an FAR of 9:1. Alternative 4 would include 304 vehicle parking spaces (including 34 vehicle parking spaces per covenanted and recorded parking agreements for an off-site use) within six parking levels, including three subterranean and three above-ground levels, and 20 short-term and 152 long-term bicycle parking spaces. Alternative 4 would provide the same ground floor plan and design as the Project, including the commercial/retail/restaurant uses and residential lobby, internal porte cochère, and driveways along Hope Street and Grand Avenue. Similar to the Project, Alternative 4 would include four above-ground tiers with varying stepbacks from Hope Street, and amenity decks which would be located on the upper level of each tier. Open space would be provided in accordance with the DTLA 2040 Plan within the amenity decks. Alternative 4 would implement the same signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Similar to the Project, to accommodate Alternative 4, the existing surface parking lot and four-story parking structure would be demolished.

As further discussed therein, overall duration of construction of Alternative 4 would be reduced compared to that of the Project based on Alternative 4 being a smaller project with a shorter tower (although it would include the same amount of excavation with the same number of subterranean levels). As with the Project, Alternative 4 would implement

a Construction Management Plan and Worksite Traffic Control Plan during construction to minimize potential conflicts between construction activity, through traffic, and emergency access. As with the Project, the Construction Management Plan and Worksite Traffic Control Plan would be subject to LADOT review and approval.

Impact Summary

As discussed on pages V-75 through V-93 in Chapter V, Alternatives, of the Draft EIR, although Alternative 4 would be a smaller project, Alternative 4 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. All other impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

As discussed on pages V-73 through V-75 in Chapter V, Alternatives, of the Draft EIR, Alternative 4 would develop a mixed-use housing project with ground-floor commercial/restaurant/retail uses. As discussed on pages V-75 through V-93, and as shown on pages V-11 through V-15 in Table V-2, *Comparison of Impacts Associated with the Project and Impacts of the Alternatives*, in Chapter V, Alternatives, of the Draft EIR, Alternative 4's impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project. However, as discussed on page 93, even though Alternative 4 would be a smaller project, Alternative 4 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

As discussed on pages V-81 through V-82 in Chapter V, Alternatives, of the Draft EIR, the types of construction activities under Alternative 4 would be similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area (approximately 41 percent less floor area). As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. However, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 4 and the Project because: (i) Alternative 4 would include a similar site plan and number of subterranean parking levels as the Project; (ii) both Alternative 4 and the Project would be developed

on the same Project Site, with similar building footprints, and within the same distances to off-site sensitive receptors; (iii) both Alternative 4 and the Project would require the same mix of construction equipment; (iv) both Alternative 4 and the Project would implement the same construction-related project noise design features, including Project Design Features NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (v) both Alternate 4 and the Project would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier, along the eastern, southern and western property lines, during the construction period). Therefore, the estimated noise levels during Alternative 4 construction would be similar to the Project, which would exceed the significance criteria at off-site receptor locations R1, R2, R4, R5 and R6. Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at the ground level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels at these receptor locations due to the height of the residential buildings (ranging from seven stories to 33 stories). Thus, like the Project, Alternative 4 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative), although such impacts would occur for a shorter duration compared to the Project.

Similarly, as discussed on page V-83 in Chapter V, Alternatives, of the Draft EIR, the types of construction activities under Alternative 4 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 4 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, similar to the Project, vibration levels at receptor location R5 due to on-site construction equipment and along the anticipated haul routes (8th Street, James M. Wood Boulevard/9th Street, and Olive Street) due to off-site construction trucks, would result in a significant impact related to human annoyance. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts. As such, vibration impacts associated with human annoyance from off-site construction would be significant and unavoidable, although such impacts would occur for a shorter duration compared to the Project.

As discussed on pages V-93 through V-94 in Chapter V, Alternatives, of the Draft EIR, Alternative 4 would provide the same mix of uses as the Project but at a reduced scope and density in accordance with the draft proposed DTLA 2040 Plan. As such, Alternative 4 would meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability. However, due to the reduction in residential units, Alternative 4 would not fully achieve the Project objectives to the same extent as the Project with respect to maximizing new housing units to help address the demand for new housing in the region, the City, and the Central City Community Plan area; constructing a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections ("complete" streets); reducing vehicular trips and promoting regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a

high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services; and, contributing economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses. With development of similar, although reduced, uses as the Project, Alternative 4 would meet the Project objectives of providing a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity, and creating a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses. However, as a whole, Alternative 4 would not meet the underlying purpose and Project objectives to the same degree as the Project.

Reference

For a complete discussion of impacts associated with Alternative 4, please see Chapter V, Alternatives, of the Draft environmental impact report.

Alternatives Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include the following:

Alternative Project Site: As discussed on pages V-5 through V-6 in Chapter V, Alternatives, of the Draft EIR, the Project Applicant already owns the Project Site, and its location is conducive to the development of an infill mixed-use project as it is located in downtown Los Angeles within two blocks of the Metro 7th Street/Metro Center Station, which is a regional-serving transit hub. The Project Site is particularly suitable for development of a mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serve the community and provide opportunities for walkability due to the Project Site's proximity to existing residential and commercial uses and various modes of public transportation. Furthermore, it is not expected that the Project Applicant can reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Moreover, if an alternative site in the downtown Los Angeles area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with on-site construction noise and on- and off-site vibration (associated with human annoyance) due to short-term construction activities would also occur since a potential alternative site would also likely be an infill site with nearby sensitive receptors, and since the noise and vibration levels associated with on- and off-site construction activities would be similar to the Project and evaluated on maximum (peak) levels. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction: As discussed in Section IV.E, Noise, of the Draft EIR, Project construction

activities would result in significant unavoidable construction-related noise impacts related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. As discussed on pages V-6 through V-9 in Chapter V, Alternatives, of the Draft EIR, the following approaches were considered, but rejected as infeasible, to substantially reduce or avoid these impacts:

Approach (a) - Extended Construction Duration with Reduced Construction Equipment: This approach would use less construction equipment each day, which would extend the construction period, as compared to the Project. This approach was rejected for the following reasons:

- Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). With respect to on-site construction, even with implementation of the Project's noise mitigation measures, reducing the on-site construction equipment by 43 percent, from seven pieces to four pieces of equipment, construction noise levels would still exceed the significance thresholds at the upper levels of five of the sensitive receptor locations. As such, on-site construction noise levels under this approach would be less than the Project but would still exceed the significance threshold. In addition, the 43 percent reduction would be less than 3.0 dBA, which is the level where noise is perceptible and would also increase the number of days that sensitive receptors would be significantly impacted by construction activities, as well as being inefficient. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R5 that are located across the street from the Project Site), it would not be feasible to reduce the on-site construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. Additionally, as analyzed in Section IV.E Noise, cumulative off-site construction noise impacts would occur if the total truck trips per hour along 8th Street, James M. Wood Boulevard/9th Street, and Olive Street would add up to 52, 35, and 45 truck trips per hour, respectively. Related Project No. 10 would generate up to 50 truck trips per hour along 8th Street and 9th Street. Therefore, even when reducing the number of haul trips by half (from 19 to 10 truck trips per hour), the Project would continue to contribute to a potential cumulative impact associated with off-site construction noise. Additionally, reducing the construction truck trips per hour would extend the demolition period since there will be fewer trucks removing on-site demolition debris. The longer demolition period would extend the duration of the human annoyance from off-site construction traffic. As such, the on-site noise impacts under this approach would not be substantially less than the Project and would remain significant and unavoidable for the on-site construction activities and the cumulative off-site construction noise levels.
- Off-site construction vibration impacts (associated with human annoyance) are based on the peak levels generated by the individual heavy trucks traveling by sensitive receptors. Although the number of truck trips per day would be reduced under this approach, the peak vibration levels would be the same as for the Project. Therefore, vibration impacts associated with human annoyance would also continue to be significant and unavoidable, similar to the Project and for a longer duration.

Approach (b) - Central Location of Development: An approach where proposed development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected for the following reasons:

- Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment since noise levels from construction equipment attenuate approximately 6 dBA per doubling of distance. While the construction noise levels associated with the building phases for the proposed building placed closer to the center of the Project Site would be lower than the Project, the noise level reduction, depending upon the setback from the property line, would be limited due to the size of the Project Site (approximately 111 feet by 342 feet). Specifically, moving the building footprint an additional 30 feet toward the center of the Project Site would reduce the noise construction levels at the sensitive receptor locations less than 3.0 dBA and would still exceed the significance thresholds at the upper levels of the buildings even with mitigation measures. In addition, noise levels during site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be up to the property line, and noise impacts at receptor locations R1, R2, R4, R5 and R6 would remain significant and similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant and unavoidable as with the Project. In addition, even if development were to be limited to the surface parking area (i.e., the existing parking structure would be retained), significant and unavoidable impacts would remain given the continued close proximity of construction activities to adjacent sensitive receptors.
- The number of trucks would be similar to the Project and, therefore, the off-site construction vibration impacts (associated with human annoyance) of this option due to heavy trucks traveling by sensitive receptors would be significant and unavoidable since heavy trucks would still have to travel by the same routes as under the Project.

Approach (c) - Reduced Development: An approach where the amount of development is reduced to the extent that the significant construction-related noise and vibration impacts of the Project would be reduced was reviewed and rejected for the following reasons:

- Similar to Approach (a), reducing the number of construction equipment (even by up to 43 percent) would not reduce construction noise to a less-than-significant level and as discussed under Approach (b), due to the close proximity of the sensitive receptors and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be feasible to mitigate the on-site construction noise impacts of the Project, especially at receptor locations R1 and R5 (across from the Project Site). In addition, even for a reduced development approach, noise levels during site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be up to the property line, and noise impacts at receptor locations R1, R2, R4, R5 and R6 would remain significant, similar to the Project.
- Off-site construction vibration impacts (associated with human annoyance), due to heavy trucks traveling by sensitive receptors, would also be significant and

unavoidable, similar to the Project, as vibration impacts are based on the peak levels generated by individual heavy trucks traveling by sensitive receptors.

Therefore, as explained on page V-9 in Chapter V, Alternatives, of the Draft EIR, because of the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities, none of the above approaches considered and rejected would substantially reduce or avoid the significant unavoidable construction-related on-site and cumulative off-site noise and off-site vibration (associated with human annoyance) impacts of the Project. Moreover, while the duration of impact does not change the measurement of noise or vibration impact level, extending the duration of construction would result in significant impacts to sensitive receptors for a longer period of time. Therefore, an alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project and would extend the duration of the impacts, as such, no further consideration of these approaches in the EIR was warranted.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

As discussed on pages V-95 through V-96 in Chapter V, Alternatives, of the Draft EIR, of the four alternatives analyzed, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project’s significant and unavoidable environmental impacts. However, Alternative 1 would not meet any of the Project objectives or the Project’s underlying purpose to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability. Therefore, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining Alternatives indicates that Alternative 3, the Development in Accordance with Existing Base FAR (Reduced Residential) Alternative, is the Environmentally Superior Alternative. As further discussed therein, while Alternative 3 would not eliminate the Project’s significant and unavoidable impacts it would result in the greatest overall reduction in the extent of impacts when compared to the Project’s impacts, and would reduce the duration during which the significant impacts would occur. Overall, with the reduction in residential units, Alternative 3 would partially achieve the Project’s objectives, but would not meet the underlying purpose of the Project or satisfy the Project objectives to the same extent as the Project.

IX. Other CEQA Considerations

Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the Project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the Project and would continue

throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. The Project Site contains no energy resources that would be precluded from future use through Project implementation. For the reasons set forth in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

Building Materials and Solid Waste

As discussed on page VI-7 in Chapter VI, Other CEQA Considerations, of the Draft EIR, construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable, such as certain types of lumber and other forest products, aggregate materials used in concrete and asphalt, metals, and petrochemical construction materials. However, as further discussed below, the Project would adhere to State and local solid waste policies and regulations that further goals to divert waste which will ensure that the Project's consumption of non-renewable building materials such as aggregate materials and plastics would be reduced. Additionally, the use of these materials would not occur in an inefficient or wasteful manner given that, as discussed in Section IV.C, Greenhouse Gas Emissions, of the Draft EIR, Project construction would adhere to the sustainability requirements of Title 24, the Los Angeles Green Building Code, and CALGreen, as well as those required to meet the standards to achieve LEED Green certification or its equivalent as required by Project Design Feature GHG-PDF-1. Thus, although the Project would involve the use of nonrenewable and slowly renewable resources, the consumption would occur in accordance with the existing State and local regulations that govern the use of such materials and resources.

Also, as discussed on pages 83 through 87 of the Initial Study included in Appendix A of the Draft EIR and pages VI-7 and VI-35 through VI-38 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project would generate solid waste during construction and operation. However, it would not generate waste in an inefficient or wasteful manner, in that it would comply with all regulations regarding diversion of solid waste. As discussed therein, pursuant to the requirements of Senate Bill (SB) 1374, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area for Project residents to facilitate recycling in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. With such compliance the consumption of non-renewable building materials would be reduced. Additionally, as discussed on pages VI-35 through VI-38, the amount of construction and debris waste which the Project would generate after compliance with diversion regulations would represent approximately 0.008 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity and the amount which would be generated during Project operation would represent approximately 0.001 percent of the remaining capacity for the County's Class III landfills open to the City. Thus, available landfills would be able to accommodate Project-generated solid waste.

Water

As discussed on pages VI-7 through VI-8 in Chapter VI, Other CEQA Considerations, of the Draft EIR, water consumption during construction and operation of the Project is addressed in Section IV.I.1, Utilities and Service Systems - Water Supply and Infrastructure, of the Draft EIR. As evaluated therein, given the temporary nature of construction activities and the short-term and intermittent water use during construction, the Project would not be consuming large amounts of water nor consuming more water than available for supply by the LADWP. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the LADWP, as confirmed by the Water Supply Assessment (WSA) prepared for the Project and included as Appendix I of the Draft EIR. In addition, the Project would implement a variety of sustainable features related to water conservation to reduce water use in accordance with the City's Green Building Code and Project Design Feature GHG-PDF-1 (sustainability requirements including water efficiency measures) and implementing water conservation measures in excess of code requirements pursuant to Project Design Feature WAT-PDF-1. As further indicated therein, the LADWP would be able to meet the Project's water demand, in addition to meeting the existing and planned water demands of its service area. Thus, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

Energy Consumption

As discussed on pages VI-8 through IV-9 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project would primarily use non-renewable fossil fuels as an energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.B, Energy, of the Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. However, such fuel consumption would represent only approximately 0.002 percent of the 2022 annual on-road gasoline-related energy consumption and 0.02 percent of the 2022 annual diesel fuel-related energy consumption in Los Angeles County. Furthermore, as detailed in Section IV.B, Energy, of the Draft EIR, during construction, electric equipment would be powered off when not in use so as to avoid unnecessary energy consumption, and trucks and equipment would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources during construction.

During operation, the Project's electricity and natural gas demand would represent 0.02 and 0.0005 percent, respectively, of LADWP and SoCalGas' projected sales in 2025 and, therefore, the Project's increase in electricity and natural gas demand would be within the service capabilities of those service providers. In addition, as discussed in Section IV.B, Energy, of the Draft EIR, the Project would comply with Title 24 standards and applicable CALGreen requirements which would reduce energy consumption. Further, transportation fuel usage during Project operational activities would represent approximately 0.002 percent of gasoline and diesel usage within Los Angeles County. Additionally, Project operations would not conflict with adopted energy conservation plans and the Project,

which is located in an HQTAs and TPAs, includes a number of features that would reduce VMT, such as increased density, a mixed-use development, and transit accessibility, all of which would reduce energy consumption and associated air quality emissions.

Environmental Hazards

As discussed on page VI-9 in Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project's potential use of hazardous materials is addressed in the Initial Study for the Project, which is included as Appendix A of the Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in residential and commercial developments, including construction related use of fuels, paints, oils and transmission fluids and operation related cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations.

Therefore, although the Project would result in irreversible environmental changes and would use, store and dispose of hazardous materials, such changes and use would be less than significant, and the limited nonrenewable resources and hazardous materials that would be required by Project construction and operation is justified to meet the City's and State's housing, transportation, and GHG policies.

Potential Secondary Effects of Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

Cultural Resources (Archaeological Resources)

Mitigation Measure CUL-MM-1 included in the Initial Study provided in Appendix A of the Draft EIR states prior to the start of ground-disturbing activities, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to carry out the following measure. A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning.

Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. This mitigation measure represents procedural actions and would be beneficial in protecting archaeological resources that could potentially be encountered on site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Geology and Soils (Paleontological Resources)

Mitigation Measure GEO-MM-1 included in the Initial Study provided in Appendix A of the Draft EIR states that a qualified paleontologist would be retained to perform periodic inspections of excavation and grading activities. In the event that paleontological materials are encountered, the qualified paleontologist would temporarily halt development activity to assess and evaluate the discovered material(s). The certified paleontologist would provide recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. This mitigation measure represents procedural actions and would be beneficial in protecting paleontological resources that could potentially be encountered on site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Noise and Vibration

As discussed in detail in Section IV.E, Noise, of the Draft EIR, Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction along: the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Grand Avenue; the southern property line of the Project Site between the construction areas and residential uses across the Project Site to the south; and the western property line of the Project Site between the construction areas and residential uses at the southwest corner of 8th Street and Hope Street. The noise and vibration from installation of the temporary sound barrier would be short-term (i.e., would require one to two days) and would occur within the specified construction hours and days permitted by the City's noise regulations. Installation of the noise barriers would require limited digging or trenching. Thus, installation of the noise barriers would not require a large amount of construction equipment. In addition, noise levels associated with the sound barrier installation activities would be substantially less than the noise levels associated with other phases of construction. Upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in additional adverse impacts not already accounted for in Section IV.E, Noise of the Draft EIR.

Mitigation Measure NOI-MM-2 requires that prior to the start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the multi-story parking structures adjacent to the Project Site to the north to inspect and document the apparent physical condition of the structures' readily visible features. The inspection survey shall be made to the extent feasible from the public right-of-way and within the Project Site's property line. The Applicant shall also retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at property line of the parking structure adjacent to the Project Site to the north during demolition and grading/excavation phases. In the event the warning level is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited

to halting/staggering concurrent activities and utilizing lower vibratory techniques. In the event the regulatory level is triggered, the contractor shall halt the construction activities in the vicinity of the parking structure and visually inspect the building for any damage. The inspection would occur from the public right of way or within the Project Site's property line to the extent feasible. Results of the inspection must be logged, and repairs will be provided in the event any damage occurred. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is measured and below the warning level. This measure involves supervisorial, inspection and monitoring activities along with use of light monitoring equipment. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth, or increases in the population which may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Additionally, consideration must be given to characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

As discussed on pages VI-10 through VI-13 of Chapter VI, Other CEQA Considerations, of the Draft EIR, while the Project would include new development and directly generate new residents and employees, the Project would not result in significant growth-inducing impacts because: (i) the Project would be consistent with the SCAG growth forecast since the estimated 1,398 new residents generated by the Project would represent approximately 0.81 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2025 and the Project's 30 estimated new employees would represent approximately 0.05 percent of the employment growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2025; (ii) as an urban, infill Project within an HQTAs and TPAs, the Project would be consistent with regional and City policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT; (iii) the Project would not extend roads or utility infrastructure to an area not already served by such roads and utility infrastructure nor open any large undeveloped areas for new use; and (iv) any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Furthermore, while the Project could potentially generate some indirect population and employee growth, any such growth would not be substantial given that Project workers would not be expected to move from outside the area for the Project's construction and operational jobs, and the Project would provide new housing which could potentially satisfy any indirect housing demand associated with this growth. Therefore, direct and indirect growth-inducing impacts would be less than significant.

X. Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis provided in Chapter IV, Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction activities; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the Project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City hereby finds that each of the Project's benefits, as listed below, outweigh and override the significant unavoidable impacts relating to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify approval of the Project and certification of the completed EIR. Each of the listed Project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the Project despite the Project's identified significant and unavoidable environmental impacts. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies approval of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

- **The Project Would Support Regional and City Land Use and Environmental Goals.** The underlying purpose of the Project is to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and commercial/retail/restaurant uses that serves the community and promotes walkability.

The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Central City Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's 2020–2045 RTP/SCS and the City's General Plan.

The Project includes features to support the goals of the 2020–2045 RTP/SCS that address improving the productivity of the region's transportation system and supporting an integrated regional development pattern and transportation network, reducing GHG emissions and improving air quality. Specifically, the Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including the Metro 7th Street/Metro Center rail station, six Rapid bus lines, three Express lines and 28 Local lines in the Project area. Additional transit lines include nine LADOT Commuter Express lines, five LADOT Downtown Area Short Hop (DASH) bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG HQTAs and City TPA, as defined in the City's Zoning Information File No. 2452 and PRC Section 21099. In addition, the Project would provide 251 bicycle parking spaces and would feature vehicle parking spaces equipped with electric vehicle (EV) charging stations as well as additional facilities capable of supporting future electric vehicle supply equipment (EVSE). As such, consistent with SCAG's goals and objectives, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking.

The Project would support objectives and policies of the General Plan Framework Element's (Framework Element) Land Use Chapter. The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by replacing a parking structure and surface parking lot with a contemporary high-rise development with 580 residential units and up to 7,499 square feet of ground floor, neighborhood-serving commercial/retail/restaurant uses. As such, the Project would create additional housing to meet a growing demand in Downtown Los Angeles, provide short- and long-term employment opportunities, and would be consistent with the type of development that is envisioned for the area. In addition, the Project's mix of uses, sidewalk design and landscaping improvements in an area with convenient access to public transit and opportunities for walking and biking would promote a safe and improved pedestrian environment and facilitate a reduction of vehicle trips and VMT.

The Project would promote the City's goals, objectives, and policies of the Framework Element's Urban Form and Neighborhood Design Chapter by introducing a new mixed-use development that would activate the existing site with uses that are in close proximity to transit stations and lines. The Project would also incorporate elements that promote individual and community safety such as security cameras; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel and reduce areas of concealment; and

designing entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

- **The Project Would Support City Housing Goals.** The Project would increase the range of housing choices available to Downtown employees and residents by replacing a parking structure and surface parking lot with 580 multi-family residential units and neighborhood serving commercial, retail, and restaurant uses. These uses would contribute to the employment base of the Central City Community Plan area, add to the housing stock available to local residents, and continue building on the strengths of the existing labor force and businesses in Downtown Los Angeles.

With regard to the General Plan Housing Element, the Project would support the City's objective to provide an equitable distribution of housing opportunities by type and cost by providing a mixed-use development that would include a variety of new multi-family residential units. The Project would therefore also support the City's objective to plan the capacity for and encourage production of housing units of various types to meet the projected housing needs of the future population by introducing a range of new multi-family residential units to a site that currently provides parking uses. The Project would also support the City's objective to encourage the location of new multi-family housing in proximity to transit by locating a mix of multi-family housing types in an area well-served by public transit.

- **The Project Would Represent Smart Growth.** The Project would represent mixed-use development and the intensification of urban density on an urban infill site in the highly urbanized Downtown Los Angeles area within a City-designated TPA and SCAG-designated HQTAs in close proximity to transit. Furthermore, the Project would not require the extension of roads or utility infrastructure, and the Project would not result in urban sprawl. The Project would also provide housing in close proximity to existing jobs, thereby contributing to a jobs-housing balance. These characteristics are consistent with good planning practice, and would reduce VMT, fuel consumption, and associated GHG emissions.
- **The Project Would Enhance the Project Vicinity.** The Project would enhance pedestrian activity in the area by providing improved sidewalks and human-scale commercial/retail/restaurant frontages on the ground floor, and by planting new street trees. The Project would support the City's policy to provide for the siting and design of new development that enhances the character of commercial districts by introducing a mixed-use development within the Project Site that would feature a similar mix of land uses to the existing uses surrounding the Project Site. The Project's close proximity to the 7th Street/Metro Center rail transit station and numerous bus lines would also encourage use of public transit, and the provision of bicycle parking areas would promote bicycle use. Ground level uses would also include extensive windows and continuous balconies, to be situated 25 feet above grade to activate the street and sidewalk and introduce a human-scale element and visual interest to pedestrians. As such, the Project would improve Downtown's pedestrian environment and circulation and reduce parking demand and VMT by encouraging use of alternative modes of transportation available in the immediate vicinity of the Project Site.
- **The Project Would Represent Sustainable Development.** The Project would be designed and constructed to incorporate features to support and promote environmental sustainability, including incorporating "green" principles in compliance

with the City's Green Building Code, which also incorporates various provisions of the California Green Building Standards Code (CALGreen), and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program in order to meet LEED certified or equivalent building standards, through Project Design Feature GHG-PDF-1. These Project elements include energy conservation, water conservation, waste reduction features, and a pedestrian-friendly site design with large double door glass entrances. The Project would also implement water conservation features that exceed code requirements through Project Design Feature WAT-PDF-1.

The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible, and incorporate sustainability features, including, but not be limited to, high-efficiency/low-flow plumbing fixtures and drip/subsurface irrigation systems to promote a reduction of indoor and outdoor water use, and Energy Star-labeled products and appliances, energy-efficient lighting technologies and fenestration designed for solar orientation. Additionally, continuous balconies along portions of the building would provide passive shading for indoor spaces, reducing energy consumption and allowing for increased natural daylighting and natural ventilation via fully operable balcony doors and windows.

In addition, the Project would meet the City's Green Building Code requirements for parking facilities capable of supporting current and future electric vehicle supply equipment, by including 30 percent of the parking spaces capable of supporting future electric vehicle supply equipment and 10 percent of parking spaces equipped with electric vehicle charging stations.

Based on all of the above, the Project reflects a development that is consistent with the overall vision of the Central City Community Plan as well as with other primary land use plans such as SCAG's 2020–2045 RTP/SCS, and the City's General Plan Housing and Framework Elements. As such, the benefits of the Project, including housing, employment, and opportunities for people to live, work, and recreate within one site and in close proximity to public transit, job centers, and amenities throughout Downtown Los Angeles, would outweigh the effects of the significant and unavoidable impacts of the Project, all of which are temporary construction impacts.

XI. General Findings

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.
2. The EIR evaluated the following potential project and cumulative environmental impacts: air quality, cultural resources, energy resources, geology and soils (paleontological resources), greenhouse gas emissions, land use and planning, noise, population and housing, public services (fire protection, police protection, and schools), transportation, tribal cultural resources, utilities (water supply/infrastructure, wastewater, and energy infrastructure, alternatives, and

other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.
4. Textual refinements and errata (specifically, one Final EIR correction and the addition of two bullet points to Project Design Feature TR-PDF-2 as set forth in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR) were compiled and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with Project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated to describe refinements suggested as part of the public participation process.
5. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.
6. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:
 - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different

mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

- The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.
 - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.
7. The mitigation measures identified for the project were included in the Draft EIR and Final EIR. As revised, the final mitigation measures for the project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.
 8. CEQA requires the Lead Agency approving a project to adopt an MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of PRC Section 21081.6, the City hereby adopts the MMP.
 9. In accordance with the requirements of PRC Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.
 10. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.
 11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.
 12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising

the project.

13. The EIR is a project EIR for purposes of environmental analysis of the project. A project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract Map No. 74876-CN, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

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

Section 66411 of the Subdivision Map Act (Map Act) establishes that local agencies regulate and control the design of subdivisions. Chapter 2, Article I, of the Map Act establishes the general provisions for tentative, final, and parcel maps. The subdivision, and merger, of land is regulated pursuant to Article 7 of the Los Angeles Municipal Code (LAMC). The LAMC implements the goals, objectives, and policies of the General Plan, through zoning regulations, including Specific Plans. Specifically, LAMC Section 17.06 B requires that the tract map be prepared by or under the direction of a licensed surveyor or registered civil engineer. The Vesting Tentative Tract Map was prepared by a Registered Professional Engineer and contains the required components, dimensions, areas, notes, legal description, ownership, applicant, and site address information as required by the LAMC. The Vesting Tentative Tract Map has been filed for the merger, and re-subdivision of three lots into one (1) ground lot and nine (9) airspace lots for residential and commercial condominiums, with below and above grade parking, and a haul route for the export of up to 89,750 cubic yards of soil.

In addition to LAMC Section 17.06 B, Section 17.05 C requires that the vesting tentative tract map be designed in compliance with the zoning regulations applicable to the subject property.

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

The Framework's Long-Range Diagram identifies the Project Site as located within the Downtown Center, an international center for finance and trade, the largest government center in the region, and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation, and Convention Center facilities. The Downtown Center is generally characterized by floor area ratios of up to 13:1 and high-rise buildings.

The 0.83-acre project site is located within the Central City Community Plan Area (Community Plan) and is subject to the Downtown Design Guide. The Community Plan land use designation for the Project Site is Regional Commercial. According to the Community Plan, corresponding zones for the Regional Commercial designation include CR, C1.5, C2, C4, R3, R4, R5, RAS3, and RAS4.

The Project site is zoned C2-4D which permits a variety of uses, such as multiple dwelling residential; a wide range of commercial uses, such as health clubs, restaurants and retail commercial stores; and office uses, hotels, museums, and hospitals.

Height District 4 within the C2 zone does not impose any height limit and the LAMC allows for an approximately 13:1 FAR for the Project Site. However, the "D" limitation restricts the FAR to 6:1 unless a Transfer of Development Rights (TFAR) is approved (Ordinance No. 164,307). As such the Project includes a TFAR entitlement request which would allow the Project's proposed FAR of up to 9.25:1. Therefore, the Project's maximum 9.25:1 FAR would result in 554,927 square feet of floor area which would be consistent with the permitted floor area of the Central City Community Plan. The C2 zone establishes the residential density at one dwelling unit per 400 square feet of lot area. However, the Project site is situated within the Greater Downtown Housing Incentive Area (ZI 2385) which has no limit on the maximum number of dwelling units. The Greater Downtown Housing Incentive Area also allows for zero setbacks along the front, side and rear property lines. The pedestrian walkways are regulated by the Downtown Design Guide and the Project's pedestrian walkways widths along 8th Street, Hope Street and Grand Avenue meet the minimum sidewalk width requirements specified within the Downtown Design Guide. Based on the above development regulations, the proposed merger and re-subdivision of the Project Site into one ground lot and nine airspace lots for residential and commercial condominium purposes, would be consistent with these regulations. The project is consistent with the General Plan and demonstrates compliance with Sections 17.06 of the Los Angeles Municipal Code as well as with the intent and purpose of the General Plan, with regard to lot size, height, density and use.

The Downtown Street Standard calls for 8th Street between Grand Avenue and Hope Street, adjoining the subdivision, to provide a 33-foot half roadway width, a 12-foot-wide sidewalk, and a 5-foot-wide sidewalk easement. However, the existing curb lane is wide enough to provide an independent westbound right-turn lane, three through lanes, and a left turn lane. Street widening is not necessary to alleviate any Project related impact to the circulation of vehicles on the roadway and is not necessary to meet the Mobility Plan's Pedestrian Enhances Network.

Therefore, as conditioned, the proposed Vesting Tract Map demonstrates compliance with LAMC Sections 17.05 C and 17.06 B and is consistent with the applicable General Plan and Specific Plans.

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

For purposes of a subdivision, design and improvement is defined by Section 66418 of the Subdivision Map Act and LAMC Section 17.02. Section 66418 of the Subdivision Map Act defines the term "design" as follows: "Design" means: (1) street alignments, grades and widths; (2) drainage and sanitary facilities and utilities, including alignments and grades thereof; (3) location and size of all required easements and rights-of-way; (4) fire

roads and firebreaks; (5) lot size and configuration; (6) traffic access; (7) grading; (8) land to be dedicated for park or recreational purposes; and (9) such other specific physical requirements in the plan and configuration of the entire subdivision as may be necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan. Further, Section 66427 of the Subdivision Map Act expressly states that the "Design and location of buildings are not part of the map review process for condominium, community apartment or stock cooperative projects."

Section 17.05 C of the Los Angeles Municipal Code enumerates design standards for Subdivisions and requires that each Tentative Map be designed in conformance with the Street Design Standards and in conformance to the General Plan. Section 17.05 C, third paragraph, further establishes that density calculations include the areas for residential use and areas designated for public uses, except for land set aside for street purposes ("net area"). LAMC Section 17.06 B and 17.15 lists the map requirements for a tentative tract map and vesting tentative tract map. The map provides the required components of a tentative tract map.

The vesting tentative tract map design includes the merger, and re-subdivision of three existing lots into one ground lot and nine airspace lots for condominium purposes for a mixed-use development on an approximately 0.83-acre (34,679 square foot) site.

The design and layout of the map is consistent with the design standards established by the Subdivision Map Act and Division of Land Regulations of the Los Angeles Municipal Code. Several public agencies (including the Bureau of Engineering, Department of Building and Safety, Grading Division and Zoning Division, and Bureau of Street Lighting) have reviewed the map and found the subdivision design satisfactory, and have imposed improvement requirements and/or conditions of approval.

Pursuant to the letter dated April 13, 2023, the Bureau of Engineering requires a 3 foot dedication along Hope Street, and sidewalk easements along Hope Street, 8th Street and Grand Avenue, a radius easement line return or corner easement at the intersection with Hope Street and 8th Street, a radius property line return or corner dedication at the corner intersection of 8th Street and Grand Avenue. Sewers are available and have been deemed adequate in accommodating the proposed project's sewerage needs, subject to conditions of approval. The subdivision will be required to comply with all regulations pertaining to grading, building permits, and street improvement permit requirements. Conditions of Approval for the design and improvement of the subdivision are required to be performed prior to the recordation of the tentative map, building permit, grading permit, or certificate of occupancy.

The 0.83-acre project site is located within the Central City Community Plan Area (Community Plan) and is subject to the Downtown Design Guide. The Community Plan land use designation for the Project Site is Regional Commercial. According to the Community Plan, corresponding zones for the Regional Commercial designation include CR, C1.5, C2, C4, R3, R4, R5, RAS3, and RAS4.

The Project site is zoned C2-4D and the vesting tentative tract map design includes the merger and re-subdivision of an approximately 0.83-acre site into one ground lot and nine airspace lots for condominium purposes for a mixed-use development. The Project would include uses consistent with the Community Plan's Regional Commercial Land Use Designation, and the corresponding C2 Zone, which permits commercial, mixed-use and

residential development. The subdivision design and improvements are consistent with the General Plan and demonstrate compliance with the General Plan with regard to lot size and configuration, as well as other specific physical requirements in the plan relating to floor area, height, density and use.

The Downtown Street Standard calls for 8th Street between Grand Avenue and Hope Street, adjoining the subdivision, to provide a 33-foot half roadway width, a 12-foot-wide sidewalk, and a 5-foot-wide sidewalk easement. However, the existing curb lane is wide enough to provide an independent westbound right-turn lane, three through lanes, and a left turn lane. Street widening is not necessary to alleviate any Project related impact to the circulation of vehicles on the roadway and is not necessary to meet the Mobility Plan's Pedestrian Enhances Network.

Upon approval of the entitlement requests, and as conditioned therein, the design and improvement of the proposed subdivision would be consistent with the intent and purpose of the General Plan.

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

The Project Site is currently improved with an existing four-story parking structure and surface parking lot. The Project Site does not contain unique natural geologic features, such as ridges, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. The surface condition of the Project Site is a level asphalt parking lot with no on-site landscaping.

The topography of the Project Site is a relatively flat lot. The Project Site is bounded by Hope Street to the west; 8th Street to the south; and Grand Avenue to the east. The Project Site is located within the Central City Community Plan. The Project Site is located within an urbanized area, and is not located in a Methane Zone, liquefaction, Alquist-Priolo Fault Zone, Landslide, Preliminary Fault Rapture Study Area, Flood Zone, or a Very High Fire Hazard Severity Zone.

The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. Pursuant to the Department of Building and Safety, Grading Division email response dated June 28, 2021, the Project Site does not require a geology/soils report prior to the planning approval of the Tract Map.

In addition, the environmental analysis conducted for the Project found that the tract map and development of the Project would not result in any significant impacts in terms of geological or seismic impacts, hazards and hazardous materials, and safety. In general, compliance with existing regulations, tract map conditions, and mitigation measures identified in the EIR ensure that proposed development could be feasibly and safely constructed and operated on the site. Therefore, the Project Site is physically suitable for the proposed type of development.

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

The General Plan identifies, through its Community and Specific Plans, geographic locations where planned and anticipated densities are permitted. Zoning standards for density are applied to sites throughout the city and are allocated based on the type of land use, physical suitability, and future population growth expected to occur.

The vesting tentative tract map design includes the merger, and re-subdivision of one existing lot into one ground lot and nine airspace lots for condominium purposes for a mixed-use development on an approximately 0.83-acre (34,679 square foot) site. According to the Community Plan, corresponding zones for the Regional Commercial designation include CR, C1.5, C2, C4, R3, R4, R5, RAS3, and RAS4.

The Project site is zoned C2-4D and also subject to the area use restrictions of the Central City Community Plan, which permits a variety of uses, such as multiple dwelling residential; a wide range of commercial uses, such as health clubs, restaurants and retail commercial stores; and office uses, hotels, museums, and hospitals.

The C2 zone establishes the residential density at one dwelling unit per 400 square feet of lot area. However, the Project Site is situated within the Greater Downtown Housing Incentive Area (ZI 2385) which has no limit on the maximum number of dwelling units. Therefore, the 580 residential units under the proposed Project is consistent with the allowable density for the Project Site. The Greater Downtown Housing Incentive Area also allows for zero setbacks along the front, side and rear property lines. Street frontage standards, and pedestrian walkways and other design regulations are governed by the Downtown Design Guide.

Height District 4 does not impose any height limit and the Central City Community Plan permits an FAR of 13:1; however, the site's "D" limitation restricts the FAR to 6:1 unless a TFAR is approved (Ordinance No. 164,307). As such, the Project includes a TFAR entitlement request which would allow the Project's proposed FAR of up to 9.25:1. The Project's maximum 9.25:1 FAR would result in 554,927 square feet of floor area, which, if approved, would be consistent with the permitted floor area of the Central City Community Plan.

Upon approval of the entitlement requests, and as conditioned therein, the Project's proposed density is consistent with the general provisions and area requirements of the LAMC and Greater Downtown Housing Incentive Area. The Project Site is easily accessible via improved public streets, highways, and transit systems. The environmental review conducted by the Department of City Planning under Case No. ENV-2017-506-EIR (SCH No. 2019050010) establishes that the physical characteristics of the site and the proposed density of development are generally consistent with existing development and urban character of the surrounding community. Therefore, the Project Site is physically suitable for the proposed density of development.

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

The Project proposes an infill development within an area designated for high density residential and commercial uses within the Central City Community Plan area in the City of Los Angeles. The vesting tentative tract map design includes the merger and re-subdivision of one lot into one ground lot and nine airspace lots for residential and

commercial condominium purposes, and a Haul Route for the export of approximately 89,750 cubic yards of soil, for a 0.83-acre site.

The subdivision design and improvements are consistent with the existing urban development of the area. There are no habitat conservation plans or natural community conservation plans which presently govern any portion of the Project Site or vicinity. The EIR prepared for the Project identifies no potential adverse impacts on fish or wildlife resources. The Project Site vicinity is urbanized and generally built out and does not contain riparian or other sensitive natural communities, and does not provide a natural habitat for either fish or wildlife. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site. The Project Site does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, conflict with a Habitat Conservation Plan, nor possess any areas of significant biological resource value.

As discussed in the EIR, the Project Site is located in a previously developed area and is currently developed with an existing four-story parking structure and a surface parking lot with no significant landscaping. Due to the disturbed nature of the Project Site and the surrounding urban areas, and lack of open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed, urban settings. Specifically, the Project Site is devoid of any landscaping; therefore, due to the lack of on-site vegetation, there are no special-status plants found, no areas capable of supporting special-status plants, and no special-status animal species occurring within the Project Site due to a lack of suitable habitat on the Project Site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

The Project Site does not include vegetation that would have potential to support nesting birds and/or bats. With regard to the unlikelihood of nesting birds in the existing seven right-of-way trees, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, 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.

The Project proposes to remove all existing trees and tree removal requests are scrutinized by the Urban Forestry Division of the Department of Public Works to ensure all alternatives to tree preservation have been explored. The public property tree species are not considered protected under the City of Los Angeles Protected Tree Ordinance.

Therefore, the design of the subdivision would not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

- (f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

The proposed subdivision and subsequent improvements are subject to the provisions of the Los Angeles Municipal Code (e.g., the Fire Code, Planning and Zoning Code, Health and Safety Code) and the Building Code. Other health and safety related requirements as

mandated by law would apply where applicable to ensure the public health and welfare (e.g., asbestos abatement, seismic safety, flood hazard management).

The Project is not located over a hazardous materials site or flood hazard area, and is not located on unsuitable soil conditions. The Project would not place any occupants near a hazardous materials site or involve the use or transport of hazardous materials or substances. As noted in the EIR, construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the project site.

Operation of the residential, and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, neither construction nor operation of the project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The EIR fully analyzed the impacts of both construction and operation of the Project on the existing public utility and sewer systems and determined that impacts are less than significant. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the Hyperion Treatment Plant. The subdivision will have only a minor incremental increase on the effluent treated by the Hyperion Treatment Plant, which has adequate capacity to serve the project, and which has been upgraded to meet Statewide ocean discharge standards. No adverse impacts to the public health or safety would occur as a result of the design and improvement of the site. Therefore, the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.

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

There are three recorded instruments identifying easements for the Project Site for the purpose of providing water and public access. One easement is for water rights, claim or title to water (Per Chicago Title Insurance Company Order No. 00046245-994-X49-DB dated November 28, 2016). A second easement for an irrevocable offer to dedicate an easement for public street, highway, pedestrian and view easement. (Recorded July 22, 1970, as Instrument No. 1887). A third easement, which was recorded on March 19, 1970, as Instrument No. 1811, appears to be for a portion of the parking structure lying within the public right of way. The existing parking structure would be demolished, and any future development would not conflict with any existing easements. The Project would comply with the Downtown Design Guide by providing the required sidewalk easements of five feet along 8th Street and average sidewalk easement of seven feet, and three feet along Grand Avenue, and Hope Street respectively. The Site is surrounded by private properties that adjoin improved public streets and sidewalks designed and improved for the specific purpose of providing public access throughout the area. In addition, the Bureau of

Engineering did not indicate in its report dated April 13, 2023, that the proposed improvements would conflict with any easements. The Project Site does not adjoin or provide access to a public resource, natural habitat, public park, or any officially recognized public recreation area. Necessary public access for roads and utilities will be acquired by the City prior to recordation of the proposed map. Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

The Downtown Street Standard calls for 8th Street between Grand Avenue and Hope Street, adjoining the subdivision, to provide a 33-foot half roadway width, a 12-foot-wide sidewalk, and a 5-foot-wide sidewalk easement. However, the existing curb lane is wide enough to provide an independent westbound right-turn lane, three through lanes, and a left turn lane. Street widening is not necessary to alleviate any Project related impact to the circulation of vehicles on the roadway and is not necessary to meet the Mobility Plan's Pedestrian Enhanced Network, and would not conflict with easements acquired by the public at-large or access through or use of property within the proposed subdivision.

Therefore, as conditioned, the proposed Vesting Tract Map demonstrates compliance with LAMC Sections 17.05 C and 17.06 B and is consistent with the applicable General Plan and Specific Plans.

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

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

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

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 74876-CN.



LOS ANGELES CITY PLANNING APPEAL FILING PROCEDURES

Entitlement and CEQA appeals may be filed using either the Online Application System (OAS) or in person Drop Off at DSC (Development Services Center).

Online Application System: The OAS (<https://planning.lacity.org/oas>) allows appeals to be submitted entirely electronically online; fee payment is by credit card or e-check.

Drop off at DSC: Appeals of this determination can be submitted in person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.org/development-services/forms>. Public offices are located at:

Metro DSC

(213) 482-7077
201 N. Figueroa Street
Los Angeles, CA 90012

Van Nuys DSC

(818) 374-5050
6262 Van Nuys Boulevard
Van Nuys, CA 91401

West Los Angeles DSC

(CURRENTLY CLOSED)
(310) 231-2901
1828 Sawtelle Boulevard
West Los Angeles, CA 90025

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable Los Angeles Municipal Code provisions.

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure that DSC staff members have adequate time to review and accept the documents, and to allow appellants time to submit payment.



QR Code to Online Appeal Filing



QR Code to Forms for In-Person Filing