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City of Los Angeles



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Karen Bass, Mayor

March 14, 2024

Council File: 05-0686-S1

Council Districts: 14

Contact Persons: Maya Abood (213) 808-8904
Mariano Napa (213) 999-1265

Honorable Members of the City Council
City of Los Angeles
c/o City Clerk, City Hall
200 N. Spring Street
Los Angeles, CA 90012

COUNCIL TRANSMITTAL: LOS ANGELES HOUSING DEPARTMENT REQUEST FOR AUTHORITY TO AMEND THE RESIDENTIAL GROUND LEASE FOR FIRST STREET NORTH A (FSN-A)

SUMMARY

The General Manager of the Los Angeles Housing Department (LAHD) respectfully requests authority to amend the residential Ground Lease Agreements and related documents (GLA) for First Street North A (City Contract No. C-144876), for the affordable housing development project located on the city-owned property at 232 North Judge John Aiso Street. This amendment will reflect the unit mix revision for the First Street North A project.

RECOMMENDATIONS

I. That the City Council, subject to the approval of the Mayor:

- A. AUTHORIZE the General Manager of LAHD, or designee, to amend the FSN-A Ground Lease Agreement (City Contract No. C-144876) to reflect the Project's revised unit mix; and amend the Key Terms and Conditions and other related documents as necessary to effectuate this revision.

BACKGROUND

On June 27, 2022, LAHD executed a Disposition and Development Agreement (DDA) for the Go for Broke Community Project between the City of Los Angeles and LTSC Community Development Corporation and Go for Broke National Education Center (Jointly "Developer"). The DDA allows the Developer to begin the development process, which includes applying for the necessary entitlement approvals and applying for the necessary financing. On August 23, 2023, the Developer received a reservation of tax-exempt bonds and four percent tax credits for FSN-A and on July 26, 2023 also received nine percent tax credits for FSN-B.

Subsequently, on January 11, 2024, LAHD executed a residential GLA with FSN A Apartments L.P. LTSC Community Development Corporation is the sole member and manager of FSN A Apartments, LLC, the managing general partner of FSN A Apartments, L.P. The terms of the GLA are based on the Disposition and Development (DDA) agreement (City Contract No. C-140683), which was approved by Council on April 24, 2022 (Council File No. 05-0686-S3), as well as the transmittal requesting authority to execute the Ground Lease for FSN A Apartments and FSN, which was approved by Council on December 21, 2023 (Council File No. 23-0025).

Unit Mix.

The DDA described the FSN A project as having 181 total units, of which 179 units are restricted as affordable. It proposed 59 restricted studio units, 28 restricted 1-bedroom units, 45 restricted two-bedroom units, 47 restricted three-bedroom units, and two (2) three-bedroom manager units. However, for the project to be more financially viable, the Developer requested changing the two manager units from three-bedroom units to two-bedroom units, thus increasing the restricted three-bedroom units by two (2) while decreasing restricted two-bedroom units by (2). See Table 1 below.

While the executed Ground Lease and related disposition documents reflect the DDA’s unit mix, the executed financing documents show the revised unit mix of 59 restricted studio units, 28 restricted 1-bedroom units, 43 restricted two-bedroom restricted units, 49 restricted three-bedroom restricted units, and two (2) two-bedroom managers’ units. The total number of units (181) and restricted units (179) remains unchanged.

| TABLE 1- COMPARISON OF ORIGINAL AND REVISED UNIT MIX | | | | | | |
|--|--------------------|------------------------|------------------------|--------------------------|------------------------------|-------------|
| | Restricted Studios | Restricted One-Bedroom | Restricted Two-Bedroom | Restricted Three-Bedroom | Managers Units | Total Units |
| DDA | 59 | 28 | 45 | 47 | 2 (three-bedroom units) | 181 |
| Current GLA | 59 | 28 | 45 | 47 | 2 (three-bedroom units) | 181 |
| Proposed GLA | 59 | 28 | 43 | 49 | 2 (two-bedroom units) | 181 |

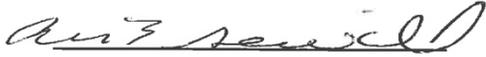
Therefore, LAHD requests approval to amend the GLA, including the Regulatory Agreement, and any other relevant land disposition documents to reflect the change in the unit mix and size of managers’ units described above. The Fair Reuse Analysis and Report for FSN-A has been updated and in accordance with the Los Angeles Code Sections 7.27.2 and 22.008, the reuse analysis confirms the findings that the purchase price and the terms and conditions imposed in the DDA do not materially affect the original determination that the terms serve a public purpose.

The amendment of the ground lease does not require a California Environmental Quality Act (CEQA) analysis. The Department of City Planning determined that based on the whole of the administrative record as supported by the justification prepared and found in the environmental case file, the project is exempt (ENV-2021-3773-CE) from California Environmental Quality Act (CEQA) Guidelines pursuant to Section 15332, Class 32 (In-Fill Development Project) (ENV-2021-3773-CE).

Fiscal Impact

There is no impact on the General Fund.

Approved By:

A handwritten signature in cursive script, appearing to read "Ann Sewill".

ANN SEWILL
General Manager
Los Angeles Housing Department

ATTACHMENT:

CEQA Determination

COUNTY CLERK'S USE

CITY OF LOS ANGELES
 OFFICE OF THE CITY CLERK
 200 NORTH SPRING STREET, ROOM 395
 LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
 (PRC Section 21152; CEQA Guidelines Section 15062)

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152(b) and CEQA Guidelines Section 15062. Pursuant to Public Resources Code Section 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS

DIR-2021-3772-TOC-CDO-HCA-PHP / Transit Oriented Communities Affordable Housing Incentive Program and Community Design Overlay

LEAD CITY AGENCY

City of Los Angeles (Department of City Planning)

CASE NUMBER

ENV-2021-3773-CE

PROJECT TITLE

Go For Broke Apartments

COUNCIL DISTRICT

14 – de León

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

122-128, 130-230 N Judge John Aiso St, 200 N Central Ave, 308-312 & 307-331 E Jackson St (Cross Streets: Judge John Aiso St & Temple St)

Map attached.

PROJECT DESCRIPTION:

Demolition of an existing surface parking lot and 2 non-protected trees, and construction of a 6-story, 86-ft 1-inch, mixed use building with 43,023 square feet of commercial and 248 dwelling units, reserving 245 for Low Income Households, with 94 total nonresidential vehicular parking spaces at grade and in one subterranean parking garage, 165 total bicycle parking spaces, 34,444 square feet of open space and sixty-five (65) 24-inch box trees. The project will export approximately 45,900 cubic yards of earth.

Additional page(s) attached.

NAME OF APPLICANT / OWNER:

Debbie Chen, Little Tokyo Service Center (A) / City of Los Angeles, Dept. of General Services (O)

CONTACT PERSON (If different from Applicant/Owner above)

Alfred Fraijo Jr., Sheppard Mullin, Richter and Hampton LLP

(AREA CODE) TELEPHONE NUMBER

(213) 620-1780

EXT.

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

STATE CEQA STATUTE & GUIDELINES

STATUTORY EXEMPTION(S)

Public Resources Code Section(s) _____

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

CEQA Guideline Section(s) / Class(es) **Section 15332 – Class 32 (Urban In-Fill Development)**

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

JUSTIFICATION FOR PROJECT EXEMPTION:

Additional page(s) attached

Class 32 – (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered, rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services

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

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

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

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

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE

Jim Harris

STAFF TITLE

City Planning Associate

ENTITLEMENTS APPROVED

Transit Oriented Communities Affordable Housing Incentive Program and Community Design Overlay – See Case # DIR-2021-3772-TOC-COD-HCA-PHP

FEE:

\$5,774,00 + surcharges

RECEIPT NO.

060521AD2-FD46E9C7-AD8C-407F-AF74-499A87698A86

REC'D. BY (DCP DSC STAFF NAME)

Eric Claros

DISTRIBUTION: County Clerk, Agency Record

Rev. 3-27-2019

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

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DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

VACANT
DEPUTY DIRECTOR

JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. ENV-2021-3773-CE

The Director of Planning has determined that based on the whole of the administrative record, that the project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, Class 32 In-Fill Development Projects, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

The proposed project is for demolition of the surface parking lot and two (2) nonprotected Pyrus kawakamii street trees along Judge John Aiso Street, and for the construction, use, and maintenance of a six-story mixed-use building. The project includes 43,023 square feet of ground floor neighborhood service uses and 248 dwelling units, of which 245 dwelling units are reserved for Low Income Households with 50 percent of the affordable unit set aside as permanent supportive housing. The ground floor uses include commercial, restaurant, and philanthropic uses. The building will have total of 330,521 square feet of floor area, a Floor Area Ratio (FAR) of 2.91:1 and have maximum height of 86 feet 1 inch as measured from Grade to the highest point on the roof structures. The project includes 94 total non-residential vehicular parking spaces and 165 bicycle parking spaces that consists of 137 long term and 14 short term residential bicycle spaces and seven (7) long term and seven (7) short term commercial bicycle spaces. The project includes 34,444 square feet of open space consisting of a plaza, pocket park, paseo, artist alley, project entry, three (3) outdoor courtyards on the second floor, community room, lounge, and multipurpose space. The project will provide a minimum of 65 trees for the project on-site and in the public right-of-way. The development of the project requires the removal of approximately 45,900 cubic yards of soil.

The applicant is seeking approval of the following Base and Additional Incentives of the Transit Oriented Communities (TOC) Affordable Housing Incentive Program:

- Base Incentives:
 - No required parking for residential units for an eligible Tier 4 Transit Oriented Communities housing development.
- Additional Incentives
 - Allow a joint public and private development that qualifies as an eligible housing development to utilize the uses and area standards permitted in the least restrictive adjoining zone, the [Q]C4-2D-CDO Zone in lieu of the PF-2D-CDO.

Additionally, the applicant is seeking approval of a Community Design Overlay Plan Approval for the construction of a new mixed-use project with a maximum of 330,521 square feet of floor area, including 29,800 square feet of commercial, 10,763 square feet of philanthropic institutional, and

2,460 square feet of restaurant space, and 248 dwelling units, reserving 245 units for Low Income Households within the Little Tokyo Community Design Overlay.

The subject site is a level, irregularly shaped, 113,872 square foot site (2.61 acres), post dedications and mergers per the Vesting Tentative Tract Map application under Case No. VTT-83441-CN. The existing site consists of 35 lots per the engineering survey, and is zoned PF-2D-CDO and [Q]C4-2D-CDO with the General Plan Land Use Designations of Public Facilities and Other Public Open Space. The site is located within the Central City Community Plan area and the Little Tokyo Community Design Overlay. The site fronts Temple Street on the north, Judge John Aiso Street on the west, and Jackson Street on the south.

With the approval of the requested Public Facilities Additional Incentive per the Transit Oriented Communities Affordable Housing Incentive Program (TOC), the entire project site is subject to requirements of the [Q]C4-2D-CDO Zone in lieu of the PF-2D-CDO Zone. The project site is subject to Development "D" Limitations pursuant to Ordinance 164,307 Subarea 380. The "D" limits the site to a 3:1 Floor Area Ratio (FAR). Additionally, the [Q] Condition limits the use and development of ground floor commercial retail uses to those Neighborhood Retail and Neighborhood Service uses listed in LAMC Section 13.07 C. The site is located within the Greater Downtown Housing Incentive Area (GDHIA). Projects with the GDHIA are allowed unrestricted density. Furthermore, the site is located within a Transit Oriented Communities Affordable Housing Incentive Program (TOC) Tier 4 area. The project site is also located within the following: State Enterprise Zone (ZI-2374), Downtown Design Guide Project Area (ZA-2416), Transit Priority Area in the City of Los Angeles (ZI-2452), Methane Buffer Zone and Fire District 1.

The project site is currently improved with an existing surface parking lot. The site was previously improved with the Tinker Toy Parking Structure, also referred to as City of Los Angeles Parking Lot No. 3. The structure is listed in SurveyLA and HistoricPlacesLA as an eligible State and Local historic resource. The structure was demolished in 2020 under Los Angeles Department of Building and Safety Permit Number 20019-10000-00142. The Los Angeles Office of Historic Resources determined the property is not eligible as a potential historical resource in an email correspondence dated June 21, 2021. There are also 12 nonprotected street trees with 24-inch or greater diameter trunks along Temple Street and five (5) nonprotected street trees with less than 24-inch diameter trunks along Judge John Aiso Street. There are no protected shrubs on the site. The 12 trees along Temple Street and three (3) of the trees along Judge John Aiso Street will be retained as part of the proposed project. The removal of the two (2) street trees along Judge John Aiso Street will be subject to the 2:1 replacement ratio to the satisfaction of the Urban Forestry Division during the permitting process.

The surrounding properties are developed with public facilities and cultural institutions. The property to the north is zoned PF-2D and improved with the four-story Downtown Los Angeles Veteran's Affairs Clinic and the 20-story Edward R. Roybal Federal Building. The property to the east, across Alameda Street, is zoned PF-1XL-RIO and is improved with a Los Angeles Department of Water and Power facility. To the south, the properties are zoned [Q]C4-2D-CDO and are improved with the Geffen Museum and the Japanese American National Museum. Additionally, the historic Japanese Union Church of Los Angeles and the San Pedro Film Building are also abutting the site to the south, as well as The Go For Broke Monument, a tribute to the Japanese American soldiers of World War II. The property to the west, across Judge John Aiso Street, is zoned PF-2F-CDO and is improved with a Los Angeles Police Department facility.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following criteria:

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

The site is zoned PF-2D-CDO and [Q]C4-2D-CDO with the General Plan Land Use Designations of Public Facilities and Other Public Open Space. The site is located within the Central City Community Plan area and the Little Tokyo Community Design Overlay. With the approval of the requested Public Facilities Additional Incentive per the Transit Oriented Communities Affordable Housing Incentive Program (TOC), the entire project site is subject to requirements of the [Q]C4-2D-CDO Zone in lieu of the PF-2D-CDO Zone. The project site is subject to Development "D" Limitations pursuant to Ordinance 164,307 Subarea 380. The "D" limits the site to a 3:1 Floor Area Ratio (FAR). Additionally, the [Q] Condition limits the use and development of ground floor commercial retail uses to those Neighborhood Retail and Neighborhood Service uses listed in LAMC Section 13.07 C. The site is located within the Greater Downtown Housing Incentive Area (GDHIA). Projects with the GDHIA are allowed unrestricted density. As shown in the case file, Case Number DIR-2021-3772-TOC-CDO-HCA-PHP, the project is consistent with the existing zoning, general plan and all other applicable land use regulations.

- b) *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The subject site is wholly within the City of Los Angeles, on a site that is approximately 2.61 acres. Lots adjacent to the subject site are developed with the following urban uses: a four-story clinic, a 20-story Federal office building, a Los Angeles Department of Water and Power facility, museums, a Los Angeles Police Department facility, a church, a monument to World War II Japanese American soldiers, and commercial building.

- c) *The project site has no value as habitat for endangered, rare or threatened species.*

The site is previously disturbed and surrounded by development and therefore is not, and has no value as, a habitat for endangered, rare or threatened species. Furthermore, there are no protected tree or shrub species on the site or in the adjacent right-of-way as identified in the Tree Report prepared by Amy Ross, ASLA, PLA, on April 10, 2021. Two (2) nonprotected *Pyrus kawakamii* street trees along Judge John Aiso Street are proposed to be removed from the subject property. These two (2) street trees will be required to be replaced at a 2:1 ratio to the satisfaction of the Urban Forestry division. The project is conditioned to provide a minimum of sixty-two (62) 24-inch boxes as part of the project.

- d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

The project is subject to Regulatory Compliance Measures (RCMs) in the City of Los Angeles that regulate impacts related to air quality, traffic, and construction and operational noise.

Rincon Consultants, Inc. conducted an Air Quality Study for the project, dated June 2021. The study found the project would not result in significant air quality impacts with implementation of RCMs. Furthermore, the operation and construction emissions associated with the proposed project would not generate significant impacts.

Linscott Law & Greenspan Engineers (LLG) completed a Transportation Assessment Report in June 2021. The assessment was approved by the Los Angeles Department of Transportation dated June 2, 2021, showing the project will not create traffic impacts.

Rincon Consultants, Inc. conducted a Noise and Vibration Study in June 2021. The study showed the project will not result in significant noise impacts

The proposed development is not unusual for the vicinity of the subject site and will be compatible with existing uses in the area. Neither the existing surface parking lot use, nor the proposed use demonstrates any unusual circumstances, and the project will not generate significant traffic, air quality, or noise impacts.

- e) *The site can be adequately served by all required utilities and public services.*

The construction of the mixed-use development will be located on a site which has been previously developed and is consistent with the General Plan. The project is in a highly urbanized area served by public facilities including fire protection, police protection, schools, and parks, as well as by other utilities. Therefore, the project meets all of the Criteria for the Class 32.

There are five (5) exceptions which the City is required to consider before finding a project exempt under Class 32: (a) Cumulative Impacts; (b) Significant Effect; (c) Scenic Highways; (d) Hazardous Waste Sites; and (e) Historical Resources.

- a) There is one (1) known approved projects of a similar multifamily residential development type within 1,000 feet of the subject site:

- VTT-82168-CN: Approval of a Vesting Tentative Tract Map for an eight-story mixed-use development with 77 residential condominiums and ground floor commercial use located at 118-124 South Astronaut Ellison S Onizuka Street, on December 19, 2018. This project is related to DIR-2014-4148-SPR-CDO.
- DIR-2014-4148-SPR-CDO: Approval of a mixed-use development with 77 residential dwelling units and 2,294 square feet of ground floor commercial uses located at 118-124 South Astronaut Ellison S Onizuka Street, on December 12, 2016. The project is currently under construction and is anticipated to be completed in the first quarter of 2022.

The proposed project as well as the one (1) approved projects may create environmental impacts on the surrounding area. The environmental assessment for the project located at 124 S. Astronaut Ellison S Onizuka St., case number DIR-2014-4148-SPR-CDO, was cleared under a Mitigated Negative Declaration, case number ENV-2014-4149-MND. The subject project and the above listed project are subject to Regulatory Compliance Measures (RCMs) in the City of Los Angeles that regulate impacts related to air quality, traffic, and construction and operational noise as previously mentioned and are therefore, not expected to contribute to cumulative impacts.

- b) As mentioned, the proposed development is not unusual for the vicinity of the subject site and will be compatible with existing uses in the area. The project proposes a six-story mixed-use building that includes 43,023 square feet of ground floor neighborhood service uses and 248 dwelling units, of which 245 dwelling units are reserved for Low Income Households in an area zoned and designated for such development. All adjacent lots are developed with commercial and government uses, and the subject site is of a similar size and slope to nearby properties. The project proposes a Floor Area Ratio (FAR) of 2.91:1 on a site that is permitted to have a maximum FAR of 3:1. The six-story structure is not unusual for the vicinity of the subject site and is similar in scope to other existing mixed-use buildings in the area. The site is located within a Methane Buffer Zone and Fire District 1, as such the project must comply with Department of Building and Safety's and Fire Department's measures for projects located within Methane Zones and Fire District 1. Therefore, there are no unusual circumstances that may result in any significant environmental effects, and the significant effect exception does not apply to the project.

- c) The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. The project site is located approximately 19 miles east of the highway. Therefore the subject site will not create any impacts within a designated as a state scenic highway.
- d) According to Envirostor, the State of California's database of Hazardous Waste Sites, the subject site is not identified as a hazardous waste site. The nearest site in proximity to the proposed project is the former site of the Northern Transportation located at 100 N. Central Street in what is currently the Japanese American National Museum. The site is listed as needing evaluation only, case number 80001119, as of July 1, 2005. Two (2) Phase I Environmental Site Assessments and a Phase II Environmental Site Assessment were conducted on the site by EFI Global for the project. The assessments revealed no evidence of recognized environmental conditions or de minimis conditions in connection with the property and that no further assessment is warranted. Therefore, the project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the hazardous waste sites exemption does not apply to the project.
- e) The project site has not been identified as a resource nor has it been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register. A Historic Resources Assessment (HRA) was conducted by Rincon Consultants, Inc. due to the project site's proximity to several designated or previously identified historical resources. There are 11 qualifying historical resources in the immediate urban block surrounding the project site, including the National Historic Landmark-designated Little Tokyo Historic District and its nine (9) contributing buildings, and one (1) additional Los Angeles Historic Cultural Monument (the Ayoma Tree, HCM #920). The assessment determined the proposed project would not result in a substantial adverse change in the significance of any historic resource, and therefore would not have a significant effect on the environment as defined by CEQA. The Los Angeles Office of Historic Resources reviewed the HRA and agreed with its findings on June 21, 2021. Furthermore, Rincon Consultants, Inc., conducted a Noise and Vibration Study for the demolition, excavation and construction of the project. The analysis found that the project would not result in significant adverse direct or indirect impacts to the historic resources. Based on this, the project will not result in a substantial adverse change to the significance of a historic resource and historic resources exception does not apply.