ERRATA TO THE
FINAL ENVIRONMENTAL IMPACT REPORT FOR THE
1020 S. FIGUEROA PROJECT

CASE NUMBER: ENV-2015-1159-EIR
STATE CLEARINGHOUSE NUMBER: 2016021013

PREPARED FOR:

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ERRATA – 1020 S. FIGUEROA PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

A. INTRODUCTION

This Errata has been prepared to make minor corrections to the Final Environmental Impact Report, Case Number: ENV-2015-1159-EIR, State Clearinghouse Number: 2016021013 (Final EIR) for the 1020 S. Figueroa Project. The information provided herein does not represent significant new information that would affect the analysis or conclusions presented in the Final EIR for the Project. Section 15088.5 of the CEQA Guidelines specifically states: "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

CEQA Guidelines Section 15088.5 also provides that "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record."

The minor modifications to the Final EIR include corrections to account for an error in the floor area stated for Alternative 4, the Modified Design Alternative. Specifically, the residential floor area has been corrected from 472,616 square feet to 545,747 square feet. This represents an increase of 73,131 square feet, to account for hallways and common areas not previously included in the calculations. While the calculation of the floor area changed, the number of residential units associated with Alternative 4 and their general characteristics have not changed. Activities associated with the residential units would not materially change and the basic impact findings associated with the Alternative would remain essentially the same. A similar correction to account for hallways and common areas was also made to commercial floor area for Alternative 4, which reflects a change from 55,499 square feet to 58,959 square feet, an increase of 3,460 feet of commercial floor area. Similar to the change in residential floor area, the increase in commercial floor area is not substantial enough to change the basic impact findings for the Alternative.

Two types of edits have been made to the Final EIR to account for the recalculation of floor area for Alternative 4. The first set of set of edits merely corrects the values where they are reported in the text to reflect the recalculated values.

The second set of edits to the Final EIR provides revisions to the analyses of environmental topics for Alternative 4where the amount of residential and/or commercial floor area is used in calculations. For each of these analyses, the data used and the conclusions are reported and incorporated into the related discussions, and as indicated above, the revisions do not change the basic findings previously presented in the Final EIR.

The revisions to the Final EIR pertain to an analysis that compared the impacts of Alternative 4, Modified Design Alternative, to those of the Project as presented in the Draft EIR. The amount of floor area for Alternative 4 evaluated in the Final EIR, 860,121 square feet, reflected a reduction of approximately 24 percent from that of the Project's 1,129,284. The analysis in the Final EIR indicated that the impacts of Alternative 4 that are based on the area of residential and/or commercial development were reduced from those of the Project somewhat proportionately.

The analysis of Alternative 4 Modified Design Alternative based on the updated calculation of floor area reflects 936,712 square feet, or a reduction of approximately 17 percent compared to the Project. The revised values for the impacts associated with Alternative 4 presented in this Errata, while slightly greater than those reported for the Alternative in the Final EIR, remain substantially less than those of the Project.

The corrections provided to the Final EIR in this Errata does not represent significant new information that would deprive the public of a meaningful opportunity to comment upon a substantial adverse effect environmental effect of the Project or a feasible way to mitigate or avoid such an effect that the Applicant has declined to adopt. The City has reviewed the information in this Addendum and has determined that it does not change any of the basic findings or conclusions of the Final EIR, does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5, and does not require recirculation of the Draft EIR.

B. ERRATA TO THE FINAL EIR

The Final EIR, Chapter 3.0, Corrections and Additions to the Draft EIR, has been revised to correct errors in certain square footage numbers shown for Alternative 4, Modified Design Alternative. Corrections have also been made where these square footage numbers were used in calculating the environmental effects of the alternative for individual environmental topics. The primary changes outlined below are to the discussion of Alternative 4, the Modified Design Alternative, in pages 3-1 to 3-43 of Chapter 3.0, Corrections and Additions, of the Final EIR. In addition, the updated amount of square footage has been added to the Final EIR Topical Response, TR-1: Alternative 4, The Modified Design Alternative, on page 2-8 of Chapter 2.0, Response to Comments.

3.0 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

INTRODUCTION

This section includes two subsections. As discussed in Chapters 1 and 2 of this Final EIR, Alternative 4 (Modified Design Alternative) is being added to this Final EIR in response to public comments raised during the Draft EIR public comment period, including those pertaining to aesthetic, historic and land use impacts. Subsection 1 presents a detailed description of Alternative 4 as well as an environmental analysis regarding the potential impacts that would result from the implementation of Alternative 4. Subsection 2 provides corrections and/or additions to the Draft EIR as a result of comments received on the document, including edits to discussions of alternatives that go beyond the specific evaluation of Alternative 4, such as the discussion of the Environmentally Superior Alternative, and the summary table comparing the impacts of all of the Alternatives to those of the Project.

SUBSECTION 1- NEW ALTERNATIVE 4: MODIFIED DESIGN ALTERNATIVE

The following new Subsection 5.F.4 is added to Chapter 5.0, Alternatives, of the Draft EIR after the analysis of Alternative 3, Residential with Ground Level Commercial, starting on page 5-57. (Table numbers below reflect the continuity of table numbering originally presented in Chapter 5.0.)

5.F.4 ALTERNATIVE 4: MODIFIED DESIGN

(A) DESCRIPTION OF THE ALTERNATIVE

Alternative 4, the Modified Design Alternative includes the same uses as the Project, but in varied amounts; and with a reconfiguration of the Project's building components and open space. The changes to the Project under Alternative 4 have been developed to address public comments regarding the Project's ground level appearance and open space, views, setbacks, historic resource issues associated with the adjacent Petroleum Building, the amount of signage and lighting, and consistency with the City of Los Angeles Downtown Design Guide (Downtown Design Guide). As further detailed below, compared to the Project, the Modified Design Alternative would eliminate one of two residential towers, reduce overall development floor area by ~~nearly 24~~ approximately 17 percent, reduce residential units by approximately 33 percent, reduce commercial uses by approximately ~~31~~ 26 percent, and reduce digital display signage by approximately 63 percent. The heights of the remaining residential tower and the Hotel Tower would remain as proposed under the Project, and there would be no change in the number of hotel rooms.

The Modified Design Alternative includes a reduction in the overall size of the Project, adds two new ground level plaza areas, increases ground level building articulation with varied podium heights and gaps in building facades, increases setbacks at key locations, and provides substantial reductions in the amount of Project signage. Most notably, one of the residential towers, Residential Tower 1, proposed under the Project at 32 stories with 490 feet of height, has been eliminated. However, the Podium structure below that tower, i.e. the first 75 feet of development height at 11th Street and Flower Street, would remain. Hotel uses would extend into the podium area above the podium's ground level retail space. Residential Tower 2 with 540 feet would be the same height as with the Project. However, the Modified Design Alternative would include ~~48~~ 49 floors of residential development in the tower's interior space in contrast to the 38 floors

proposed for the Project. The Podium beneath Residential Tower 2 would be reduced in height from 75 feet to 55 feet. The Hotel Tower would have the same height as that of the Project, 430 feet of height, with 29 stories.

Illustrative materials showing a site plan for the Modified Design Alternative, along with renderings showing its appearance and also schematic signage summary are included in Appendix A of the FEIR, *Illustrations of the Modified Design Alternative*. Figure A-1 provides the site plan and Figure A-2 shows the general massing and location of buildings. Figures A-3 through A-6 provide illustrative elevations from each of the four Project sides. Figure A-7 shows the location of proposed signage. Figures A-8 through A-12 illustrate the appearance of the Modified Design Alternative from various ground elevations in the Project vicinity. Figure A-13 shows the buildings in the context of their skyline setting.

As was the case with the Project, vehicular access would be from W. Olympic Boulevard, S. Flower Street and 11th Street. However, a residential access previously provided on 11th Street. The 11th Street driveway would remain for hotel uses only. A driveway on Olympic Boulevard would be for residential and service uses only. A driveway on S. Flower Street would be hotel, commercial and service uses. Similar to the Project, parking would be provided in the four subterranean parking level according to code, which would include up to ~~738~~ 741 parking spaces in contrast to the Project's 799 spaces. Another variation is the addition of two new plazas, one located along W. Olympic Boulevard and one located along 11th Street to complement the larger Figueroa Street plaza. The Modified Design Alternative would include the same Site Security features (full time security program, and Crime Prevention Through Environmental Design strategies with the same components); and the same sustainability features (equivalency with the LEED Silver Certification level, compliance with State and City green building codes and sustainability program) as under the proposed Project.

The total amount of development would be reduced from the Project's 1,129,284 square feet, to ~~860,121~~ 936,712 square feet, resulting in a development FAR of ~~7.4:1~~ 8.03:1. The differences between the Modified Design Alternative and the Project are shown in **Table 5-7**, *Comparison of Development Programs*. As indicated in the table, the total number of residential units has been reduced from 650 units to 435 units (i.e. a decrease of 215 units). The number of hotel rooms has remained the same at 300 rooms; however ancillary hotel uses have been increased from 32,665 square feet to 36,580 square feet (i.e. an increase of 3,915 square feet). The amount of retail/restaurant space has been reduced from 80,000 square feet to ~~55,499~~ 58,959 square feet (i.e. a decrease of ~~24,501~~ 21,041 square feet).

The Modified Design Alternative, like the Project, would also have two development Phases; however, the overall level of activity within the two Phases would differ slightly. Phase 1 would include construction of the new hotel with its podium, retail uses and terraces. The residential tower (referred to as Residential Tower 1 under the proposed Project) in the southeast portion of the Project Site would not be constructed under the Modified Design Alternative. The number of hotel rooms would remain the same as the Project; however, the amount of space for ancillary hotel uses (banquet, conference, and amenity areas) would be increased. Overall Phase 1 would result in the construction of reduced building floor area under the Modified Design Alternative as compared to the Project. Phase 1 of the Modified Design Alternative would generate the same daily building construction activity levels as the Project, but would require fewer days of building construction as compared to Phase 1 of the Project. Phase 2 (after completion of Phase 1) would include the demolition of the existing hotel with the construction of the residential tower along with retail

Table 5-7
Comparison of Development Programs

Total Uses	Space		
	Project	**Alternative 4**	**Change**
Residential			
Residential Units (Tower 1)	290	0	*-290* units
Residential Units (Tower 2 and Podium units)	360	435	75 units
Total Residential Units	*650*	*435*	*-215 units*
Residential Floor Area (Tower 1)	341,467	0	-341,467 sf
Residential Floor Area (Tower 2)	407,817	~~459,043~~531,079	~~51,226~~ 123,262 sf
Residential Amenities	20,000	~~13,573~~ 14,668	~~-6,427~~ -5,332 sf
Total Residential Floor Area	*769,284*	~~472,616~~545,747	*~~-296,668~~ -223,537sf*
Hotel			
Hotel Rooms	300	300	0 rooms
Banquet Facilities	10,000	15,080	5,080 sf
Conference Facilities	6,000	5,601	-399 sf
Amenities	16,665	15,899	-766 sf
Total Hotel Floor Area	*280,000*	*332,006*	*52,006 sf*
Commercial			
Restaurant	40,000	~~23,384~~ 27,238	~~-16,616~~ -12,762 sf
Retail/Commercial	40,000	~~32,115~~ 31,721	~~-7,885~~ -7,491sf
Total Commercial Floor Area	*80,000*	*~~55,499~~ 58,959*	*~~-24,501~~ -21,041 sf*
Total Building Floor Area	**1,129,284**	**~~860,121~~ 936,712**	**~~-269,163~~ –192,572 sf**
Open Space			
Private Open Space	27,000	23,100	-3,900 sf
Public Open Space	9,250	8,300	-950 sf
Common Open Space	45,500	19,800	-25,700 sf
Total Open Space	*81,750*	*51,200*	*-30,550 sf*

(a.) ___

Source: ESA PCR, 2017

uses and podium terraces. The residential tower would be the same height as the proposed Project; however, the Modified Design Alternative would fit ~~48~~ 49 floors of residential development into the tower's interior space in contrast to the 38 floors proposed for the Project. Overall Phase 2 would result in the construction of greater building floor area under the Modified Design Alternative as compared to the Project. Phase 2 of the Modified Design Alternative would generate the same daily building construction activity levels as the Project, but would require more days of building construction as compared to Phase 2 of the Project.

The Modified Design Alternative would increase the depth of excavation for subterranean parking from 45/50 feet to 65 feet, to accommodate changes in the basement in both Towers from a concrete structure to a steel structure for greater structure flexibility, thus requiring a larger floor to floor height. The increase in

building depth would increase the amount of excavation to be hauled off-site from the Project's 202,000 cubic yards to approximately 254,300 cubic yards. The additional excavation under the Modified Design Alternative would be accommodated by extending the number of days in the excavation phases by up to approximately 23 days in Phase 1 and up to approximately 16 days in Phase 2. The maximum level of construction activity on any one day under the Modified Design Alternative would remain approximately the same as the Project.

(B) ENVIRONMENTAL IMPACTS

(1) Aesthetics/Visual Resources

i. Aesthetics and Views

The Modified Design Alternative would replace the existing Luxe Hotel and parking lots with a new residential, hotel and retail project with two towers and a Podium structure. Construction activities would have the potential to degrade the visual character of the Project Site due to construction equipment, exportation of excavation materials, cranes and views of incomplete buildings. Construction fencing would be provided for safety, and screening of the Project Site.

Once built, the Alternative's two towers would be located atop a five-level Podium constructed in Phase 1 and a three-level Podium constructed in Phase 2. The Residential Tower would be up to 540 feet in height and located at the northwest portion of the Site at the corner of Olympic Boulevard and Figueroa Street. The 29 story Hotel Tower would be up to 430 feet in height; and would be located on the southwest portion of the Project Site directly across from the Staples Center Arena. The maximum heights of both towers would be the same as under the Project.

The Modified Design Alternative would have a contemporary architectural style similar to that of the Project; however, there would be changes in the overall aesthetic appearance. The Modified Design Alternative breaks up and reduces the amount of the ribbon of digital display signage from approximately 60,000 square feet to approximately 21,200 square feet, a reduction of 63 percent, with reductions in signage height as well as area. It also breaks up continuous Podium facades in a manner that creates a layered box appearance, with varied horizontal and vertical shapes. These changes would result in smaller individual building components that are more integrated with the streetscape, with broader views across the Project Site that would provide an improved pedestrian experience, as advised in Section 06, Massing and Street Mall and Section 08, Architectural Detail of the Downtown Design Guide. (Figures B-8, B-9 and B-11.) The ground level appearance would be further enhanced with the provision of a new plaza along 11th Street and another new plaza along W. Olympic Boulevard to complement the redesigned main plaza on Figueroa Street. The amount of overall plaza area would be increased from 5,000 square feet to 7,700 square feet. (See Table 5-11, Alternative 4- Plaza and Residential Open Space Provisions). The plazas would include landscaping, artwork, and other amenities. (Figure B-3 and Figures B-8 through B-12.)

The layered box character is reflected in the tower designs, as both the Residential Tower and the Hotel Tower utilize the stacking box roofline to echo the Podium Design, to create roofline articulation, in contrast to the slanted residential tower roofs of the Project. (Figure B-2). Thus, while the appearance of the buildings would be varied, their character would be generally similar to those of the Project as they would have generally similar massing (albeit with one less Tower) and would fit into a similar Downtown vernacular. As with the Project, the buildings would be compatible with the existing, developed urban setting. (Figures B-8 to B-12.)

View impacts of the Modified Design Alternative would be varied with changes to the massing of the Residential Towers. Elimination of Residential Tower 1 would reduce view impacts from more distant locations and from elevations higher than 75 feet adjacent to the Project Site: notably the adjacent area currently occupied by the El Cholo Restaurant on the north side of the Project Site and the residential component of the Oceanwide project, atop its own podium, on the south side. (Figure B-11.)

The remaining Residential Tower increases the amount of space between the new tower and the Petroleum Building from approximately 20 feet in the Project to approximately 38 feet with the Modified Design Alternative. Under the Modified Design Alternative, the Phase 2 Residential Podium increases the amount of space between the new Podium and the Petroleum Building from 0 feet in the Project to approximately 20 feet, as well as lowering it in height from 75 feet to 55 feet. This results in a more open entry into the Project Site from W. Olympic Boulevard and allows a larger viewing angle of the wall sign on the western face of the Petroleum Building, as shown in Figure B-10.

Views of the Modified Design Alternative would be blocked from more distant locations along the public viewing corridors. Nearby views of the Project Site would be characterized by the pedestrian oriented ground level design adjacent to the Project Site. From more distant and/or elevated locations, the overall massing of the Project would be substantially reduced with the elimination of one of the three towers. The remaining two towers would blend into the Downtown milieu in a manner similar to that of the Project, but would occupy a smaller component of the Downtown skyline. (Figure A-13).

The Draft EIR Chapter 4.0 analysis of the Project's impacts on aesthetics evaluates the Project impacts against threshold guidelines in the L.A. CEQA Thresholds Guide for informational purposes. As indicated in that analysis, pursuant to SB 743, an analysis of aesthetic/visual resources impacts of the Project is not required; and is provided for informational purposes only.

The analysis of the Project addresses impacts regarding construction and operations. The analysis of construction impacts discusses the disturbance in site appearance that would occur during construction (construction equipment, excavation activities, cranes and incomplete buildings). The analysis concludes that construction impacts would be less than significant because construction fencing would provide visual screening of the site; and the impacts would be short-term and temporary, not substantially altering, or degrading, the long term visual character of the surrounding area or the existing Project site. This conclusion would also be applicable to the Modified Design Alternative.

The informational, L.A. CEQA Thresholds analysis of the Project's aesthetic and views impacts indicates that the Project would include new contemporary modern buildings, new landscaping, public plazas, artwork, street front commercial uses, and other amenities. The analysis concludes that the Project would be compatible with surrounding development, would maintain views of the primary facades of the adjacent Petroleum Building, and would not result in a substantial material change to the integrity and significance of that historic building. The Project would not substantially alter or degrade existing scenic resources, and would not substantially obstruct or degrade an existing recognized and valued public view of view resources. For these reasons, the analysis of impacts on Aesthetics and Views concludes that the impact of the Project would not exceed applicable thresholds of significance. Furthermore, the impacts are not considered significant under CEQA pursuant to SB 743.

Impacts of the Modified Design Alternative are not significant pursuant to SB 743 and as analyzed would not exceed the City's standard thresholds for evaluating aesthetic and view impacts. The Modified Design

Alternative would have generally similar design features to those of the Project, with the above cited variations that would add increased articulation to buildings, reduce signage and lighting, enhance the streetscape with increased plaza space, increase spaces between Project buildings and adjacent uses, and provide more views over and through the Project Site. Because the aesthetic character of the Modified Design Alternative would be akin to that of the Project and the variations in massing and streetscape features enhance the Project appearance, the Modified Design Alternative's impacts would be reduced in severity when compared to those of the Project. Impacts regarding changes to views of valued focal or panoramic views across the Project Site would be less than those of the Project. Overall impacts of the Modified Design Alternative on aesthetics and views, like those of the Project, would not exceed City significance thresholds and are not considered significant under CEQA pursuant to SB 743.

ii. Light and Glare

Construction activities are anticipated to occur during daylight hours and construction-related illumination, if needed would be used for safety and security purposes only. Such lighting would be shielded and directed onto the Project Site, and security fencing would also screen such light sources.

Once constructed and in operation, the Modified Design Alternative would include lighting for signage, commercial and architectural accents, wayfinding, and security. Signage would include various sign forms including wall signs, digital displays and streaming signage, supergraphic signs, building identification signs, and wayfinding signage, but it would not include open panel roof signs. The proposed location of the signage is summarized in Figure B-7. Elimination of Residential Tower 1 would result in less lighting from the residential interiors and from the two small building ID signs formerly located at the top of that tower.

The Modified Design Alternative includes substantial reductions in the amount of signage from that of the Project. Approximately 77 percent of the signage that would be provided is in the form of digital display signs located in a band along the Podium facades facing W. Olympic Boulevard, Figueroa Street and 11th Street. The amount of digital display signage has been reduced from approximately 60,000 square feet to approximately 21,200 square feet, a reduction of 63 percent, with reductions in signage height as well as area.

The key differences in the signage program from that proposed for the Project include breaking up the Project's continuous ribbon of digital display signs over the retail uses into discrete signs with spacing between. The resulting digital display signage would include approximately 1,425 square feet on W. Olympic Boulevard, 13,869 square feet on S. Figueroa Street, and approximately 1,650 square feet on 11th Street (as well as a 258 square foot Hotel wall sign). The changes to signage on W. Olympic Boulevard represent a reduction of 85 percent from that of the Project's 9,825 square feet and the Figueroa Street reduction represents a reduction of approximately 53 percent from the Project's 29,315 square feet.

The most notable reduction in signage has been along 11th Street, where the digital display signage has been reduced from the Project's 20,235 square feet by approximately 91 percent. On 11th Street, the horizontal band of signage that formerly extended across the podium under the previously proposed Residential Tower 1 to S. Flower Street is now limited to a vertically oriented sign on the Podium façade at Figueroa Street below the Hotel Tower. The 11th Street digital display signage, reduced in height from that of the Project, would be located across from the podium structure of the Oceanwide project, and would be limited in height to a maximum of 75 feet, the approximate height of the podium of the Oceanside project. The 11th Street frontage would also include a small Hotel ID sign (approximately 258 square feet) over the Hotel entry at mid-block.

The other types of signage associated with the Project, e.g. signs for building identification and wayfinding, would be similar for the Alternative, although the Alternative would not include open panel roof signs. The Modified Design Alternative, pursuant to PDF-AES-4, would not use highly reflective materials that would cause adverse glare impacts. (PDF-AES-4 has been revised in the Final EIR with a measure that would similarly control glare impacts).

As described in the Draft EIR Section 4.A, Aesthetics Analysis, of the Project's impacts on lighting, Project construction would occur during daylight hours and construction-related illumination, if needed would be used for safety and security purposes only. Such lighting would be shielded and directed onto the Project Site, and security fencing would also screen such light sources. Construction lighting would not substantially impact residential uses, alter the character of off-site areas or interfere with the performance of an off-site activity. Therefore, artificial light impacts associated with construction would be less than significant.

Upon completion, the Project would introduce new sources of lighting, notably associated with wall signs, digital displays and animated signage, supergraphic signs, hotel building identification, residential building identification, retail and restaurant building identification, parking entry identification, loading dock entry identification, and wayfinding signage, and open panel roof signs. The analysis of lighting for the Project is based on a Lighting Technical Study included in Appendix B to the Draft EIR, that evaluates impacts of two signage programs, Signage Alternative A and Signage Alternative B. The study concludes that the graphics and signage program would support an active street front experience on all sides, but particularly along the Figueroa corridor that would mix art and signage graphic components. It also concludes that the Project would not create a new source of light or glare that would substantially alter the character of off-site areas surrounding the Project Site, such as LA LIVE or the Staples Center, which currently experience high illuminance levels, and because the Project would not increase a lighting intensity greater than three foot-candles above ambient lighting as measured at the property line of the nearest residentially zoned property, impacts would be less than significant. Furthermore, the Project's lighting impacts would be less than significant pursuant to SB 743.

Construction lighting for the Modified Design Alternative would be similar to that of the Project and would also not substantially impact residential uses, alter the character of off-site areas or interfere with the performance of an off-site activity; and would also be less than significant. The lighting for the Modified Design Alternative during operation, has been evaluated in a Supplemental Lighting Technical Study, included as Appendix D, of the Final EIR. Based on a maximum surface illuminance of 200 cd/m^2, the Supplemental Lighting Technical Study determined that the Modified Design Alternative would also not exceed three foot-candles at a residential use; and the Modified Design Alternative's reduction in signage would result in a notable reduction in the amount of lighting being emitted at the Project Site. For example, Tables 7 and 8 of the Project's Lighting Technical Study in signage Appendix B of the Draft EIR show that average vertical plane illuminance increases at Receptor Site R1-b would be 3.24 fc at the podium level under the Project's Signage Alternative A and 6.83 fc at the podium level under the Project's Signage Alternative B. For the Alternative 4, Table 5 of the Supplemental Technical Report indicates an increase in vertical plane illuminance would be only 0.1 fc at the same location. Receptor Site R1-b is located to the south of W. 11th Street just to the south of the Project Site. As illustrated in Table 5 of the Supplemental Technical Report, the Modified Design Alternative would also result in substantial decreases in the Project's Signage Alternative A and Signage Alternative B projected foot-candle levels at residential sites to the north and east of the Project Site. Impacts associated with light and glare would be less than significant relative to foot-candle increases, and because the scale of signage would be substantially reduced compared to the Project, this Alternative 4 would generate considerably less light and glare, with a resulting decrease in impacts in comparison to the Project. Other Project lighting, such as accent, building identification and

wayfinding lighting would be similar to the Project, resulting in a substantial net reduction in lighting. Building materials would be similar to those of the Project, with similar reflective and glare characteristics. In both cases, the reflectivity of the glass would be limited pursuant to PDF-AES-4, inclusive of materials review by the Department of Building and Safety. Impacts of the Modified Design Alternative regarding light and glare would be less than that of the Project and like the Project would not exceed City thresholds. Furthermore, lighting impacts are not considered significant pursuant to SB 743.

iii. Shade/Shadow

The construction of the Modified Design Alternative would initially be below grade, later at lower levels, and in time would include the development of towers that could cast shadows on adjacent uses. During construction the heights and massing of the structures would be less than with the completion of the structures, and would be a component to the overall shading of the Modified Design Alternative as discussed below.

The Modified Design Alternative would have reduced shading impacts compared to the Project due to the removal of Residential Tower 1. The reduction in shading would be most noticed to the north and northeast areas of the Project Site. With similar building heights to Residential Tower 2 and the Hotel Tower, the alternative's shadows to the west and north would be similar to those of the Project. Those towers would have locations that would be no closer to the edges of the Project Site than the Project's proposed residential and hotel towers. Therefore, the extent and time duration of the shadow cast from those buildings on shadow-sensitive uses would be similar to those of the Project.

The analysis of Project impacts on shading indicates that the Project would not shade shadow-sensitive uses for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. PST, or more than four hours between the hours of 9:00 a.m. and 5:00 p.m. PDT. Therefore, shade/shadow impacts would be less than significant. The Project analysis also noted that shading from the Project in conjunction with cumulative project #116 would cause shading on outdoor recreational areas at the Hotel Figueroa that would exceed the three hour shading threshold during winter solstice; however, this was not considered a significant cumulative impact due to the mixed-use residential character of the Project, its location within an urban transit priority area, and exemption under SB 743 per the City of Los Angeles Zoning Information File ZI No. 2452. The elimination of Residential Tower 1 would not reduce this particular shading condition.

Changes to shading impacts due the Modified Design Alternative's variations in building massing would result in reduced shadow impacts relative to the Project, and like the Project would also be less than significant pursuant to SB 743.

(2) Air Quality

i. Construction

The Modified Design Alternative would require a construction program similar to that of the Project, inclusive of demolition, excavation, foundation placement, building construction, and paving. The general construction activities would be similar to those of the Project. The total building volumes would be similar to those of the Project. However, deeper excavation from approximately 45 feet/50 feet with the Project, to 65 feet with the Alternative, would increase the amount of excavation materials from approximately 202,000 cubic yards of soil to approximately 254,300 cubic yards of soil: an increase of approximately 26 percent. The added excavation would be performed under the same daily protocols (i.e. a similar number of haul

trucks per day) as the Project; however; the length of the excavation period would be extended for up to approximately 23 days during Phase 1 and up to approximately 16 days during Phase 2, which would result in approximately the same daily truck trips as the Project.[1]

Under the Modified Design Alternative, demolition of the existing paved area at the southern end of the Project Site would occur near the beginning of construction activities, followed by grading and excavation for Phase 1. After the completion of demolition, grading, and excavation, construction of the Modified Design Alternative would proceed with the hotel building construction and finishing activities under Phase 1. The residential tower (referred to as Residential Tower 1 under the proposed Project) in the southeast portion of the Project Site would not be constructed under the Modified Design Alternative. However, while the number of hotel rooms would remain the same as the Project, the amount of space for ancillary hotel uses (banquet, conference, and amenity areas) would be increased. Overall Phase 1 would result in the construction of reduced building floor area under the Modified Design Alternative as compared to the Project. As a result, the Modified Design Alternative would generate the same daily building construction activity levels as the Project, but would require fewer days of building construction as compared to Phase 1 of the Project. Phase 2 (after the completion of Phase 1) would proceed similar to the proposed Project and commence with demolition of the existing hotel followed by grading and excavation for Phase 2. After the completion of demolition, grading, and excavation, construction of the Modified Design Alternative would proceed with the residential tower building construction and finishing activities under Phase 2. The residential tower would be the same height as the proposed Project; however, the Modified Design Alternative would fit ~~48~~ 49 floors of residential development into the tower's interior space in contrast to the 38 floors proposed for the Project. Overall Phase 2 would result in the construction of greater building floor area under the Modified Design Alternative as compared to the Project. As a result, the Modified Design Alternative would generate the same daily building construction activity levels as the Project, but would require more days of building construction as compared to Phase 2 of the Project.

The maximum daily construction emissions under the Modified Design Alternative would be similar to the Project as similar types and numbers of construction equipment and haul trucks would be used on a daily basis; however, the Modified Design Alternative would require additional days of grading activity during Phase 1 and Phase 2, fewer days of building construction activity during Phase 1, and greater number of days of building construction activity during Phase 2 as compared to the Project. Overall, for the combined Phase 1 and Phase 2 construction period, the Modified Design Alternative would require additional days of excavation and grading activity but a slightly fewer total number of days of building construction activity compared to the Project, given the reduced total building floor area.

The analysis in Section 4.B., Air Quality of the Draft EIR, indicated that the Project would emit regional and localized construction emissions below the SCAQMD daily numeric thresholds across applicable pollutants; and that the impacts of the Project would be less than significant. As construction activity on a daily basis would remain similar to the Project, the maximum daily construction emissions under the Modified Design Alternative also would remain below the regional and localized significance thresholds. As a result, regional

[1] *Actual number of extended excavation period days may be less than 23 days during Phase 1 and less than 16 days during Phase 2 based on refinements to the total additional excavated volume. Preliminary estimates for this Alternative were conservatively estimated at approximately 292,000 cubic yards; however, more detailed engineering estimates for the Modified Design Alternative became available and the amount has been refined to 254,300 cubic yards incorporating the most up-to-date steel structure basement design. The air quality and GHG emissions assessment utilizes the higher preliminary volume, which results in a conservative impact assessment, but does not alter the impact determination relative to the proposed Project.*

and localized air quality impacts under the Modified Design Alternative would be similar to the proposed Project, and like the Project, would be less than significant.

The air quality analysis for the Project provided in Section 4.B, Air Quality, of the Draft EIR, evaluated the Project's contribution to potential health risks due to construction activities through the preparation of a Health Risk Analysis (HRA). The Project would include implementation of Project Design Features, such as the use of off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 hp or greater, that are consistent with state regulatory plans to reduce diesel-related emissions and that would minimize construction-related emissions. The analysis of the Project's contribution to health effects indicates that the Project (inclusive of construction activities and operations) would have a less than significant impact from toxic air contaminant (TAC) emissions. The Project's HRA concluded that the potential maximum carcinogenic risk for off-site sensitive receptors would be approximately 8 in one million, in contrast to a threshold of 10 in one million. The Modified Design Alternative would incorporate similar Project Design Features that would minimize emissions in a manner similar to that of the Project. At the same time, the Modified Design Alternative would include a slight increase in construction activity in the early stages of construction due to site grading and excavation over a longer duration, slightly increasing health risk impacts compared to the proposed Project.[2] The Modified Design Alternative would result in health risk impacts of approximately 8.1~~8.0~~ in one million, compared to 7.5 in one million for the Project, which would still be below the significance threshold of 10 in one million (see Appendix G for detailed calculation sheets). In addition, the Modified Design Alternative would result in similar chronic health risk impacts of the Project of approximately 0.01 or less, well below the significance threshold of 1.0. Therefore, the Modified Design Alternative would result in slightly greater construction health risk impacts than the Project, but like the Project, impacts would be less than significant.

Similar to the Project, construction of the Modified Design Alternative would be consistent with the AQMP. The Modified Design Alternative would require the use of off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards, which would be consistent with construction emissions strategies in the AQMP, which are intended to reduce emissions from heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The Alternative would not conflict with implementation of these strategies. Additionally, the Alternative would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Alternative would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. In addition, and similar to the Project, the Alternative would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP are based.

[2] *Increasing the construction activity during the early stages of construction is generally associated with a potential increase in health risk impacts due to the potential for early age exposure to construction-related TAC emissions. According to the Office of Environmental Health Hazard Assessment (OEHHA), Guidance Manual for Preparation of Health Risk Assessments (2015), the early age exposure is higher than adult exposures due to increased breathing rates, fraction of time spent at home, and age sensitivity factors.*

ii. Operations

The Modified Design Alternative's development program would include the same uses and Site activity as the Project. However, the Modified Design Alternative would result in 215 fewer residential units and approximately ~~24,501~~ 21,041 square feet less commercial and restaurant space compared to the proposed Project. The Modified Design Alternative would retain the same number of hotel rooms as the Project. As a result, the alternative would generate fewer vehicle trips to the Project Site and result in fewer overall vehicle miles traveled (VMT) than the Project with approximately 4,859 daily trips at full buildout under this alternative compared to 6,583 daily trips at full buildout under the Project (without TDM program), as shown in Table 5-13, below. The Modified Design Alternative would also result in reduced building floor area as compared to the Project. Therefore, the Modified Design Alternative would result in reduced interim year and full buildout year operational emissions as compared to the Project. Air quality impacts from operational air pollutant emissions from the consumption of energy (i.e., natural gas), landscaping, use of consumer products, and mobile sources for transportation to and from the Project Site would be less than the Project. Similar to the Project, the Modified Design Alternative would result in less than significant regional and localized operational air pollutant emissions. The Modified Design Alternative would also have a less than significant contribution to CO hotspots and would result in reduced impacts from the Project due to the reduction in overall VMT. The Modified Design Alternative would implement the same Project Design Features as the Project, which would include a number of green building measures that would minimize operational emissions related to the consumption of energy and from mobile sources.

Similar to the Project, the Modified Design Alternative would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, the operation of the Modified Design Alternative would not be considered a substantial source of diesel particulates. The restaurant uses could potentially generate TACs if charbroiling activities occur at the restaurant, which has the potential to generate small amounts of chemicals that are known or suspected by the State of California to cause human health impacts.[3] However, restaurant charbroiling in the Air Basin would be required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers. The emissions controls would reduce the already small amounts of TAC emissions associated with charbroiling by approximately 83 percent,[4] such that adverse health impacts are not expected to occur at nearby sensitive receptors. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the Modified Design Alternative. Similar to the Project, operational TAC impacts under the Modified Design Alternative would be less than significant.

Similar to the Project, operation of the Modified Design Alternative would be consistent with the AQMP. The FAR of ~~7.4:1~~ 8.03:1 would be below the maximum FAR of 13:1. The Modified Design Alternative would therefore be consistent with the growth projections as contained in the City's General Plan and consistent with the growth projections in the AQMP. The Modified Design Alternative would also support measures related to reducing vehicle trips for patrons and employees and increasing commercial density near public transit. As the Modified Design Alternative would be consistent with the growth projections in the AQMP

[3] *U.S. Environmental Protection Agency, Polycyclic Aromatic Hydrocarbons (PAHs), January 2008, https://archive.epa.gov/epawaste/hazard/wastemin/web/pdf/pahs.pdf. Accessed April 2017.*

[4] *U.S. Environmental Protection Agency, Methods for Developing a National Emission Inventory for Commercial Cooking Processes: Technical Memorandum, (2003).*

and would support relevant Transportation Control Measures aimed at reducing vehicle trips, impacts would be less than significant, similar to the Project.

(3) Cultural Resources

i. Archeological Resources and Tribal Cultural Resources

The Modified Design Alternative would require the implementation of a construction program similar to that of the Project. However, the maximum depth of excavation would be increased from approximately 45 feet/50 feet to 65 feet. The recorded history of the Project Site identifies a range of urban uses that would not require deep excavations. The Geotechnical Engineering Investigation for the Project, Appendix C-1 of the Initial Study in Appendix A of the Draft EIR, indicates that fill materials at the Project Site extend to approximately eight feet and that undisturbed soils lie beneath that level. Therefore, it is not likely that past activity extended below the Project's 50-foot depth. Accordingly, the increased depth of excavation would occur below the expected depth of potential Archeological and Tribal Cultural Resources.

The Project would involve excavations into soils with the potential to contain resources associated with former turn of the 20th century residential uses on the Project Site. If such resources were to be present, potentially significant impacts on archaeological resources could occur unless mitigation measures were implemented. Mitigation measures are recommended that require monitoring of excavation activities with treatment, reporting and curation of resources should they be encountered. These measures would reduce impacts to less than significant levels. Further, as described in Section 4.C.1, Cultural Resources, Archaeological and Paleontological Resources, tribal consultation was carried out per the requirements of AB 52. No evidence was presented that tribal cultural resources exist at the Project Site; and therefore the Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

Should the 20th century residential use resources or unknown tribal resources be present at the Project Site, they are likely to be closer to the surface in the area of the Project Site; and above the Alternative's deeper excavation level (i.e. 50 feet or less below grade). The same mitigation measures would be implemented should resources be encountered.

Therefore, impacts of the Modified Design Alternative on archaeological and tribal cultural resources would be similar to those of the Project, and like the Project, would be less than significant with mitigation.

The City carried out its analysis pursuant to the requirements of AB 52. Subsequent to the completion of the Final EIR, comments were submitted to the City by Andrew Salas, Chairman, Gabrieleno Band of Mission Indians - Kizh Nation.[5] This information pertains to the Zanja Madre (Mother Ditch) which is a component of the City's first municipal water system whose initial construction dates back to the founding of Los Angeles in 1781. Other segments were added in the 19th century and it was abandoned as a City water system around 1904. According to the 1884 Stevenson Tract Map of Los Angeles (http://www.bigmapblog.com/2012/stevensons-survey-of-los-angeles-1884/) and historic photographs (http://www.westadams-normandie.com/sites/westadams-normandie.com/files/lapl/old_west_adams.php),

[5] *Mr. Salas provided links to the following websites: http://www.westadams-normandie.com/sites/westadams-normandie.com/files/lapl/old_west_adams.php; https://www.google.com/amp/s/la.curbed.com/platform/amp/2016/4/28/11490196/zanjas-los-angeles-history-water; https://www.google.com/amp/www.latimes.com/local/la-me-mother-ditch-20140422-story.amp.html.*

a segment of the Zanja system was formerly located along the sidewalk on the western side of Figueroa Street and was known as Zanja No. 8-R. According to Gumprecht (2001), Zanja No. 8-R was originally constructed as an earthen ditch and was later improved as a concrete conduit in the 1880s. Since it ran along the sidewalk on the western side of Figueroa Street across from the Project Site, any remnants of it that may still exist are not expected to be impacted by the Project. Further, it is unlikely that any prehistoric archaeological resources (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) are located within the Project Site as they have likely been displaced by past construction and development activities at the Project Site. Moreover, although the proposed excavations are likely to extend to a depth (excavations would reach up to 65 feet below grade under the Modified Design Alternative) that has yet to be disturbed by former development activities at the Project site, it is still unlikely that any prehistoric archaeological resources would be encountered since the deposits at these depths would likely be too old to be conducive to retaining archaeological resources.

Given the nature of public concerns regarding tribal cultural resources, the City has proposed a Condition of Approval for the Project to clarify procedures to be followed in the event a potential tribal cultural resource is encountered during construction. If such resources were to be encountered during construction of the Project, the archaeological monitor required under the Project's mitigation measures would notify the City who would subsequently implement the Conditions of Approval regarding inadvertent tribal cultural resource discoveries. These conditions include halting construction in the vicinity of the find and notifying Naïve American groups and soliciting input from them regarding treatment of the discovery.

The proposed Condition of Approval is as follows:

Proposed Condition of Approval

- In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities[6], 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 project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1454.

  - If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

  - The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.

[6] *Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity*

- The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.

- The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

- 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.

ii. Paleontological Resources

The Modified Design Alternative would have a construction program similar to the Project's. However, the maximum depth of excavation would increase from approximately 45 feet/50 feet to 65 feet. Accordingly, more excavation would occur into native soils and greater potential to encounter/disturb paleontological resources in the event they exist under the Project Site.

The analysis of the Project's impacts on paleontological resources indicates that Project grading and excavation may encounter native soil/sediment associated with older Quaternary Alluvium, the Fernando Formation, and the Puente Formation deposits below the previously disturbed ground surface levels. These formations have high potential for containing buried paleontological resources. As a result, the potential exists for construction to directly or indirectly destroy buried unique paleontological resources or sites or unique geologic features. Impacts to buried paleontological resources are considered potentially significant. Therefore, the Project includes mitigation measures to avoid adverse effects on paleontological resources. These measures would include a monitoring program and treatment/curation of discovered fossils.

The difference in the likelihood of encountering paleontological resources between the Project and Alternative 4 would be minimal. As was the case for the Project, mitigation measures would be implemented for monitoring, and treatment/curation of discovered fossils. With mitigation, encountering of resources would allow for new resource recovery, and impacts would be similar to those of the Project. As was the case with the Project, impacts would be less than significant with mitigation.

iii. Historical Resources

The Modified Design Alternative would demolish the existing Luxe Hotel and replace it with a new residential, hotel, and commercial mixed-use Project with new towers and a Podium. The location of these structures would be substantially similar to that of the Project, however the residential tower at 11th Street and Flower Street would be eliminated. Increased spacing between the remaining Residential Tower and the Petroleum Building would provide a larger buffer space between the Project building and the historic structure and provide a larger viewing angle of the wall sign on the western façade of the Petroleum Building.

As described in Section 4.C.2., Historical Resources of the Draft EIR, the Luxe Hotel does not qualify as a historical resource under CEQA. Because the Luxe Hotel is not a historical resource, no impacts associated with the demolition of the Luxe Hotel building would occur. However, the analysis of Project impacts during construction concluded that vibration impacts on the Petroleum Building have the potential to exceed a vibration threshold should the consent of the property owner not be secured for the installation of continuously operational automated vibrational monitors on the Petroleum Building as prescribed in recommended Mitigation Measure MM-NOISE-2. Therefore, direct impacts of the Project on the Petroleum Building were conservatively concluded to be significant and unavoidable.

Further, the analysis of Project impacts concluded that the Project would not create changes in the Project vicinity that would reduce or materially impair the integrity or significance of important nearby historical resources. Notably, the primary elevations of the Petroleum Building fronting W. Olympic Boulevard and S. Flower Street would not be affected by the Project and would remain fully visible from the public right of way. The Project would be set back along W. Olympic Boulevard to maintain views of the west corner and west façade of the Petroleum Building and Residential Tower 2 would be set back 20 feet from the west elevation of the Petroleum building to create a buffer between the Petroleum Building and Residential Tower 2; and the digital signage is similar to other signage placed along S. Figueroa Street, displayed at LA LIVE and 717 W. Olympic Boulevard. Therefore, the Project's indirect impacts would be less than significant.

The Modified Design Alternative would have a generally similar appearance to the Project and relationship to surrounding buildings, with the exception of the greater separation provided from the Modified Design Alternative and the Petroleum Building. The Modified Design Alternative would increase the spacing between the Podium and the Petroleum Building from 0 feet to approximately 20 feet as well as decrease the height of the Podium at that location from 75 feet to 55 feet, and it would increase the spacing between Residential Tower and the Petroleum Building from approximately 20 feet to approximately 38 feet. This reduction in massing next to the Petroleum Building would allow a larger view corridor of the wall sign on the west facade of the Petroleum Building from Olympic Boulevard. Therefore, indirect impacts would be less than the already less than significant impacts of the Project. Direct impacts of the Modified Design Alternative would be similar to those of the Project. Demolition of the Luxe Hotel would not be significant; however, vibration damage to the Petroleum Building could remain potentially significant, as with the Project. The Project's Mitigation Measure MM-Noise-2 also would be recommended for the Modified Design Alternative; however as is the case with the Project, its implementation cannot be assured and therefore the direct impact would be considered potentially significant.

(4) Greenhouse Gas Emissions

The Modified Design Alternative would generate GHG emissions due to construction and operational activities. Similar to the Project, construction would generate GHG emissions from fossil fuel combustion

from heavy-duty equipment, haul trucks, concrete trucks, worker trips, and vendor delivery trips. The amount of excavation would increase under this Alternative and would require more haul truck trips compared to the Project; however, the overall construction period would require a slightly fewer total number of days of building construction activity compared to the Project. These factors would generally offset and not result in a substantial change in overall construction-period GHG emissions. When amortized over a 30-year lifetime, construction-related GHG emissions would be similar to the proposed Project.

Similar to the Project, operational activities associated with the Modified Design Alternative would generate GHG emissions from transportation to and from the Project Site, energy consumption (i.e., electricity and natural gas), water demand, and wastewater and solid waste generation. The Modified Density Alternative would result in 215 fewer residential units and approximately ~~24,501~~ 21,041 square feet less commercial and restaurant space compared to the proposed Project. The Modified Design Alternative would retain the same number of hotel rooms as the Project, although the amount of space for ancillary hotel uses (banquet, conference and amenity areas) would be increased. Overall, the Modified Design Alternative would result in reduced total building floor area. As a result, the alternative would generate fewer vehicle trips to the Project Site and result in fewer overall VMT than the Project with approximately 4,859 daily trips at full buildout under this alternative compared to 6,583 daily trips at full buildout under the Project (without TDM program). Therefore, GHG emissions associated with transportation, energy consumption, water demand, and solid waste generation would be less than that of the Project.

Similar to the Project, the Modified Design Alternative would generate GHG emissions from construction and operational activities; however, the net increase in annual GHG emissions, directly and indirectly, would be consistent with the City of Los Angeles LA Green Plan and Sustainable City Plan. The Modified Design Alternative would exhibit the same land use characteristics as the Project, such as providing a mix of uses in an urban infill location close to other residential and commercial uses, locating uses within a quarter mile of public transit including the Metro Blue and Expo Lines, and improving the on-site pedestrian environment, and result in the same level of transportation and location efficiency. In addition, the Modified Design Alternative would implement the same energy and water efficiency features as the Project including exceeding energy and water efficiency building standards and implementing United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED)-equivalent measures, resulting in similar levels of GHG reductions associated with transportation, energy, and water efficiency. Therefore, as the Modified Design Alternative would be consistent with the applicable City goals and actions for reducing GHG emissions, GHG emissions and associated impacts would be less than significant. Further, similar to the Project, the Modified Design Alternative would be consistent with the AB 32 goals and CARB guidelines for assessing GHG emissions, and with State, Regional and Local regulations for reducing GHG emissions. The Modified Design Alternative would be consistent with and support the goals and benefits of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them."[7] According to SCAG, incorporating "smart land use strategies encourages walking, biking, and transit use, and therefore reduces vehicular demand" and associated pollutants.[8] Additionally, the SCAG RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where [people] can live and work that include a pleasant and convenient

[7] *Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 113.*

[8] *Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 39.*

walking environment that reduces their reliance on their car."[9] Therefore, as the Modified Design Alternative would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, impacts regarding greenhouse gas reduction plans would be less than significant.

Compared to the proposed Project, the Modified Design Alternative would locate a fewer number of on-site residents and employees in proximity to the extensive public transportation hub within the Downtown area, and a reduced population in proximity to other nearby commercial and entertainment uses, and nearby office buildings and other job centers as compared to the Project. Therefore, while this Alternative would support reductions in regional vehicle miles traveled, as well as reductions in air pollutant and GHG emissions generated by regional vehicle trips, as it remains an infill and transit-oriented development, this Alternative would support the SCAG RTP/SCS strategies to a slightly lower degree as the Project, which would locate a slightly greater number of on-site residents and employees to the Project Site. As is the case with the Project, impacts caused by GHG emissions would be less than significant. The Modified Design Alternative would result in less than significant GHG impacts, but have a slightly greater impact with respect to consistency with GHG reduction strategies compared to the Project.

(5) Hazards and Hazardous Materials

The Modified Design Alternative would include construction activities and operations uses that are similar to those of the Project. The construction program would include demolition, excavation, foundation preparation, building construction, and paving. At the same time, the depth and amount of excavation would be increased over that of the Project. The operations activities, i.e. the residential, hotel and commercial site uses, would require products routinely used for everyday household and retail activities consistent with regulatory requirements, similar to the Project. The Modified Design Alternative would not require the use of hazardous materials beyond these routinely used household/commercial products.

The analysis within Section 4.E., Hazards of the Draft EIR concluded that the Project's use of potentially hazardous materials during Project construction and operations would include routinely used and regulated products associated with development of residential, hotel and retails uses. Materials would be used in small quantities and in accordance with manufacturers' instructions for the use, storage, and disposal of such products. The Project would not require the use of or otherwise generate hazardous waste materials. Therefore, impacts due to operations would be less than significant.

The analysis of the Project also identified several potential Site conditions that could result in significant impacts during construction if not properly addressed through regulatory measures and mitigation measures. Demolition of the Luxe Hotel building could provide an exposure to Asbestos Containing Materials (ACMs), Lead Based Paint and/or Polychlorinated Biphenyls (PCBs). The identification, handling, removal, and/or disposal of ACMs and LBP would be completed in compliance with regulatory requirements, thereby resulting in a less than significant impact. Further, the Project's location in an LADBS designated Methane Hazard Area (Methane Zone), containing methane gas in soil samples would also be addressed through regulatory measures. A methane mitigation system designed in accordance with Division 71 of LAMC Section 91.7104 would be incorporated into the Project structures to provide for the public safety. This would reduce potential impacts associated with methane beneath the Project Site to a less than significant level.

[9] *Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 112.*

Further, the Draft EIR determined that excavation would encounter contaminated soils and abandoned fuel facilities, which if not properly handled in accordance with applicable federal, state, and local regulations, could expose people to contaminants, resulting in a potentially significant impact. Excavation of the Project Site could also pose a risk to construction workers and future building occupants due to soils with pollutant concentrations above federal and state remediation levels. Lastly, unknown hazardous materials may be present in untested areas of the Project Site beneath existing structures. The Project would include mitigation measures to reduce these potentially significant hazardous conditions to less than significant levels. These measures require preparation and implementation of a Soil Management Plan, a Health and Safety Plan, and additional subsurface soil and a soil gas sampling and testing in accordance with the recommendations of the *Soil and Soil Gas Investigation* Technical Report contained in Appendix F of the Draft EIR.

Because hazards could arise from the conditions on the Project Site, the Modified Design Alternative would still encounter the same potentially hazardous site conditions as the Project, and would be required to comply with these same regulations and implement the same mitigation measures to reduce the potential impacts. While the depth of excavation would be increased, all excavation would be subject to the soil and gas sampling and testing called for in the mitigation measures and handling in compliance with the Soil Management Plan and Health and Safety Plan. During operations, the future Project Site population would use routinely used and regulated products similar to those of the Project. Impacts of the Modified Design Alternative on Hazards and Hazardous materials would be similar to those of the Project, and as is the case with the Project, would be less than significant with mitigation.

(6) Land Use and Planning

The Modified Design Alternative would reduce the size of the Project from 1,129,284 square feet to ~~860,121~~ 936,712 square feet, resulting in an FAR reduction from 9.7:1 to ~~7.4~~ 8.03:1. While the amount of development has been reduced, the types of development would be similar to those of the Project, with residential units, hotel rooms with ancillary hotel uses and commercial retail/restaurant uses. It would include a somewhat similar massing of development with the provision of two towers located atop a podium with ground-level retail uses and interspersed pedestrian plazas.

The elimination of one tower at the corner of 11th Street and S. Flower Street would alter the massing of development, but would not alter the types of uses provided or the general land use relationships of the Project to its vicinity. The elimination of the tower would be noticeable from more distant and/or elevated locations and result in a slightly less dense appearance in the downtown skyline. Elimination of the tower would allow continued views over the Project Site at elevations higher than 75 feet from the adjacent area currently occupied by the El Cholo Restaurant and the Petroleum Building on the north side of the Project Site and from the residential component of the Oceanwide project, atop its own podium, across from the Project Site on 11th Street.

The remaining two towers would have similar massing and the same maximum heights as the Project towers. The Hotel Tower would continue to be located on the southwest portion of the Project Site directly across S. Figueroa Street from the Staples Center Arena; and the remaining Residential Tower would be located at the north side of the Project Site at Olympic Boulevard and Figueroa Street. The first 55 feet to 75 feet of development above grade would still be comprised of the Podium. The first and second above grade levels of the Podium would include retail, restaurant, and other commercial uses, with ancillary hotel uses extending into the Podium along 11th Street to S. Flower Street. The Podium height below the remaining Residential Tower would be reduced from 75 feet to 55 feet in height. Parking would continue to be

provided in a subterranean structure. The ground level structures have been redesigned to add architectural modulation to the Alternative's appearance at street level. Ground level plaza area has been increased from 5,000 square feet to 7,700 square feet; and setbacks between the remaining residential tower and the Petroleum Building have been increased (increasing the spacing between the Podium and the Petroleum Building from 0 feet to approximately 20 feet, with a decrease in the Podium height from 75 feet to 55 feet, and an increase in the spacing between the Residential Tower and the Petroleum Building from approximately 20 feet to approximately 38 feet). This modulation is best illustrated on Figure B-8, which shows the variations along Figueroa Street. Other representations are shown in Figures, B-2, B-3, B-9 and B-10. These modifications in the Alternative address provisions of the Downtown Design Guide intended to create a more coherent downtown milieu with enhanced linkages between individual developments. The added ground level plaza area and building modulation would improve the quality of pedestrian connectivity with adjacent development, including LA LIVE, Staples Center Arena, and the Los Angeles Convention Center (LACC). The increase in space between the Residential Tower with its underlying Podium and the Petroleum Building would widen the pedestrian view corridor, further setting off the wall sign on the Petroleum Building. The Figueroa Street Plaza may provide for a potential mid-block linkage to S. Flower Street in the future should adjacent landowners chose to complete that opportunity, thus supporting Section 07.2 of the Downtown Design Guide. An outdoor roof terrace for hotel guests on top of the Podium structure would feature a pool deck, seating areas, and green space that would be periodically used for outdoor events providing an outdoor visual linkage to the surrounding area for hotel guests.

As noted above, the Modified Design Alternative would have less development than the Project. The amount of residential development would be reduced from 650 units to 435 units, a reduction of 215 units. The proposed 300 hotel units would be the same as the Project's; however, there would be a net increase of 3,915 square feet in the hotel's banquet, conference and amenity facilities. The amount of commercial space would be reduced from 80,000 square feet to ~~55,499~~ 58,959 square feet, a reduction of ~~24,501~~ 21,041 square feet. The open space for Project residents would also be reduced along with the reduction of the on-site population.

The analysis of Project impacts in Section 4.F, Land Use of the Draft EIR, evaluates the land use impacts of the Project's FAR of 9.7:1 requiring floor area transfer pursuant to the City's LAMC TFAR provisions; with 650 residential units, a 300 room hotel with banquet, conference, and amenity areas, and 80,000 square feet of commercial retail/restaurant space along the periphery of S. Figueroa Street, 11th Street, W. Olympic Boulevard, and S. Flower Street. Other Project characteristics taken into account in the analysis includes the Podium Garden Terrace and a rooftop amenity deck that would provide open space amenities for use by residents and hotel guests, including recreation facilities, recreation rooms and open space amenity.

As described in Section 4.F, Land Use of the Draft EIR, the analysis concluded that the Project would be substantially consistent with and would not substantially impede implementation of adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This conclusion is based analysis of Project consistency with applicable policies of the General Plan Framework, Do Real Planning, Walkability Checklist, Central City Community Plan, City Center Redevelopment Plan, LASED Streetscape Plan, My Figueroa Plan, LAMC, 2010 Bicycle Plan and Mobility Plan 2035, and SCAG's 2016 RTP/SCS. The Project's requested entitlements regarding TFAR, Conditional Use Permits, Vesting Tentative Tract Map, Site Plan Review, and Project Permit Compliance with a new Sign District. With approval of the proposed entitlements, the Project would be consistent with applicable plans and regulations, and impacts would be less than significant.

Key features of the Project that support the conclusion that land use impacts would be less than significant includes the following:

- The Project would provide a mixed-use development within the high quality transit area with access to the Metro Blue, Red, and Purple Lines; and multiple bus and shuttle lines. The City and SCAG have been promoting development patterns that will reduce vehicle miles traveled, providing reductions in energy consumption and air quality emissions, as well as convenience for commuters.
- The Project would provide needed housing to the region and the Downtown area, as well as visitor-serving uses at a scale and intensity that distinguishes and uniquely supports and identifies the Downtown Center. This includes hotel development in proximity to LA LIVE, Staples Center Arena, and the LACC.
- The Project would build upon and support the vibrancy of the Downtown Center and proximity to LA LIVE, Staples Center Arena, and the LACC and would bring and encourage further investment in the area. It would provide a pedestrian friendly street frontage with pedestrian access to commercial and restaurant frontage along the periphery of the property and an approximately 5,000-square foot public plaza along S. Figueroa Street, including wide sidewalks, parkways, landscaping, and special paving.

The Modified Design Alternative provides the same general development characteristics as the Project in a substantially similar arrangement of uses. Therefore, the Modified Design Alternative would be substantially similar to the Project in regard to the above cited features that led to the conclusion that the Project's impact on Land Use would be consistent with plans and land use arrangements in the Project vicinity; and that its impacts would be less than significant.

The Modified Design Alternative would, like the Project require the use of TFAR provisions; however, the amount of transferred development would be less than that of the Project. The difference in the amount of development transferred would remain available for transfer to an alternative site. The variations in the massing of the Modified Design Alternative would not alter the Project's basic development profile of towers atop a podium with ground level retail and plaza uses. The elimination of one tower would allow increased views over/through the Project Site. Other changes in the design would add architectural modulation to the Alternative's appearance and enhanced plaza areas at street level. The changes would also enhance the visual quality of pedestrian connectivity with LA LIVE, Staples Center Arena, and LACC; and would increase the buffer between the Project and the Petroleum Building.

The variations in the amount of area assigned to each of the uses would not be sufficient to alter the overall character of the Project. The increase in the amount of ancillary hotel facilities and proposed design modifications would allow the Project to provide a more complementary program in support of the Project's connectivity with LA LIVE, Staples Center Arena, and the LACC. The reduction in the number of residential units would reduce the Project's contribution to housing development in the Downtown area; however, the large number of residential units would substantially contribute to supporting City housing policies. The variations in these land use benefits to the Downtown area would off-set and be in keeping with the overall framework of the policies noted above and the Project Objectives. While the amount of commercial space has been reduced, the role of the remaining commercial area would serve a land use function similar to that of Project. It would dedicate occupied ground level uses to a retail frontage that would face the adjacent streets and provide continuity with the retail street frontages and pedestrian grid in the Project vicinity.

In summary, the Modified Design Alternative would provide a generally similar contribution to the land development patterns in the Downtown Area as would the Project. The variations in design would improve the appearance of the Project and its interconnectivity with adjacent uses. Impacts of the Modified Design Alternative would be similar to those of the Project, and like the Project, would be less than significant.

(7) Noise

i. Construction Noise and Vibration

The Modified Design Alternative would require a construction program similar to the Project, including demolition, grading/excavation, foundation placement, building construction, and finishing/paving. The general construction activities would be similar to those of the Project, although the amount of excavation would be increase to accommodate the Alternative's subterranean parking. The added excavation would be accommodated by extending the construction schedule by approximately 23 days for Phase 1 and approximately 16 days for Phase 2.[10] The maximum construction activity that could occur on a given day, the basis for the analyses of construction noise impacts, would generally be similar. Similar to the Project, the Modified Design Alternative would result in a significant impact due to construction noise at nearby sensitive receptors (multi-family residential uses). The Modified Design Alternative would include the implementation of mitigation measures (i.e., sound barriers) to substantially reduce construction noise impacts. However, as with the Project, even with implementation of the sound barriers, noise associated with the Modified Design Alternative would be expected to increase ambient noise levels at nearby multi-family residential uses by 5 dBA or more, notably at upper floor levels, resulting in a significant unavoidable construction noise impact.

The off-site construction noise impacts under the Modified Design Alternative would be similar to the Project as the maximum daily haul truck trips and construction worker commutes would be similar. The impact criteria are assessed on a daily basis. However, because the Modified Design Alternative would require additional days of grading and excavation during Phase 1 and Phase 2, there would be more days with haul trucks traveling on roadways compared to the Project.

Similar to the Project, construction vibration under the Modified Design Alternative during Site clearing, grading, and shoring activity in the vicinity of the Petroleum Building would generate vibration levels that could potentially exceed the 0.50 inches per second PPV significance threshold for potential damage of historic building. However, mitigation measures (vibration monitoring and adjustment in construction activity if needed to reduce vibration levels and repair of the building if needed) have been proposed that, if implemented, would reduce impacts to a less than significant level. However, implementation may not be feasible because the measure requires the consent of the property owner of the adjacent Petroleum Building, and that owner may not agree, and therefore the impact under the Modified Design Alternative is considered to be a potentially significant and unavoidable impact, similar to the Project. The vibration from the construction levels at nearby locations with human activity would be sufficiently low to avoid significant impacts on human activity.

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[10] *Actual number of extended excavation period days may be less than 23 days during Phase 1 and less than 16 days during Phase 2 based on refinements to the total additional excavated volume. Preliminary estimates for this Alternative were conservatively estimated at approximately 292,000 cubic yards; however, more detailed engineering estimates for the Modified Design Alternative became available and the amount has been refined to 254,300 cubic yards incorporating the most to-to-date steel structure basement design. The air quality and GHG emissions assessment utilizes the higher preliminary volume, which results in a slightly conservative impact assessment, but does not alter the impact determination relative to the proposed Project.*

As the construction noise and vibration of the Modified Design Alternative would be similar to that of the Project on days of maximum construction activity, the noise and vibration impacts of the Alternative would be similar to those of the Project. The Modified Design Alternative would include the same mitigation measures as the Project and, like the Project, would have a significant impact on construction noise, less than significant impact from construction vibration if mitigated, but potentially significant and unavoidable impact if not mitigated, and a less than significant impact on human annoyance due to vibration.

ii. Operations Noise and Vibration

The Modified Design Alternative would generate noise levels associated with stationary and mobile (i.e. automobile trip) sources. However, the Modified Design Alternative would result in 215 fewer residential units and approximately ~~24,501~~ 21,041 square feet less commercial and restaurant space compared to the proposed Project. The Modified Design Alternative would retain the same number of hotel rooms as the Project. As a result, the alternative would generate fewer vehicle trips to the Project Site, with approximately 4,859 daily trips at full buildout under this alternative compared to 6,583 daily trips at full buildout under the Project (without TDM program). Therefore, the Alternative would generate less roadway traffic noise as compared to the Project. Similar to the Project, traffic noise impacts under the Modified Design Alternative would be less than significant. With similar Project Site uses, requirements for mechanical equipment under the Modified Density Alternative would be similar to the Project and the impacts on noise and vibration from mechanical equipment would be similar to those of the Project. Mechanical equipment under the Modified Density Alternative would be designed to incorporate appropriate enclosures or placed behind parapets to ensure compliance with Section 112.02 of the LAMC. Therefore, similar to the Project, mechanical equipment noise would be less than significant.

The Modified Design Alternative would include an outdoor terrace on the roof of the Podium structure in the location where Residential Tower 1 would be located under the Project. The outdoor terrace would feature a pool deck, seating areas, and green space that would be periodically used for outdoor events. The nearest noise-sensitive uses from this outdoor terrace are the existing residences along S. Flower Street and future residences along 11th Street (Oceanwide Plaza). These residences would be as close as approximately 120 feet from the nearest edge of the outdoor terrace that could be occupied by guests and event-goers. The sources of noise from the outdoor terrace would include human conversation and other noise associated with pool deck and green space use, and noise from occasional events that could include the use of amplified speakers. The Modified Design Alternative incorporates the following Project Design Feature to minimize potential noise from amplified speakers:

PDF-NOISE-7: Amplified Speaker Noise Limit: Prior to the use of amplified sound equipment on the outdoor terrace located near the intersection of S. Flower Street and 11th Street, the sound levels of amplified sound equipment shall be limited to the following levels as measured by a handheld sound level meter that meets the American National Standards Institute (ANSI) S1.4 standards or equivalent standards:

- For the use of two amplified speakers, each speaker shall be limited to a maximum sound level of 90 dBA as measured 5 feet away from each speaker. Two measurements shall be taken for each speaker: one between the speaker and S. Flower Street and one between the speaker and 11th Street.

- For the use of four amplified speakers, each speaker shall be limited to a maximum sound level of 88 dBA as measured 5 feet away from each speaker. Two measurements shall be taken for each speaker: one between the speaker and S. Flower Street and one between the speaker and 11th Street. The third and

fourth speakers shall be located towards the interior no closer than 100 feet from the edge of the outdoor terrace nearest to S. Flower Street and 11th Street.

- Events and speaker operation on the outdoor terrace shall be limited to daytime and evening use between 8:00 a.m. and 10:00 p.m.

- Logs shall be maintained demonstrating that noise measurements have been taken prior to events with amplified speakers using sound level meters that meet the ANSI S1.4 standards or equivalent standards. The logs shall also document the locations of speakers in an event plan map, photographs, or other appropriate means. The logs shall be maintained on-site for a period of no less than two years from the date of each event and made available to the City upon request.

The ambient daytime noise level near the intersection of S. Flower Street and 11th Street is approximately 65 dBA Leq. Similar to the proposed Project, the Modified Design Alternative would contribute to an increase in ambient noise of approximately 1 dBA from traffic and mechanical equipment noise, based on the composite noise analysis for the Project presented in Section 4.G, *Noise*, of the Draft EIR. With the implementation of PDF-NOISE-7, the use of up to four speakers would generate a maximum noise level of approximately 65 dBA at the nearest sensitive receptors on Flower Street and 11th Street. Under a conservative scenario, assuming a maximum number of occupants on the outdoor terrace, noise from human conversation would be less than 59 dBA at the nearest sensitive receptors on Flower Street and 11th Street.

Similar to the Project, the Modified Design Alternative would include loading and refuse collection areas. Like the Project, the loading areas would be fully enclosed and shielded from surrounding off-site development. Noise from these areas would not increase noise levels at off-site sensitive receptor locations.

Also similar to the Project, the Modified Design Alternative would provide parking for the hotel guests, visitors, commercial, and residential uses in subterranean levels, which would be fully enclosed and contain no unobstructed openings that face toward the nearby noise sensitive uses. Noise from the parking structures would therefore not increase noise levels at off-site sensitive receptor locations.

The composite daytime noise level from these sources, inclusive of ambient noise, would be up to 69 dBA or less at the nearest sensitive receptors on Flower Street and 11th Street, which would not exceed the significance threshold of 70 dBA (see Appendix G). Therefore, the composite noise impacts from the outdoor terrace on the Podium, mechanical equipment, and traffic would be less than significant. However, as this element could increase noise levels at off-site sensitive uses when events are occurring or when amplified speakers are in use, this Alternative would result in greater operational noise impacts than the Project.

As was the case with the Project, noise and vibration impacts from on-site sources during operations would be less than significant. Operation of the Modified Design Alternative would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce some vibration. However, the primary source of transient vibration would include passenger vehicle circulation within the proposed parking area. Ground-borne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 inches per second PPV adjacent to the Project Site.[11] The potential vibration levels from all operational sources at the closest existing and future sensitive receptor locations would be less than the significance threshold of 0.035 inches per second PPV for perceptibility. As such, vibration impacts associated with operation of the

[11] *This vibration estimate is based on data presented in the USDOT Federal Transit Administration, (2006).*

Modified Design Alternative would be below the significance threshold and impacts would be less than significant, similar to the Project.

(8) Population, Housing, and Employment

The Modified Design Alternative would reduce the amount of housing units as well as the amount of commercial development. The number of hotel rooms would remain constant; however, the amount of space for hotel banquet area would be increased, while the hotel conference, and amenity areas would be reduced slightly. These changes would affect the amounts of population, housing and employment that would be generated by the Project. These amounts are shown in **Table 5-8**, *Alternative 4 – Increases in Population, Housing and Employment*. The amounts are compared to those of the Project and the Project's contributions to growth as shown in **Table 5-9**, *Alternative 4 – Comparison of Contributions to Growth*.

Table 5-8

Alternative 4 – Increases in Population, Housing and Employment

Population

Total Housing Units	Average Household Size[a]	Total Population
435	1.63	709

Employees

Use	Amount	Employment Generation Factor[b]	Number of Employees
Retail/Restaurant (sq.ft.)	~~55,499~~ 58,959	0.00271	~~150~~ 160
Residential Amenity Areas	~~13,573~~ 14,688	0.00153	~~21~~ 22
Hotel (sq.ft.)[c]	332,006	0.00113	375
Total New Employees			~~546~~ 557
Existing Employees			(118)
NET INCREASE			**~~428~~ 439**

[a] *The average household size reflects the average household size for the Central City Community Plan Area: 1.63 residents per occupied unit; and reflects Census data for population in households divided by the number of occupied households.*

[b] *The employee generation factor for retail and hotel uses is taken from the Los Angeles Unified School District, 2014 Developer Fee Justification Study, Table 12, March 2014. As a separate rate is not provided for restaurant uses, the retail factor was used. The rate is for Neighborhood Shopping Centers. The rate for the common area is based on the community shopping center rate, which was the closest use type. The existing number of hotel employees is based on information provided by the LUXE Hotel for the existing facility*

[c] *Includes Hotel Rooms, Banquet, Conference, and Amenity Areas.*

Source: ESA PCR Services Corporation, 2017

As indicated in the tables, the Modified Design Alternative would result in the addition of 709 residents, 435 new housing units, and 428 439 net new employees to the Project Site. The population increase would comprise 3.5 percent of the population growth expected in the Central City Community Plan area between 2016 and the Project's buildout year of 2023 (i.e. 20,423 people). The Modified Design Alternative's increases in housing and employment in the Central City Community Plan area during this time frame would.

Table 5-9

Alternative 4 – Comparison of Contributions to Growth

	Population	Housing	Employment
Comparison of Population Totals			
Alternative 4	709	435	~~428~~ 439
Proposed Project	1,060	650	438
Comparison (Alternative – Project)	**-351**	**-215**	**~~-10~~ 1**
Comparison of Contributions to Growth 2016 – 2023 Buildout: Central City Community Plan Area			
Alternative 4	3.5%	3.7%	~~3.5%~~ 3.7%
Proposed Project	5.2%	5.5%	3.6%
Comparison (Alternative 4 – Project)	**-1.7%**	**-1.8%**	**~~-0.1%~~ 0.1%**

Source: ESA PCR 2017

be 3.7 percent of the expected 11,880 new units and 3.5 3.7 percent of the expected 12,335 new jobs, respectively.

The analysis of Project impacts as described in Section 4.H, Population, Housing, and Employment, evaluates the Project's impacts on population, housing, and employment that would be associated both Project construction and Project operations. That analysis concludes that the construction phase would have no impact on the supply of housing units or population growth. Construction workers would be drawn from an existing regional pool of existing workers. The short-term employment opportunities created for construction would contribute to the local and regional economy.

The analysis of impacts due to Project operations evaluates the consistency between the Project's 650 residential units, 1,060 people, and 438 net new employees with growth projections and policies. The analysis concludes that these increases in growth would be consistent with SCAG's short-term and long-term growth projections for the Community Plan area and the City of Los Angeles, which are the basis for planning of services, utilities and infrastructure. The increase in housing would help the City meet or exceed its housing objectives per the General Plan Housing Element, and housing allocation established in the SCAG Regional Housing Needs Assessment (RHNA). The Project would be consistent with the growth provisions of applicable City and SCAG policies, which seek to promote concentrated development within high quality transit areas, reducing vehicle miles traveled and improving the downtown ratio of jobs to housing. Further, the analysis notes that the Project is an infill development that would add no new infrastructure other than that needed to serve the Project Site, and that would not foster otherwise unplanned growth. For these reasons, Project impacts regarding population, housing and employment would be less than significant.

The impacts of the Modified Design Alternative on population and housing during construction would be similar to that of Project. As is the case for the Project, construction workers would be drawn from an existing regional pool of existing workers; and the construction activities would have no impact on the supply of housing units or population growth. The short-term employment opportunities created for

construction would like the Project be slightly reduced from those of the Project, but would contribute to the local and regional economy.

The Modified Design Alternative's contribution to growth in the Central City Community Plan area between 2016 and 2023 are shown in Table 5-9, with a comparison of the differences between the Modified Design Alternative and the Project. As indicated, the variations would be extremely small. The increment of population growth would be 1.7 percent less with the Modified Design Alternative, the number of housing units would be 1.8 percent less and the contribution to employment would be 0.1 percent ~~less~~ greater. As such, the Modified Design Alternative's contributions to growth would also be consistent with SCAG projections.[12]

The reduction in the number of residential units would reduce the Project's contribution to the availability of housing stock; and would be less successful in improving the jobs/housing ratio of the Downtown area. However, the added 435 housing units would continue to comprise a notable contribution to the City's efforts to meet its housing obligation per the RHNA; and the Modified Design Alternative's jobs/housing ratio of ~~0.98~~ 1.01 would be housing rich and would help to bring down the Community Plan ratio of 7.5 to a value closer to the regional ratio of 1.35. Thus, the Modified Design Alternative would also make a substantial contribution to future development of the Downtown area as a more residential area with support for greater use of public transit. The increase in the amount of employment would support job growth, and would further support the vibrancy of the LA LIVE, Staples Center Arena, and LACC complex. By adding fewer units and population growth, the Modified Design Alternative's contribution to SCAG growth projections would be slightly reduced. However, the overall effect of the Modified Design Alternative with a similar mix of uses would be substantially similar to that of the Project. Therefore, the Modified Design Alternative would also be consistent with the growth provisions of applicable City and SCAG policies. Further, and similar to the Project, the Modified Design Alternative is an infill development that would add no new infrastructure other than that needed to serve the Project Site, and would not foster otherwise unplanned growth. Similar to the Project, impacts to Population, Housing, and Employment would be less than significant.

(9) Public Services

i. Fire Protection

Construction of the Modified Design Alternative would include demolition of the existing hotel, excavation and building assembly similar to that of the Project. These activities involve potential exposure to hazardous materials and conditions for site workers, potential exposure to accidents, and the need for site access to and from the adjacent streets.

Upon completion, the operations of the Modified Design Alternative would add new population, employment, and visitor activity at the Project Site, increasing the potential need for fire and/or emergency services. The total floor area of the Modified Design Alternative would be reduced from 1,129,284 square feet to ~~860,121~~ 936,712 square feet, with the elimination of one tower. The remaining development would have a general development configuration similar to that of the Project. The Project's residential population would be

[12] *The analysis also compared the Project contributions to growth within the larger City as well as the Central City Community Plan area and the longer 2040 time horizon of SCAG's RTP/SCS. Project contributions to these larger baseline populations is substantially smaller than for the time and geographic area focused on here. Therefore, variations between the Modified Design Alternative and the Project are less impactful, under those scenarios.*

reduced by 351 residents. There are variations in the square footages for the hotel and its banquet and conference activities, and the overall hotel program increases in area by approximately 52,000 square feet. The commercial area has been reduced by ~~24,501~~ 21,041 square feet. The changes in the hotel and commercial activity would result in an estimated one additional employee. ~~reduction of approximately 10 employees.~~ The Modified Design Alternative would include the same Project Design Features and regulatory provisions as the Project that support public safety and facilitate the provision of services. Regulatory measures include such items as fire safety features (sprinklers emergency procedures), design (including LAFD accessibility), construction, water flow/hydrants, and LAFD plan review pursuant to applicable standards. A Project Design Feature, a Construction Management Program would also be implemented during the construction phase.

The analysis of the potential impact on fire protection and emergency services contained in Section 4.I.1, Fire Protection indicates that the Project would have less than significant impacts during construction and operations. The analysis of construction impacts indicates that the Project's construction impacts would be limited due to (1) Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements to protect workers from hazards and hazardous materials and provide on-site emergency procedures; (2) the Construction Management Program to control impacts on traffic movements on streets adjacent to the Project Site; and (3) accessibility to fire services. Therefore, construction impacts of the Modified Design Alternative would be similar to those of the Project.

The analysis of operations impacts indicates that the Project Site has access to adequate fire services with relatively low response times, adequate distance to nearby fire stations, has sufficient water flow for firefighting service, and as such would not require the addition of new facilities, which would result in a substantial adverse physical impact on the environment, in order to maintain service. Further, the Project would meet regulatory requirements that provide for the public safety and that reduce the demand for firefighting responses.

With a reduced demand for services due to reduced population, reduced commercial space, and reduced building volume, and with the same design features, fire station distance and response times, water flow for firefighting service, and regulatory provisions as the Project, impacts of the Modified Design Alternative on fire and emergency services would be less than those of the Project. The Modified Design Alternative would therefore also not require the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility in order to maintain service. As such, the potential for physical impacts associated with construction of fire service facilities would be less than significant.

ii. Police Protection

Construction of the Modified Design Alternative would include demolition of the existing hotel, excavation and building assembly similar to that of the Project. These activities would involve the storage of equipment, building materials, vehicles, and temporary offices that would be subject to theft or vandalism.

Upon completion, the Modified Design Alternative would add new population, employment and visitor activity at the Project Site increasing the potential need for police and emergency services. The residential population would require an estimated additional 7.6 new officers to maintain the existing service ratio of one officer per 93 persons at the Central Community Police Station, which serves the Project Site.[13] Based on

[13] *709 residents/1 officer per 93 people = 7.6 officers.*

factors in the L.A. CEQA Thresholds Guide, a non-residential population of ~~412~~ 422 persons would result in a potential demand for an additional ~~4.4~~ 4.5 officers.[14] While the site population for the uses would be varied, the general massing of development and the nature of the Site activities would be similar to that proposed for the Project.

The analysis of the potential impact on police services contained in Section 4.I.2, Police Protection, of the Draft EIR addresses impacts due to Project construction and operations. The analysis of impacts during construction concludes that the construction impacts would be less than significant. The Project includes a number of provisions that would reduce the need for LAPD services, including MM-POL-1. These include: limited access to construction areas, private security services, construction fencing with locked/gated entry, and flagging and traffic control as components of a larger construction management program. With these procedures there would be no notable increase in police services serving the Project Site; and therefore no need for the construction of police facilities to accommodate construction population. Therefore, construction impacts of the Modified Design Alternative would be similar to those of the Project.

The analysis of impacts due to Project operations is based on an evaluation of the Project's increased demand for police services and Project security features that would reduce potential impacts. The analysis estimates that the Project would generate a need for 11 new officers based on residential population and a need for an additional 4.5 officers based on non-residential population, if the non-residential population is considered as residential population and the service ratio were to remain constant. At the same time, the Project includes numerous security features that would reduce Project impacts and reduce the need for police services. These include, among other provisions, CCTV, restriction of access to non-public areas by electronically controlled and locking access cards, controlled access to parking structures, and 24-hour on-site security, including four to five private security staff. These security features reduce crime, allow site personnel to address many emergency situations, and facilitate the LAPD in providing services to the site. This reduces the need for additional police services or the provision of new police facilities. As such, the Project would not generate additional demand for police services that would require additional police facilities and impacts on police services would be less than significant.

Compared to the Project, the Modified Design Alternative would reduce the estimated need for additional officers by approximately 3.3 officers ~~: 3.4 fewer officers~~ for the residential development with a similar number of officers for ~~and 0.1 more officers for the increase in~~ non-residential population. The Modified Design Alternative would include similar on-site safety provisions to those described above, including MM-POL-1. to reduce potential impacts and facilitate the provision of services. With the reduced demand for services, and the same on-site security provisions, impacts of the Alternative on police and emergency services would be less than those of the Project. The Modified Design Alternative would therefore also not require the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility in order to maintain adequate service. As such, the potential for physical impacts associated with construction of police service facilities would be less than significant.

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[14] *122 hotel room net increase x 1.5 person/room = 183 persons. 20,681 sq.ft. of banquet and conference facilities x 3 persons/1,000 sq.ft. = 62 persons. ~~55,499~~ 58,959 sq.ft. of retail x 3 persons/1,000 sq.ft. = ~~167~~ 177 persons. The total population of ~~412~~ 422 persons (183+62+~~167~~ 177)/93 officers = ~~4.4~~ 4.5 officers.*

iii. Libraries

The analysis of Project impacts to library services is contained in Section 4.I.3, Libraries of the Draft EIR; and it addresses Project impacts during both Project construction and Project operations. The analysis of construction impacts notes that there are no libraries located in the immediate vicinity that would be affected by construction activities; and use of libraries by construction worker would be limited. Library stops amongst the regional work force may increase library use at one location while reducing it at another. Library effects would be temporal, occurring on a short-term basis. Therefore, increase in demand for library services would be negligible and less than significant.

The analysis of operations impacts indicates that the Project's population of 1,060 new residents would obtain library services primarily from the Richard J. Riordan Central Library, located less than one-mile away, as well as five other libraries in the Project vicinity. Most residents are expected to utilize the Central Library, with Pico Union Branch Library second most likely to be used. The Central Library serves the entire LAPL service area, and does not identify population served or facility size criteria for this facility as it serves not just the downtown area but the entire City as a unique facility with resources that go beyond what is provided through local and regional branch libraries. To the extent that the Pico Union Branch Library might be used, that library has a capacity of 45,000 persons with a current service population of 34,339. If every one of the Project's 1,060 residents chose to patronize this library, it would only comprise approximately 10 percent of the additional resident population that could be accommodated. This is a nominal increase in demand, and this library's existing service level would be maintained without an additional library or alterations to the existing library. Impacts on library services would be less than significant.

The Modified Design Alternative's impact on library services during construction would be similar to that of the Project. In both cases, such use would be minimal and of short-term. Similar to the Project, construction of the Modified Design Alternative would rely on a worker force that would come from an existing labor pool whose workers move between construction projects on short-term basis without requiring relocation. Workers traveling to work may stop at a local library, but such stops would be incidental. Therefore, increase in demand for library services would also be negligible and less than significant. Upon completion of construction, operations of the Modified Design Alternative would generate a new residential population of approximately 709 residents that would use local libraries.[15] During operations, the impacts of Modified Design Alternative would be less than those of the Project due to the reduction of site population by 351 residents. With a reduced residential population and demand for the same library facilities, impact of the Modified Design Alternative would be less than that of the Project. As was the case with the Project, impacts on library services would not require the provision of new library facilities in order to maintain service, the construction of which would lead to significant environmental effects. Impacts would be less than significant.

iv. Parks and Recreation

During the construction phase of the Modified Design Alternative, the construction workforce would come from a regional pool of workers who would travel to the site to perform their work activities and return to their homes at the end of the day. Some workers may visit area parks for lunch or recreational activities; however, such park usage would be limited and would not occur on a long-term basis.

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[15] *As calculated in the discussion of impacts on population and housing above. 435 housing units with an average household size of 1.63 persons per unit each.*

Once development is completed, the operations of the Modified Design Alternative would produce an on-site population of 709 new residents that would generate a need for park and recreation facilities. The Alternative would also provide on-site recreation facilities for its residents, as well as provide recreation facilities for its hotel guests and plaza/public open space for pedestrians/visitors in the area. The on-site recreation facilities, including a fitness center and a pool, have been designed to meet the residents' primary recreational needs in a manner consistent with City regulations for the provision of open space.

The City's applicable open space requirements are defined in Section 12.21.G of the LAMC and modified per provisions of the Downtown Design Guide, and Section 12.22.A.30 that implements the provisions of the Downtown Design Guide. The Downtown Design Guide provisions allow for 50 percent reductions in the total amount of open space otherwise required for a Project under the LAMC, provided that the development's open space provides value to off-site/pedestrian population in the Downtown Area.[16]

The Modified Design Alternative's required amount of open space for meeting the needs of its new residential population is shown in **Table 5-10**, *Alternative 4 – Open Space Requirements*. All of the open space would be required during Phase 2 of the Project, i.e. the phase during which all of the residential development would be constructed. As indicated, the Modified Design Alternative would be required to provide 25,988 sf of total open space area.

Table 5-10

Alternative 4 – Open Space Requirements

Proposed Residential Units	Quantity (units)	Factor (sf/unit)[a]	Open Space Requirement (sf)
Phase II (Residential)			
One Bedroom	210	100	21,000
Two Bedroom	168	125	21,000
Two Bedroom + Den	42	175	7,350
Three Bedroom and Penthouse	15	175	2,625
Subtotal	435	--	51,975 (1.19 acres)
Requirement With 50% Downtown Guide Reduction			**25,988 (0.60 acres)**

Source: ESA PCR, 2017

Facilities for hotel visitors would include a variety of recreation facilities and rooftop gardens. The ground level plazas would provide landscape features and potential public art display as well as seating area that would provide refuge to pedestrians along the sidewalk. The residential facilities would include a mix of

[16] *Such publicly accessible space must: be at ground level; open to the public during daylight hours; have a minimum of 5,000 square feet: be lined with ground floor spaces designed for retail, especially restaurants that include outdoor dining, and/or cultural uses, along at least 20 percent of its frontage; be at least 40 percent landscaped including useable lawn or lawn alternative; and include at least one gathering place with fountain or other focal element.*

common area facilities as well as private balconies. The amounts of public plaza area, residential common area and residential private area are shown in **Table 5-11**, *Alternative 4 – Plaza and Residential Open Space Provisions*, along with a comparison to the respective amounts provided under the Project. As indicated, the Alternative would include a total of 51,200 square feet of open space, inclusive of 8,300 square feet of public plaza area, 19,800 square feet of common open space and 23,100 square feet of private open space.

Table 5-11

Alternative 4 – Plaza and Residential Open Space Provisions

	Public – Street Level Plazas	Common Open Space	Private Open Space	All Open Space
Phase 1	600	0	0	600
Phase 2	7,700	19,800	23,100	50,600
Total Alternative 4	**8,300**	**19,800**	**23,100**	**51,200**
Proposed Project	9,250[a]	45,500	27,000	81,750 (1.62 acres)
Comparison (Alternative – Project)	**2,767**	**-25,700**	**-3,900**	**-30,550**

[a] *The Draft EIR described the Project as having 9,250 square feet of Street Level Plazas and other open space. Of that, 5,000 square feet was plaza area on Figueroa Street. The remaining 4,250 square feet was comprised of residual areas due to the shape of the towers. The Modified Design Alternative is providing 7,700 square feet of useable plaza open space in three plazas compared to the 5,000 square feet for one plaza in the Project. The added plaza areas offer more, higher quality open space that lends itself to more effective landscaping as well as streetscape features.*

Source: ESA PCR, 2017

Not all the Alternative's 51,200 square feet of open space reflected in Table 5-11 qualifies for credit in calculating consistency with the City's open space requirements. The City's regulatory requirements disallow certain types of open space in the calculations even though in many cases the non-credited open space is useable and provides value in reducing potential impacts on the demand for public parks and recreation. For example, City regulatory requirements require open space to have "no horizontal dimension less than 15 feet when measured perpendicular from any point on each of the boundaries of the open space area."[17] Both the plazas located on 11th Street and Olympic Boulevard include areas that are narrower than 15 feet as measured. Furthermore, the City's regulatory requirement allow only 50 square feet per dwelling unit of private open space to be attributable to the total usable open space.[18] The Modified Design Alternative includes private open space that are larger than the 50 square foot maximum and therefore are not included in the "code-recognized" open space calculation. The additional area is still usable, and is included in the "all open space" calculation. The amount of open space provided by the Modified Design Alternative that would be credited per the City's code requirements is shown in **Table 5-12**, *Alternative 4 – Code Recognized Plaza and Residential Open Space Provisions*. As indicated, the Alternative would provide approximately 29,090 square feet, or 0.67 acres of such space. The Alternative would therefore meet the required amount of open space, 25,988 square feet, or 0.60 acres.

[17] *LAMC 12.21 G.2.(a)(1)(iii).*

[18] *LAMC 12.21.G(2)(b)(2)(i).*

Table 5-12

Alternative 4 – Code Recognized Plaza and Residential Open Space Provisions

	Public – Street Level Plazas	Common Open Space	Private Open Space	All Open Space
Phase 1	0	0	0	0
Phase 2	5,000	15,700	8,350	29,050
Total Alternative 4				**29,090 (0.67 acres)**
Required per LAMC				25,988 (0.60 acres)
Difference (Alternative Provision – Requirement)				**3,102 (0.07 acres)**

Source: ESA PCR, 2017

The analysis of Project impacts contained in Section 4.I.4, Parks and Recreation of the Draft EIR, evaluates the Project impacts during construction and operations of the Project. The analysis of construction impacts indicates that there are no parks adjacent to the Project Site would be affected by Project construction and that worker use of parks should it occur would be limited and not on a long-term basis. Also, potential park use would likely occur during the day and would not overlap with peak evening and week-end park usage. The short-term workers would not require new park facilities and impacts on parks would be less than significant.

The analysis of Project impacts on parks and recreation during the operations phase is based on the Project's increase in demand from 650 residential units with an estimated 1,060 residents. That analysis concludes that the Project would provide 1.62 acres of recreation and open space area for Site residents with an additional 0.26 acres of recreation and open space area to serve hotel visitors. Of this amount, 9,250 square feet would be public serving open space in the street level public plaza and other street level locations.

The analysis of the Project's provision of 1.62 acres of recreation and open space concludes that the Project would have less open space than would be required under the Public Recreation Plan's (PRP) long-range standard of four acres per 1,000 persons, i.e. 4.24 acres for the Project's 1,060 residents, and less open space than the PRP's more attainable short- and intermediate-range standard of two acres per 1,000 persons, i.e., 2.12 acres for the Project's 1,060 residents. However, the 1.62 acres of recreation and open space would be sufficient to meet the requirement of 1.61 acres per LAMC Section 12.21.G. The Project would also provide for dedication of land for park uses and/or in-lieu fees to offset the park impacts of new residential development pursuant to LAMC Section 17.12. The Project would meet these requirements through a provision of on-site recreation amenities and payment of fees.

As described in the Draft EIR, the Project's residents would primarily use the Project's recreation facilities; and, residual off-site park usage would likely be dispersed among the 26 existing LADRP parks in the Project vicinity, with only a small increment of use at area public parks. However, the impacts at any single park location would be small and the Project contribution to park use would not cause substantial degradation of existing facilities or require a new public park. Further, the City mitigates potential impacts on park services to less than significant levels through parks and open space requirements and land dedication and/or in-lieu

payment of Quimby fees. As the Project would accommodate recreation and open space demand by its residents on-site; and would meet its obligations for reducing impacts per LAMC regulations, impacts of the Project on parks and Recreation would be less than significant.

The Modified Design Alternative's reduction in the number of units and Site population results in a reduced requirement for on-site recreation and open space facilities. The character of the open space program is similar to that of the Project, incorporating its ground level plaza area for the general public, a large amount of common open space for its tenants and private open space for residents in individual units. As indicated in Table 5-11, the Modified Design Alternative reduces the total amount of open space from approximately 81,750 square feet to 51,200 square feet. As shown in Figure B-1, two new Plaza areas have been added along W. Olympic Boulevard and 11th Street, to complement the Project's primary Plaza on S. Figueroa Street. The tenant's open space areas have been modified from those of the Project in keeping with the reduced number of residents, and reductions in building massing and residential roof-top area. The amount of the Alternative's per capita common open space areas would be decreased from 43 square feet per resident to 28 square feet per resident; however, the private open space per unit would be increased from 26 square feet per resident to 33 square feet per resident.

As was the case with the Project, the Modified Design Alternative would have less open space than needed to meet the PRP long-range and intermediate range standards for the provision of park and recreation space. At the same time, the Modified Design Alternative's 29,090 square feet of open space would meet the LAMC code requirement of 25,988 square feet of open space.

While the Modified Design Alternative's open space has been reduced overall and reconfigured, the modifications to the Project would improve the ground level public plaza provisions, and provide common area recreation and open space areas that, like the Project's, would reduce demand for public park space. As was the case with the Project, after considering similar on-site fitness centers, pool areas, spas, and garden areas, the Modified Design Alternative's off-site park usage would be reduced and dispersed among the numerous parks in the vicinity, with only a small increment of use likely at any single public park. As with the Project, the impacts at any single park location would be small and the Modified Design Alternative's contribution to park use would not cause substantial degradation of existing facilities or require a new public park. Furthermore, like the Project, the Modified Design Alternative would mitigate potential impacts on park services through the payment of Quimby park and recreation fees. Therefore, the impacts of the Modified Design Alternative on park services would be similar to those of Project, and as is the case with the Project, would be less than significant.

(10) Transportation and Circulation

i. Construction

The Modified Design Alternative would add haul trucks, equipment vehicles and worker trips to the local road system during construction. It could also have short-term effects on traffic flow adjacent to the Project Site.

The Project would also have a construction program that would add vehicles to the local road system and potentially affect traffic flows adjacent to the Project Site. The Project would be required to provide a Construction Management Plan (PDF-TRAF-1) to reduce potential construction impacts through scheduling of construction activities, scheduling of construction-related traffic to avoid peak hours, traffic controls, notification, and safety procedures. With the implementation of the Construction Management Plan, the

Project would not result in substantial disruption of traffic flow, intersection operational impacts, conflicts with pedestrians and/or bicyclists, the loss of on-street parking, or conflicts with construction of My Figueroa Project, Los Angeles Streetcar Project, and existing Metro operations. Transportation and parking impacts related to construction would be less than significant. However, due to a large number of cumulative projects in the Project vicinity with a potential for overlapping construction, the Project could contribute to a cumulatively significant construction traffic impact.

The Modified Project Alternative's construction traffic would include some additional trips for excavation activity and reductions in the number of trips that would have been needed for construction of a third tower. The overall number of days of construction would be less during Phase 1 due to the elimination of the third tower, but slightly greater during Phase 2 due to additional floor area added to the Phase 2 residential tower. Some days of construction during the Modified Design Alternative may be subject to more or fewer trips as compared to the Project. However, the maximum number of trips on any one day of maximum construction activity would be similar to that of the Project's construction traffic. As with the Project, nearly all of the trips associated with building construction would occur outside of the peak hours. The Modified Design Alternative would include the same Construction Management Plan, PDF-TRAF-1, as the Project. Therefore, for the reasons concluded for the Project, implementation of PDF-TRAF-1 would ensure that impacts to traffic flow, intersection operations, pedestrians, bicyclists, access, loss of on-street parking, conflicts with My Figueroa and the Los Angeles Streetcar, and transit would be less than significant. As was the case with the Project, due to the large number of cumulative projects in the Project vicinity with a potential for overlapping construction, the Project could contribute to a cumulatively significant construction traffic impact.

ii. Intersection Service Levels

The Modified Design Alternative would provide residential, hotel and commercial uses that would add traffic to the local and regional roadway systems. However, changes in the amount of each of the Site uses would result in trip generation values that vary from those of the Project. The estimated calculation of the Alternative's trip generation with full buildout, before mitigation, is shown in **Table 5-13,** *Alternative 4 - Estimated Trip Generation*, with a comparison to the Project's trip generation.[19]

As indicated, the Alternative would generate a net increase of 4,602 <u>4,859</u> daily trips, which is a reduction of approximately 30 <u>26</u> percent of the Project's daily trips. Commensurate reductions would occur in the A.M. and P.M peak hours, although minor variations in the relative number of in and out trips during the peak hours would vary due to the relative changes in the number of residential trips as compared to the hotel and commercial trips.

The Project's impacts on traffic are analyzed in Section 4.J, Transportation and Traffic of the Draft EIR. The analysis of Project impacts indicates that the Project would produce an increase in traffic over the current Luxe hotel trips by a total of 6,583 daily weekday trips, including 478 a.m. peak hour trips (204 inbound, 274 outbound) and 539 p.m. peak hour trips (312 inbound, 227 outbound). The analysis of Transportation and Traffic concluded that the Project would result in significant impacts at four intersections prior to mitigation when measured against the future (year 2023) baseline conditions. These include the following:

[19] *The analysis for the Alternative is based on the same methodology as that used for the Project in Section 4.J, Transportation and Traffic of the Draft EIR. The analysis of the Alternative is included as Appendix D of the Final EIR: Traffic Impact Analysis of Alternative 4 of the 1020 S Figueroa Street Project, Gibson Transportation Consulting, Inc., 2017. The Appendix study provides greater detail regarding the trip generation rates used, and the reduction credits given for transit/walk-in trips and pass-by-trips.*

Table 5-13

Alternative 4 - Estimated Trip Generation

Use[a]	Amount	Units	Daily Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
Residential	435	du	1,491	23	101	124	81	50	131
Hotel	300	rooms	1,838	70	49	119	69	66	135
	~~55,499~~		~~2,363~~	~~85~~	~~68~~	~~153~~	~~105~~	~~84~~	~~189~~
Commercial	58,959	sf	2,620	98	78	176	119	92	211
			~~5,692~~	~~178~~	~~218~~	~~396~~	~~255~~	~~200~~	~~455~~
Subtotal – New Development			**5,949**	191	228	419	269	208	477
Existing Hotel to be Removed			*1,090*	*41*	*29*	*70*	*41*	*39*	*80*
			~~4,602~~	~~137~~	~~189~~	~~326~~	~~214~~	~~161~~	~~375~~
Total Alternative 4			**4,859**	**150**	**199**	**349**	**228**	**169**	**397**
Proposed Project			6,583	204	274	478	312	227	539
			~~-1,981~~	~~-67~~	~~-85~~	~~-152~~	~~-98~~	~~-66~~	~~-164~~
Comparison (Alternative – Proposed Project)			**1,724**	**-54**	**-75**	**-129**	**-84**	**-58**	**-142**

[a] *Trip Generation factors are based on "Trip Generation," 9th Edition, Institute of Transportation Engineers (ITE), 2012. The land uses categories reflected in the alternatives analyses include ITE 232 for residential; ITE 820 for retail; 932 for restaurant; ITE 310 for Hotel Calculations of trip generation for this Alternative are presented in Appendix D of the Final EIR.*

Source: Gibson Transportation Consulting, Inc. 2017.

12. Figueroa Street & Olympic Boulevard (P.M. peak hour)
13. Figueroa Street & 11th Street (A.M. and P.M. peak hour)
19. Flower Street & 11th Street (P.M. peak hour)
30. Grand Avenue & 17th Street/I-10 Westbound On-Ramp (P.M. peak hour)

The analysis identified feasible mitigation measures to reduce Project impacts including a physical improvement at Intersection 30, Grand Avenue & 17th Street/I-10 Westbound On-Ramp, and a requirement for a Travel Demand Management Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The traffic analysis indicates that with implementation of the Project's mitigation program, the impact at the following three intersections would remain significant and unavoidable:

12. Figueroa Street & Olympic Boulevard (P.M. peak hour)
13. Figueroa Street & 11th Street (A.M. and P.M. peak hour)
19. Flower Street & 11th Street (P.M. peak hour)

An updated analysis of the impacts of the Modified Design Alternative on studied intersections is included in the Appendix A ~~D~~ of ~~the~~ this FEIR Errata. The analysis evaluates both pre-mitigation and post-mitigation scenarios. The post-mitigation scenarios incorporate the same mitigation measures as would be implemented for the Project. The analysis demonstrates that the reduced trip generation would result in reduced impacts at the studied intersections. However, it concludes that the significantly impacted intersections under the Project, both pre-mitigation and post-mitigation, would also be significant for the

Alternative, when measured against the Future Baseline conditions, although the magnitude of the impacts would be reduced.[20]

iii. Regional Transportation System

Trip generation for the Modified Design Alternative and the Project, along with the amount of the Alternative's decrease in trip generation are shown in Table 5-13, above.

The Section 4.J, Transportation and Traffic analysis of the Project in the Draft EIR addresses potential traffic impacts at Congestion Manage Program (CMP) arterial monitoring stations and CMP freeway segments. The analysis regarding CMP arterial monitoring stations indicates that the one, nearest applicable monitoring station would not have an increase of 50 peak hour trips at Phase 1 or Buildout, during existing or future baseline conditions; and therefore would not result in an intersection V/C ratio of 0.02 or greater, the CMP threshold. The analysis regarding CMP freeway segments indicates that the Project would not exceed 150 peak hour trips at the four evaluated freeway segments; and the D/C (demand/capacity) ratio at those segments during Phase 1 and Full Buildout, would not exceed the CMP significance threshold of 0.02 under either existing or future conditions. Therefore, the Project would result in a less than significant impact on the CMP facilities.

The Modified Design Alternative would generate approximately ~~30~~ 26 percent fewer trips than the Project. Therefore, the impacts of the Modified Design Alternative would be less than those of the Project, and like the Project, would be less than significant.

iv. Public Transit

The Modified Design Alternative would generate new demand for public transit service, based upon its new residential, hotel and commercial uses.

The Draft EIR analysis of Project impacts is based on the Project's trip generation without mitigation measures and without trip adjustments for walk-in traffic, internal capture or pass-by traffic. The analysis indicates that the trip generation without these reductions would result in 752 AM and 851 PM peak hour trips at full buildout. The analysis converts these trips to estimated public transit trips by multiplying them by factors for average vehicle occupancy (1.4) and mode split percentage (25%). Accordingly, the Project is estimated to generate 263 new transit trips during the AM peak hour and 298 new transit trips during the peak hour during Buildout conditions.

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[20] *The Traffic Impact Analysis also evaluates the Phase 1 impacts of the Alternative against the Future Baseline conditions and Phase 1 and Build Out analyses for Project impacts against Existing Baseline Conditions. The analysis presented here compares the impacts of the Alternative to those of the Project for the most stringent conditions; i.e. Buildout development against the Future Baseline conditions. Refer to the Traffic Impact Analysis for more detailed discussion. As indicated therein, the Alternative's Phase 1 development would generate 2,376 net new daily trips. This is a reduction of approximately 45 percent from the Project's 4,279 net new daily trips in Phase 1. The reductions in net new daily trips would result in reductions in peak hour trip generation and the level of significance of traffic impacts. When measured against the Future Baseline conditions, the impacts of the Phase 1 traffic with mitigation would result in significant and unavoidable impacts at one intersection (Figueroa Street and 11th Street), in contrast to the three intersections of the Project's Phase 1 traffic. Neither the Project nor the Alternative would result in significant unavoidable impacts when measured against the Existing Baseline Conditions; although the impacts of the Alternative would be proportionately less than those of the Project.*

The analysis concludes that the transit ridership generated by the Project would not exceed the residual capacity of the Project area's transit lines, and therefore impacts with respect to regional transit capacity would be less than significant. The analysis also indicates that the Project would not conflict with adopted policies, plans, or programs supporting alternative transportation, since development would be concentrated in the Downtown Center near public transit, would provide pedestrian and bicycle amenities, and would implement a Transportation Demand Management Program as Mitigation Measure MM-TRAF-1. Therefore, impacts in this regard would be also be less than significant.

The calculation of trip generation in Table 5, of the Alternative's Traffic Study, presents the net trip generation that is shown for the Modified Design Alternative in Table 5-13, above, resulting in ~~326~~ 349 AM and ~~375~~ 397 PM peak hour trips. Removing the trip reductions and existing use credits (also reported in Table 5), results in an estimated ~~504~~ 542 AM peak hour and ~~585~~ 622 PM peak hour trips for the purposes of calculating public transit trips.[21] ~~Applying the~~ Multiplying the 542 AM peak hour trips and 622 PM peak hour trips by the 1.4 vehicle occupancy and 0.25 mode split factors results in a total estimate of ~~176~~ 190 AM peak hour and ~~205~~ 218 PM peak hour public transit trips for the Modified Design Alternative. These are reductions of approximately ~~33~~ 28 percent and ~~31~~ 27 percent respectively. ~~, which therefore~~ Therefore, the transit trips for the Modified Design Alternative would also not exceed the residual capacity of the Project area's transit lines. The Modified Design Alternative would include the same features as the Project that would support the adopted policies, plans, or programs supporting alternative transportation. Therefore, the impacts of the would be less than those of the Project, and like the Project would be less than significant.

v. Access and Circulation

Access for the Modified Design Alternative would be provided from 11th Street, Flower Street, and Olympic Boulevard. An egress/ingress driveway into the subterranean parking structure would be provided along Olympic Boulevard for residences and service vehicles. An egress/ingress driveway along Flower Street would provide hotel and commercial access. The primary hotel access would be from a hotel dedicated driveway into the hotel porte cochere entryway from 11th Street. The porte cochere would be linked internally within the Project Site to the subterranean structure, loading and valet areas.

The Draft EIR analysis of the Project's access addresses a site plan with access from 11th Street, Flower Street, and Olympic Boulevard. A private residential access is provided via a driveway along 11th Street. A driveway along Flower Street would provide entrance for commercial visitors and service vehicles. Commercial and private residential access would also be provided from two driveways (for ingress and egress) along Olympic Boulevard. For hotel visitors, a separate hotel-only motor-court drop off area would be provided off of 11th Street, with one driveway for ingress and one for egress. A separate valet gate within the property at the interior of the motor-court area would provide access for valets to park hotel guest vehicles within the subterranean parking levels. Loading for service vehicles related to hotel, residential, and commercial uses and trash collection would be on the ground level, interior to the Project Site within the Podium and accessed from Flower Street.

The Draft EIR analysis identifies Project characteristics that would facilitate site access. The loading area would be designed to meet the requirements of the LAMC. All access points would be designed based on

[21] *Per Table 5, for the AM peak hour: the sum of all the reductions and credits listed (31+ 40 +6+3+3+55+36+40-24) =193 plus the 349 net trips = 542 gross trips. For the PM peak hour: the sum of the reductions and credits listed (32+45+23+14+16+53+32+37-27) = 225 plus the 397 net trips = 622 gross trips.*

LADOT standards. Therefore, the Project would provide circulation to accommodate vehicular traffic without substantially impeding through traffic movements on City streets. Further, the existing network of traffic lanes, public sidewalks and pedestrian crosswalks would be maintained and sidewalks fronting the Project Site, along Figueroa Street, 11th Street, Flower Street, and Olympic Boulevard, would be widened. In addition, the Project would provide separated access for pedestrian and vehicular traffic and no safety or operational impact relative to bicycle traffic is anticipated. Therefore, impacts with respect to vehicular, pedestrian, and bicycle access would be less than significant.

Site access for the Modified Design Alternative is substantially similar to that of the Project with access from the same streets, similar sidewalk movements, and similar vehicle movements within the Site. The one variation is that the Project's residential and hotel driveways on 11th Street would no longer include residential entry, leaving the driveway dedicated to hotel uses. The residential uses would be relocated to Olympic Boulevard. The Modified Design Alternative would be subject to the same design standards and regulations with regard to access as would the Project. Therefore, impacts of the Modified Design Alternative would be similar to those of the Project and like the Project would be less than significant.

vi. Vehicle and Bicycle Parking

An updated analysis of the impacts of the Modified Design Alternative on studied intersections is included in the Appendix A ~~D~~ of ~~the~~ this FEIR Errata. ~~The Appendix E Traffic Analysis~~ This analysis ~~also~~ includes an evaluation of the estimated number of automobile and bicycle parking spaces that would be required for the Alternative by City Codes. As indicated, the total number of automobile parking spaces estimated to be required at Buildout of the Alternative is ~~738~~ 741 spaces. This is ~~61~~ 58 fewer parking spaces the 799 required parking spaces estimated for the Project. The Alternative would require an estimated ~~634~~ 658 bicycle spaces in contrast to the Project's 894. The Alternative would, like the Project, provide at least the number of bicycle and vehicle parking spaces that meets the requirements of the Code, subject to final design review of the approved Project. The reduction in the number of parking spaces is commensurate to the reduction in the development program. Impacts of the Alternative on vehicular and bicycle parking would be similar to those of the Project, and like those of the Project would be less than significant.

(11) Utilities and Service Systems

i. Water Supply

The Modified Design Alternative would include new residential, hotel, commercial and related amenity uses that would generate a demand for the consumption of water resources. The Modified Design Alternative has less development than the Project, with a varied mix of uses. The reduction in the number of residential units would reduce water consumption, although this decrease would be partially off-set with an increase in the average number of bedrooms per unit. Water consumption for the residential commons area would be increased slightly, while the water consumption for the hotel ancillary uses and commercial uses would be reduced relative to the Project. Water consumption for the hotel rooms would remain the same. The base demand of the Modified Design Alternative for water consumption is estimated in **Table 5-14**, *Alternative 4 - Estimated Base Demand Water Consumption*. As indicated, the base demand is ~~259,777~~ 264,797gpd.[22]

[22] *The base water demand calculation is based on the same factors as uses in the WSA. These are primarily from the Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table. The sewer generation rates take into account some regulatory required conservation features.*

Table 5-14

Alternative 4 – Estimated Base Demand Water Consumption

Land Use	Quantity (units/sf/ seats/room)	Water Consumption Factor[a]		Base Demand (gpd)
Residential				
One Bedroom	210	110	gpd/unit	23,100
Two Bedroom	168	150	gdp/unit	25,200
Two Bedroom + Den	42	190	gpd/unit	7,980
Three Bedroom	12	190	gpd/unit	2,280
Penthouse/Four Bedroom	3	230	gpd/unit	690
Residential Common				
Lounge	11,400	0.05	gpd/sf	570
Fitness Room	10,000	0.65	gpd/sf	6,500
Hotel				
Rooms	300	120	gpd/room	36,000
Hotel Restaurant (seats)	77	30	gpd/seat	2,310
Hotel Bar (seats)	181	15	gpd/seat	2,715
Banquet	15,080	0.35	gpd/sf	5,278
Conference	20,000	0.12	gpd/sf	2,400
Fitness Center/Spa	6,990	0.65	gpd	4,544
Hotel public area (including lobby)	8,909	0.05	gpd/sf	445
Commercial				
Retail	~~32,115~~ 31,721	0.05	gpd/ sf	~~1,606~~ 1,586
Restaurant (Full Service Indoor Seat)	~~1,017~~ 1,185	30	gpd/seat	~~30,510~~ 35,550
Open Space				
Plazas/lounge/terrace	17,500	0.05	gpd/ sf	875
Structured Parking/Subterranean Parking	383,998	0.02	gpd/sf[c]	252
Landscaping (sf)		[b]		1,384
Cooling Tower (tons)		[b]		105,138
Alternative 4 -- Total Base Demand				~~259,777~~ 264,797
Project Base Demand				282,099
Comparison of Base Demand (Alternative - Project)				~~-22,322~~ - 17,302

[a] *The base water demand calculation is based on the same factors as used in the WSA. These are primarily from the Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table. The sewer generation rates take into account some regulatory required conservation features.*

[b] *It has been conservatively assumed that the water consumption for the cooling tower and for the landscaping would be similar to that of the Project, although the landscaped area has been reduced slightly and the cooling tower requirements would be reduced with one less Residential Tower.*

[c] *The generation factor, 0.02 gpd/sf, reflects a daily value for hosing down garage areas. However, it is assumed that such water usage would occur only one day per month. Therefore, the calculation of water consumption multiplies the square feet of parking by the water consumption factor and then by a percentage of days of occurrence that is equal to 12 months divided by 365 days.*

Source: ESA PCR, 2017

The analysis of Project impacts on water consumption contained in Section 4.K-1, Water Supply, of the Draft EIR, is based on the Water Supply Assessment (WSA) that was prepared by the Los Angeles Department of Water and Power (LADWP). That analysis provides a calculation of base demand, and then takes reductions for water consumption by the existing hotel uses and for additional water conservation features required by ordinance and conservation features volunteered by the Project applicant. That analysis indicates that the Project would have a base demand of 282,099 gpd. This estimate has then been reduced by the 19,287 gpd that are associated with the existing hotel uses for a total of 262,812 gpd. After netting out the savings for the use of water conservation features, the WSA identifies a net demand of 219,525 gpd or 245.92 afy.

As also indicated in Table 5-14, the Modified Design Alternative's base demand of ~~259,777~~ 264,797 gpd is approximately ~~22,322~~ 17,302 gpd less than the Project's, or a reduction of approximately ~~8~~ 6 percent. The Alternative would have the same reduction for existing uses and somewhat similar reductions for water conservation features that are required under City regulations and that are included in PDF-WS-1.[23] Therefore, it may be roughly estimated that the net water consumption would be similarly reduced, by about ~~8~~ 6 percent, or approximately ~~19.5~~ 14.76 afy; resulting in a water consumption amount of ~~226.4~~ 231.16 afy.

The WSA for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. The Project includes numerous design features to reduce the demand for water consumption. Water infrastructure and water supply is sufficient to meet the demands of the Project without Project mitigation and the Project impact on the provision of water services would be less than significant.

As with the Project, the Modified Design Alternative would require provision of the necessary building water system on the Project Site and extension to connect the Project Site to existing water lines in the area, pursuant to LADWP rules and review. Impacts on existing water infrastructure would therefore be less than significant, similar to the Project. The Modified Design Alternative would include the same regulatory PDF-WS-1 conservation features to reduce the demand for water consumption as the Project. As the Alternative would include similar water conservation features to those of the Project and would generate less demand for water consumption than the Project, impacts of the Alternative would be less than the Project. As was the case with the Project, impacts would be less than significant.

ii. Wastewater

The Modified Design Alternative would include new residential, hotel, commercial, and related amenity uses that would generate wastewater requiring conveyance from the Project Site and treatment. The Modified Design Alternative has less development than the Project, with a varied mix of uses. There would be some reduction in wastewater generation with fewer residential units, however the Alternative has larger unit sizes overall, increasing the amount of wastewater generation per unit. The Alternative has an increase in banquet facilities as compared to the Project, but also has a decrease in the amount of commercial space. The wastewater generation for the Alternative's development mix is estimated in **Table 5-15**, *Alternative 4 – Estimated Wastewater Generation*. As indicated, the Modified Design Alternative would generate a net increase of ~~184,807~~ 186,087 gpd of wastewater.

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[23] *The analysis of the Alternative has conservatively assumed that the cooling tower for the Alternative would be the same size as that for the Project, even though the Alternative has one tower and 269,163 square feet less of development that would require cooling. Assuming that the water conservation for the tower would be similar (19,470 gpd if similarly sized) and the existing uses to be removed are the same(19,287 gpd) the reductions from the based demand of 38,757 gpd would amount to 62 percent of the reduction of 62,574 from the base demand. In other word the Alternative would have the same reductions for the two largest factors and the reductions for remaining use would be expected to be somewhat similar across the board.*

Table 5-15

Alternative 4 – Estimated Wastewater Generation

Land Use	Quantity (units/sf/ seats/room)[a]	Wastewater Generation Factor[b]		Wastewater (gpd)
Residential				
One Bedroom	210	110	gpd/unit	23,100
Two Bedroom	168	150	gdp/unit	25,200
Two Bedroom + Den	42	190	gpd/unit	7,980
Three Bedroom	12	190	gpd/unit	2,280
Penthouse/Four Bedroom	3	230	gpd/unit	690
	~~32,115~~			~~803~~
Retail	31,721	25	gpd/1,000 sf	793
	~~263~~			~~7,890~~
Restaurant (Full Service Indoor Seat)	306	30	gpd/seat	9180
Hotel (Guest Rooms Only)	300	120	gpd/room	36,000
Banquet Room/Ballroom	20,681	350	gpd/1,000 sf	7,238
Swimming Pools[c]	91,413	1	gpd	91,413
Industrial Discharge[d]	1,500	a	gpd	1,500
Less Existing Wastewater Generation				-19,287
				~~184,807~~
Total – Alternative 4				**186,087**
Project				198,287
				~~-13,480~~
Comparison (Alternative 4 – Project)				**-12,200**

[a] *The quantities used correspond the amount of each use as reflected in Table 5-7, above. The number of restaurant seats as a function of the number of square feet is determined proportionately, based on the conversion in the City's SCAR reports. It has been conservatively assumed that the swimming pool and industrial discharge amounts would be similar to those of the Project, although the Alternative has been reduced in size from that of the Project. Industrial discharge value is listed as a total in the SCAR report.*

[b] *Wastewater generation rates are those used by the Los Angeles Bureau of Engineering as part of the preparation of their Sewer Capacity Availability Review (SCAR) reports.*

Source: ESA PCR, 2017

The Project's impacts on wastewater conveyance and treatment in Section 4.K.2 Wastewater, of the Draft EIR estimates the Project's demand for wastewater conveyance and treatment to represent a net increase of approximately 198,247 gpd more than the 19,298 gpd generated by the existing hotel generation of wastewater.[24] The analysis is based, in part, on the SCAR reports prepared by the Los Angeles Bureau of Engineering. The Project analysis concludes that the Hyperion Treatment Plant would have sufficient capacity to treat the Project's wastewater, and there would be sufficient local infrastructure in place to

[24] *The estimate in Section 4.K.2 includes a gross calculation of 217,534 gpd with a credit of 19,287 gpd for existing uses, resulting in a net amount of 198,247 gpd. In their comment on the Draft EIR, the Bureau of Engineering included a new calculation that varied slightly from the value reflected in their SCAR reports: 218,519. Refer to Comment and Response 6-2, of Section 2.0 Comments and Responses of the Final EIR. The variation is minor and does not alter the conclusions of the Draft EIR.*

provide the necessary conveyance of the wastewater. The Project would not result in a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Therefore, the Draft EIR analysis of Project impacts on HTP capacity, as supported by the SCAR reports, concludes that Project impacts would be less than significant.

The Modified Design Alternative would reduce the amount of wastewater discharge by approximately ~~13,480~~ 12,200 gpd, or approximately ~~7~~ 6 percent. Therefore, flow impacts within the local sewer lines and demand for treatment at the HTP would be reduced. Impacts of the Modified Design Alternative would be less than those of the Project, and like the Project would be less than significant.

(C) RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Modified Design Alternative has incorporated a number of features to enhance the appearance of the Project and its relationship to nearby development. Therefore, the Alternative would more effectively accomplish the following Project objectives than would the Project itself:

- Objective 3: Respect and maintain the historical significance of the Petroleum Building by providing a setback along W. Olympic Boulevard to maintain views of the Petroleum Building's architecturally distinguished primary facades along W. Olympic Boulevard and S. Flower Street.
- Objective 4: Compliment and foster pedestrian activity through ground level retail/restaurant uses, street trees and landscaping, public art, and signage and lighting compatible with the active LASED and streetscape along W. Olympic Boulevard, S. Figueroa Street, S. Flower Street, and 11th Street.
- Objective 5: Create a visually vibrant and engaging pedestrian and vehicular experience along Figueroa Street, removing paved surface parking, and providing new pedestrian scale features such as a public plaza, that are compatible with the adjacent entertainment and restaurant venues at LA Live and Staples Center Arena directly across the street.
- Objective 6: Create a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design and appropriate scale of development.
- Objective 7: Provide unique and vibrant signage that is integrated into the Project's architecture and that will visually connect to and be compatible with the scale of media and signage on existing and current development on adjacent blocks while informing and attracting visitors to the Project's content and offerings.

While still consistent with the objectives, reducing the number of residential units, maintaining the same number of hotel rooms, and reducing the amount of commercial space, the reductions in these uses reduces the effectiveness of the Alternative in meeting the following objectives as compared to the Project:

- Objective 1: Support the diverse array of entertainment, shopping, nightlife, cultural, and residential uses in Downtown by locating new residences within the Downtown Housing Incentive Area, new hotel rooms to support the goals laid out in the Mayor's 2015 White Paper on the Future of the Los Angeles Convention Center, and neighborhood and visitor serving uses to support connectivity with LA LIVE, Staples Center Arena, and the Los Angeles Convention Center.

- Objective 10: Maintain and enhance the economic vitality of the region by providing job opportunities that attract commercial and residential tenants, and increase the tax revenue, sales, and property taxes.

While the Alternative varies from the Project in its use mix and design, it would be substantially similar to the Project in meeting the following objectives:

- Objective 2: Develop a mixed-use project that combines housing, hotel, and commercial uses in close proximity to public transit consistent with regional mobility goals to reduce vehicle trips and infrastructure costs, while supporting the use of public transportation and amenities, including the nearby Metro Stations, City bus and DASH lines.
- Objective 8: Create a development with high quality design that is responsive environmental sustainability issues (e.g. energy efficiency, including electronic charging stations for Project tenants); and that provides open space and recreational amenities for Project's residents, hotel guests, commercial tenants, and site visitors.
- Objective 9: Redevelop an underutilized site with an economically viable and attractively designed development that supports the SCAG growth projections in Downtown by exercising TFAR provisions for fuller utilization of the Project Site and support of TFAR public benefits purposes.

TR-1: ALTERNATIVE 4, THE MODIFIED DESIGN ALTERNATIVE

Page 2-8 of the Final EIR.

Revise the second paragraph to read as follows:

The Modified Design Alternative, as compared to the Project, would eliminate one of two residential towers, create two additional public plaza areas, reduce overall development floor area by nearly ~~24~~ approximately 17 percent, reduce residential units by approximately 33 percent, reduce commercial uses by approximately ~~31~~ 26 percent, and reduce digital display signage by approximately 63 percent. The heights of the remaining residential tower and the Hotel Tower would remain as proposed under the Project, and there would be no change in the number of hotel rooms.

Revise the fourth paragraph to read as follows:

With the Modified Design Alternative, the total amount of development would be reduced from the Project's 1,129,284 square feet to ~~860,121~~ 936,712 square feet, resulting in a development FAR of ~~7.4:1~~ 8.03:1in contrast to the Project's 9.7:1. The total number of residential units has been reduced from 650 units to 435 units (a decrease of 215 units). The number of hotel rooms has remained the same at 300 rooms; however ancillary hotel uses have been increased from 32,665 square feet to 36,580 square feet (an increase of 3,915 square feet). The amount of retail/restaurant space is reduced from 80,000 square feet to ~~55,499~~ 58,959 square feet (a decrease of ~~24,501~~ 21,041 square feet).

From: Wes Pringle <wes.pringle@lacity.org>
Sent: Monday, July 17, 2017 4:32 PM
To: Blake Lamb
Cc: Emily Wong; link linc
Subject: Refined Traffic Impact Analysis for Alternative 4 - Luxe Hotel Project

Blake,

DOT has reviewed the latest revised analysis for the Luxe Hotel Project located at 1020 S. Figueroa Street. On July 12, 2017, Gibson Transportation Consulting submitted a revised analysis of the project. Previously, DOT issued on a letter on April 27, 2017, reviewing the supplemental analysis that was issued in October 2016. The revised project description remains virtually the same with a slight increase in the size of the commercial uses. The increase in commercial space results in a slight increase in the trip generation, but it remains below the originally approved project.

DOT concurs with the revised analysis that the modifications to the project will not change the findings of DOT's April 27, 2017 and June 14, 2016 letters.

Please let me know if you have any questions.

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Wes Pringle. P.E.
Transportation Engineer
Metro Development Review100 S. Main Street,
9th FloorLos Angeles, CA 90012Cell Phone:
213-718-0713

Los Angeles Department of Transportation
213.972.8482

MEMORANDUM

TO: Jay Ziff, ESA PCR
Jessie Barkley, ESA PCR

CC: Sheri Bonstelle, Jeffer Mangels Butler & Mitchell LLP

FROM: Sarah M. Drobis, P.E., and Emily Wong, P.E.

DATE: July 12, 2017

RE: Refined Traffic Impact Analysis for Alternative 4
of the 1020 S. Figueroa Street Project
Los Angeles, California **Ref:** J1312

Gibson Transportation Consulting, Inc. (GTC) reviewed the refined development program and site plan for Alterative 4 for 1020 S. Figueroa Street as part of the Errata to the Final Environmental Impact Report (EIR). Alternative 4 was previously analyzed in *Traffic Impact Analysis for Alternative 4 of the 1020 S. Figueroa Street Project* (GTC, March 2017), which was reviewed and approved by the Los Angeles Department of Transportation (LADOT) in April 2017. GTC compared the latest plans for Alternative 4 with the project defined in the October 2016 Draft EIR (the Project). The results presented in this memorandum are consistent with the conclusions of the March 2017 memorandum.

Alternative 4 includes a reduced development program and would generate fewer trips than the Project. In total, full buildout of Alternative 4 (Full Buildout) includes 435 condominium units, a 300-room hotel, and approximately 59,000 square feet (sf) of commercial (retail and restaurant) uses. Similar to the Project, Alternative 4 would be constructed in phases, with the first stage (Phase 1) including the construction of the hotel tower and approximately 13,841 sf commercial uses. The second stage of construction (Phase 2) would include the residential tower and the remaining commercial uses. Consistent with the Project, the existing 178-room Luxe Hotel would be removed with construction of Phase 2.

Alternative 4 concentrates all residential access at one driveway along Olympic Boulevard, with all hotel and commercial access (Phase 1 and Phase 2) provided via a porte-cochère along 11th Street and a driveway along Flower Street.

PHASE 1

As shown in Table 1, with application of appropriate trip reductions consistent with the Project, Phase 1 of Alternative 4 would generate a net total of 2,376 daily weekday trips, including 151 AM peak hour trips (88 inbound, 63 outbound) and 179 PM peak hour trips (93 inbound, 86 outbound).

As detailed in Table 2, after accounting for the 10% trip reduction with implementation of the transportation demand management (TDM) Program, Phase 1 of Alternative 4 would generate 2,138 daily weekday trips, including 136 AM peak hour trips (79 inbound, 57 outbound) and 160 PM peak hour trips (83 inbound, 77 outbound).

Prior to mitigation, Phase 1 of Alternative 4 would not result in a significant impact at any of the analyzed study intersections under Existing with Alternative 4 – Phase 1 Conditions, as detailed in Table 3.

As shown in Table 4, prior to mitigation, Phase 1 of Alternative 4 would result in a significant impact at the following three intersections under Future with Alternative 4 – Phase 1 Conditions:

13. Figueroa Street & 11th Street (PM peak hour)
19. Flower Street & 11th Street (PM peak hour)
30. Grand Avenue & 17th Street/I-10 Westbound On-Ramp (PM peak hour)

Therefore, Phase 1 of Alternative 4 would result in one less significant impact under Future Conditions than Phase 1 of the Project.

As shown in Table 4, with implementation of the Project's mitigation program, which includes a TDM program and a physical improvement at the intersection of Grand Avenue & 17th Street/I-10 Westbound Off-Ramp (Intersection #30), the impact at the intersection of Figueroa Street & 11th Street (Intersection #13) would remain significant and unavoidable. Therefore, Phase 1 of Alternative 4 would result in two fewer significant and unavoidable impacts than Phase 1 of the Project.

FULL BUILDOUT

After accounting for the removal of the existing Luxe Hotel and applying appropriate trip reductions, consistent with the Project, Full Buildout of Alternative 4 is estimated to generate a net total of 4,859 daily weekday trips, including 349 AM peak hour trips (150 inbound, 199 outbound) and 397 PM peak hour trips (228 inbound, 169 outbound), as shown in Table 5.

As detailed in Table 6, after accounting for the 10% trip reduction with implementation of the TDM Program, Full Buildout of Alternative 4 would generate 4,264 daily weekday trips, including 307 AM peak hour trips (131 inbound, 176 outbound) and 349 PM peak hour trips (201 inbound, 148 outbound).

As shown in Table 7, prior to mitigation, Full Buildout of Alternative 4 would not result in a significant impact at any of the study intersections under Existing with Alternative 4 – Full Buildout Conditions.

As shown in Table 8, prior to mitigation, Full Buildout of Alternative 4 would result in a significant impact at the following four study intersections under Future with Alternative 4 – Full Buildout (Year 2023) Conditions:

12. Figueroa Street & Olympic Boulevard (PM peak hour)
13. Figueroa Street & 11th Street (AM and PM peak hour)

19. Flower Street & 11th Street (PM peak hour)
30. Grand Avenue & 17th Street/I-10 Westbound On-Ramp (PM peak hour)

Thus, Alternative 4 would result in the same significantly impacted intersections as compared to the Project, though at reduced levels of significance.
With implementation of the Project's mitigation program, as described above, the impact at the following three intersections would remain significant and unavoidable under Future with Alternative 4 with Mitigation – Full Buildout (Year 2023) Conditions, similar to the Project:

12. Figueroa Street & Olympic Boulevard (PM peak hour)
13. Figueroa Street & 11th Street (AM and PM peak hour)
19. Flower Street & 11th Street (PM peak hour)

Thus, Full Buildout of Alternative 4 would not result in any new or substantially increased significant traffic impacts beyond those identified for the Project.

PARKING

Alternative 4 proposes to provide parking for all hotel and commercial uses within Phase 1 of development, while all residential parking would be provided within Phase 2 of development. The code parking requirements for Alternative 4 were determined based on the identified off-street automobile and bicycle parking requirements of various land uses in the Los Angeles Municipal Code (City of Los Angeles, December 30, 2016) (LAMC).

Code-Required Automobile Parking

The following automobile parking rates are indicated in Section 12.21.A4 of the LAMC for uses within the Downtown Parking District and Central City Parking District:

- Residential Uses
  - Less than three habitable rooms
    - One space per dwelling unit
  - Three or more habitable rooms
    - 1.25 spaces per dwelling unit

- Commercial Uses
  - One space per 1,000 sf

- Hotel Uses
  - First 20 Guestrooms
    - One space per room
  - Next 20 Guestrooms
    - One space per four rooms
  - Remaining Guestrooms
    - One space per six rooms

- Banquet/Conference Space
  - One space per 100 sf

Per LAMC Section 12.21A.4, projects within 1,500 feet of a fixed rail transit or bus station may replace up to 15% of the required residential automobile parking spaces and 30% of the required commercial automobile parking spaces with bicycle parking spaces. These parking rates and reductions were applied to the proposed floor area of the Project to determine the required amount of off-street automobile parking stalls.

As detailed in Table 9, Alternative 4 is required to provide a total of 741 parking spaces at Full Buildout, which would be satisfied within the on-site automobile parking supply. Phase 1 is required to provide 279 automobile parking spaces, including 14 commercial spaces and 265 hotel guest and banquet/conference spaces. Bicycle parking reductions would not be taken for Phase 1. Phase 2 is required to provide 536 automobile parking spaces, including 491 residential spaces and 45 commercial spaces. The Project is located within 1,500 feet of the Metro Pico Station, thereby allowing 74 LAMC-required residential automobile parking spaces to be replaced with bicycle parking spaces. Therefore, the net off-street automobile parking requirement for Phase 2 is 462 spaces.

Code-Required Bicycle Parking

Bicycle parking requirements are subdivided into short-term and long-term parking based on LAMC Section 12.21.A.16(a)(2). Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points; long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public.

LAMC Section 12.21A16(a) identifies bicycle parking rates that were used to determine the required bicycle parking spaces for the Project. The following short-term and long-term bicycle parking rates are indicated in the LAMC:

- Residential
  - Short-term: One space per 10 dwelling units
  - Long-term: One space per dwelling unit

- Hotel
  - Guest Rooms
    - Short-term: One space per 20 guestrooms
    - Long-term: One space per 20 guestrooms
  - Banquet/Conference Space
    - Short-term: One space per 350 sf
    - Long-term: One space per 700 sf

- Commercial
  - Short-term: One space per 2,000 sf
  - Long-term: One space per 2,000 sf

As detailed in Table 10, Alternative 4 is required to provide a total of 658 parking spaces at Full Buildout, which would be satisfied within the on-site bicycle supply. Phase 1 is required to provide 133 bicycle parking spaces, including 81 short-term spaces and 52 long-term spaces. Phase 2 is required to provide 525 bicycle parking spaces, including 67 short-term spaces and 458 long-term spaces.

TABLE 1
TRIP GENERATION ESTIMATES - ALTERNATIVE 4 - PHASE 1

TRIP GENERATION RATES[a]									
Land Use	ITE Land Use	Rate	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
High-Rise Condominium	232	per dwelling unit	[b]	19%	81%	[b]	62%	38%	[b]
Hotel	310	per room	8.17	59%	41%	0.53	51%	49%	0.60
Shopping Center	820	per ksf	42.70	62%	38%	0.96	48%	52%	3.71
High-Turnover Restaurant	932	per ksf	127.15	55%	45%	10.81	60%	40%	9.85

TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project									
Hotel	310	300 rooms	2,451	94	65	159	92	88	180
Transit/Walk-In Reduction - 25% [c]			*(613)*	*(24)*	*(16)*	*(40)*	*(23)*	*(22)*	*(45)*
Hotel Subtotal			***1,838***	***70***	***49***	***119***	***69***	***66***	***135***
Retail	820	9.147 ksf	391	6	3	9	16	18	34
Internal Capture Reduction - 20% [d]			*(78)*	*(1)*	*(1)*	*(2)*	*(3)*	*(4)*	*(7)*
Transit/Walk-In Reduction - 15% [c]			*(47)*	*(1)*	*0*	*(1)*	*(2)*	*(2)*	*(4)*
Pass-by Reduction - 20% [e]			*(53)*	*(1)*	*0*	*(1)*	*(2)*	*(2)*	*(4)*
Restaurant	932	4.694 ksf	597	28	23	51	28	18	46
Internal Capture Reduction - 20% [d]			*(119)*	*(6)*	*(5)*	*(11)*	*(6)*	*(4)*	*(10)*
Transit/Walk-In Reduction - 15% [c]			*(72)*	*(3)*	*(3)*	*(6)*	*(3)*	*(2)*	*(5)*
Pass-by Reduction - 20% [e]			*(81)*	*(4)*	*(3)*	*(7)*	*(4)*	*(2)*	*(6)*
Commercial Subtotal			**538**	**18**	**14**	**32**	**24**	**20**	**44**
TOTAL - ALTERNATIVE 4 PHASE I TRIPS			**2,376**	**88**	**63**	**151**	**93**	**86**	**179**
TOTAL - DEIR PHASE I PROJECT TRIPS			**4,279**	**140**	**164**	**304**	**189**	**148**	**337**
DIFFERENCE (ALTERNATIVE 4 - DEIR)			**(1,903)**	**(52)**	**(101)**	**(153)**	**(96)**	**(62)**	**(158)**

Notes:
[1] Dwelling Unit = DU.
[2] 1,000 square feet = ksf.
[a] Source: *Trip Generation, 9th Edition*, Institute of Transportation Engineers, 2012.
[b] Trip generation rate based on the best-fit curve formula listed in the ITE for the High-Rise Condominium land use.

Daily - T = 3.77 (X) + 223.66 T = Average Vehicle Trips X = Gross Leasable Area (ksf)
A.M. Peak Hour - T = 0.29 (X) + 28.86
P.M. Peak Hour - T = 0.34 (X) + 15.47

[c] Per LADOT's *Traffic Study Policies and Procedures,* the Project Site is located within a 1/4 mile walking distance from a transit station or RapidBus stop, therefore a transit reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments, and for arrivals via taxi, tour bus, and carpool services.
[d] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (e.g., residents and hotel guests visiting the retail/restaurant uses)
[e] Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

TABLE 2
TRIP GENERATION ESTIMATES - ALTERNATIVE 4 - PHASE 1
WITH TDM PROGRAM

Land Use	ITE Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Alternative Trip Generation [a]									
Hotel	310	300 rooms	2,451	94	65	159	92	88	180
Transit/Walk-In Reduction - 25% [c]			*(613)*	*(24)*	*(16)*	*(40)*	*(23)*	*(22)*	*(45)*
Hotel Subtotal			***1,838***	***70***	***49***	***119***	***69***	***66***	***135***
Retail	820	9.147 ksf	391	6	3	9	16	18	34
Internal Capture Reduction - 20% [d]			*(78)*	*(1)*	*(1)*	*(2)*	*(3)*	*(4)*	*(7)*
Transit/Walk-In Reduction - 15% [c]			*(47)*	*(1)*	*0*	*(1)*	*(2)*	*(2)*	*(4)*
Pass-by Reduction - 20% [e]			*(53)*	*(1)*	*0*	*(1)*	*(2)*	*(2)*	*(4)*
Restaurant	932	4.694 ksf	597	28	23	51	28	18	46
Internal Capture Reduction - 20% [d]			*(119)*	*(6)*	*(5)*	*(11)*	*(6)*	*(4)*	*(10)*
Transit/Walk-In Reduction - 15% [c]			*(72)*	*(3)*	*(3)*	*(6)*	*(3)*	*(2)*	*(5)*
Pass-by Reduction - 20% [e]			*(81)*	*(4)*	*(3)*	*(7)*	*(4)*	*(2)*	*(6)*
Commercial Subtotal			***538***	***18***	***14***	***32***	***24***	***20***	***44***
TOTAL - ALTERNATIVE 4 PHASE 1 TRIPS			**2,376**	**88**	**63**	**151**	**93**	**86**	**179**
TDM Program									
Hotel	310	300 rooms	1,838	70	49	119	69	66	135
TDM Program Reduction - 10%			*(184)*	*(7)*	*(5)*	*(12)*	*(7)*	*(7)*	*(14)*
Hotel with TDM Program Subtotal			***1,654***	***63***	***44***	***107***	***62***	***59***	***121***
Retail	820	9.147 ksf	213	3	2	5	9	10	19
TDM Program Reduction - 10%			*(21)*	*0*	*0*	*0*	*(1)*	*(1)*	*(2)*
Restaurant	932	4.694 ksf	325	15	12	27	15	10	25
TDM Program Reduction - 10%			*(33)*	*(2)*	*(1)*	*(3)*	*(2)*	*(1)*	*(3)*
Commercial with TDM Program Subtotal			***484***	***16***	***13***	***29***	***21***	***18***	***39***
TOTAL - ALTERNATIVE 4 PHASE 1 TRIPS WITH TDM PROGRAM			**2,138**	**79**	**57**	**136**	**83**	**77**	**160**
TOTAL - DEIR PHASE 1 PROJECT TRIPS WITH TDM PROGRAM			**3,851**	**125**	**148**	**273**	**169**	**133**	**302**
DIFFERENCE (ALTERNATIVE 4 - DEIR)			**(1,713)**	**(46)**	**(91)**	**(137)**	**(86)**	**(56)**	**(142)**

Notes
[a] See Table 1.

TABLE 3
EXISTING WITH ALTERNATIVE 4 CONDITIONS (YEAR 2015)
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Existing		Existing with Alternative 4 - Phase 1				Existing with Alternative 4 with Mitigation - Phase 1			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
1.	Blaine Street/SR 110 SB On-Ramp &	AM	0.255	A	0.263	A	0.008	NO	0.262	A	0.007	NO
	11th Street	PM	0.506	A	0.516	A	0.010	NO	0.515	A	0.009	NO
2.	Bixel Street/SR 110 SB On-ramp &	AM	0.522	A	0.522	A	0.000	NO	0.522	A	0.000	NO
	8th Street	PM	0.465	A	0.465	A	0.000	NO	0.465	A	0.000	NO
3.	LA Live Way/SR 110 NB On-Ramp &	AM	0.169	A	0.171	A	0.002	NO	0.171	A	0.002	NO
	11th Street	PM	0.265	A	0.268	A	0.003	NO	0.268	A	0.003	NO
4.	LA Live Way/I-10 WB Off-Ramp/I-110 NB Off-Ramp &	AM	0.284	A	0.287	A	0.003	NO	0.287	A	0.003	NO
	Bond Street	PM	0.334	A	0.337	A	0.003	NO	0.337	A	0.003	NO
5.	Georgia Street/SR 110 NB On-Ramp &	AM	0.414	A	0.416	A	0.002	NO	0.416	A	0.002	NO
	9th Street	PM	0.283	A	0.285	A	0.002	NO	0.285	A	0.002	NO
6.	Georgia Street &	AM	0.366	A	0.372	A	0.006	NO	0.372	A	0.006	NO
	Olympic Boulevard	PM	0.440	A	0.449	A	0.009	NO	0.448	A	0.008	NO
7.	Francisco Street &	AM	0.338	A	0.338	A	0.000	NO	0.338	A	0.000	NO
	8th Street	PM	0.459	A	0.459	A	0.000	NO	0.459	A	0.000	NO
8.	Francisco Street &	AM	0.232	A	0.236	A	0.004	NO	0.235	A	0.003	NO
	9th Street/SR-110 NB Off-ramp	PM	0.226	A	0.230	A	0.004	NO	0.229	A	0.003	NO
9.	Francisco Street &	AM	0.322	A	0.327	A	0.005	NO	0.326	A	0.004	NO
	Olympic Boulevard	PM	0.400	A	0.405	A	0.005	NO	0.404	A	0.004	NO
10.	Figueroa Street &	AM	0.339	A	0.340	A	0.001	NO	0.340	A	0.001	NO
	8th Street	PM	0.358	A	0.359	A	0.001	NO	0.359	A	0.001	NO
11.	Figueroa Street &	AM	0.581	A	0.587	A	0.006	NO	0.587	A	0.006	NO
	9th Street	PM	0.387	A	0.395	A	0.008	NO	0.395	A	0.008	NO
12.	Figueroa Street &	AM	0.603	B	0.605	B	0.002	NO	0.605	B	0.002	NO
	Olympic Boulevard	PM	0.536	A	0.539	A	0.003	NO	0.539	A	0.003	NO
13.	Figueroa Street &	AM	0.460	A	0.491	A	0.031	NO	0.488	A	0.028	NO
	11th Street	PM	0.627	B	0.646	B	0.019	NO	0.644	B	0.017	NO
14.	Figueroa Street &	AM	0.357	A	0.365	A	0.008	NO	0.364	A	0.007	NO
	12th Street	PM	0.263	A	0.273	A	0.010	NO	0.272	A	0.009	NO
15.	Figueroa Street &	AM	0.623	B	0.623	B	0.000	NO	0.623	B	0.000	NO
	Pico Boulevard	PM	0.538	A	0.541	A	0.003	NO	0.541	A	0.003	NO
16.	Flower Street &	AM	0.284	A	0.284	A	0.000	NO	0.284	A	0.000	NO
	8th Street	PM	0.367	A	0.367	A	0.000	NO	0.367	A	0.000	NO
17.	Flower Street &	AM	0.231	A	0.237	A	0.006	NO	0.236	A	0.005	NO
	9th Street	PM	0.370	A	0.378	A	0.008	NO	0.377	A	0.007	NO
18.	Flower Street &	AM	0.552	A	0.555	A	0.003	NO	0.555	A	0.003	NO
	Olympic Boulevard	PM	0.617	B	0.617	B	0.000	NO	0.617	B	0.000	NO
19.	Flower Street &	AM	0.125	A	0.127	A	0.002	NO	0.127	A	0.002	NO
	11th Street	PM	0.440	A	0.445	A	0.005	NO	0.445	A	0.005	NO
20.	Flower Street &	AM	0.093	A	0.094	A	0.001	NO	0.094	A	0.001	NO
	12th Street	PM	0.327	A	0.333	A	0.006	NO	0.332	A	0.005	NO

TABLE 3 (CONTINUED)
EXISTING WITH ALTERNATIVE 4 CONDITIONS (YEAR 2015)
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Existing		Existing with Alternative 4 - Phase 1				Existing with Alternative 4 with Mitigation - Phase 1			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
21.	Flower Street &	AM	0.299	A	0.300	A	0.001	NO	0.299	A	0.000	NO
	Pico Boulevard	PM	0.593	A	0.594	A	0.001	NO	0.594	A	0.001	NO
22.	Hope Street &	AM	0.288	A	0.288	A	0.000	NO	0.288	A	0.000	NO
	9th Street	PM	0.359	A	0.359	A	0.000	NO	0.359	A	0.000	NO
23.	Hope Street &	AM	0.399	A	0.399	A	0.000	NO	0.399	A	0.000	NO
	Olympic Boulevard	PM	0.531	A	0.533	A	0.002	NO	0.533	A	0.002	NO
24.	Hope Street &	AM	0.093	A	0.095	A	0.002	NO	0.095	A	0.002	NO
	11th Street	PM	0.219	A	0.223	A	0.004	NO	0.223	A	0.004	NO
25.	Grand Avenue &	AM	0.431	A	0.431	A	0.000	NO	0.431	A	0.000	NO
	Olympic Boulevard	PM	0.655	B	0.655	B	0.000	NO	0.655	B	0.000	NO
26.	Grand Avenue &	AM	0.098	A	0.099	A	0.001	NO	0.099	A	0.001	NO
	11th Street	PM	0.334	A	0.337	A	0.003	NO	0.336	A	0.002	NO
27.	Grand Avenue &	AM	0.136	A	0.139	A	0.003	NO	0.139	A	0.003	NO
	12th Street	PM	0.347	A	0.352	A	0.005	NO	0.351	A	0.004	NO
28.	Grand Avenue &	AM	0.252	A	0.253	A	0.001	NO	0.253	A	0.001	NO
	Pico Boulevard	PM	0.433	A	0.435	A	0.002	NO	0.435	A	0.002	NO
29.	Grand Avenue &	AM	0.226	A	0.230	A	0.004	NO	0.230	A	0.004	NO
	Venice Boulevard	PM	0.443	A	0.447	A	0.004	NO	0.446	A	0.003	NO
30.	Grand Avenue &	AM	0.264	A	0.275	A	0.011	NO	0.195	A	-0.069	NO
	17th Street/I-10 WB On-Ramp	PM	0.703	C	0.719	C	0.016	NO	0.584	A	-0.119	NO
31.	Grand Avenue &	AM	0.395	A	0.397	A	0.002	NO	0.397	A	0.002	NO
	18th Street/I-10 EB Off-Ramp	PM	0.425	A	0.427	A	0.002	NO	0.427	A	0.002	NO
32.	Los Angeles Street &	AM	0.372	A	0.373	A	0.001	NO	0.373	A	0.001	NO
	17th Street/I-10 WB Off-Ramp	PM	0.421	A	0.423	A	0.002	NO	0.422	A	0.001	NO
33.	Los Angeles Street &	AM	0.443	A	0.443	A	0.000	NO	0.443	A	0.000	NO
	18th Street	PM	0.743	C	0.743	C	0.000	NO	0.743	C	0.000	NO
34.	Flower Street &	AM	0.300	A	0.301	A	0.001	NO	0.301	A	0.001	NO
	I-10 EB On-Ramp/18th Street	PM	0.438	A	0.438	A	0.000	NO	0.438	A	0.000	NO

TABLE 4
FUTURE WITH ALTERNATIVE 4 WITH MITIGATION CONDITIONS (YEAR 2020) - PHASE 1
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Future without Alternative 4		Future with Alternative 4 - Phase 1				Future with Alternative 4 with Mitigation - Phase 1			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
1.	Blaine Street/SR 110 SB On-Ramp &	AM	0.485	A	0.492	A	0.007	NO	0.492	A	0.007	NO
	11th Street	PM	0.698	B	0.708	C	0.010	NO	0.707	C	0.009	NO
2.	Bixel Street/SR 110 SB On-ramp &	AM	0.558	A	0.558	A	0.000	NO	0.558	A	0.000	NO
	8th Street	PM	0.553	A	0.553	A	0.000	NO	0.553	A	0.000	NO
3.	LA Live Way/SR 110 NB On-Ramp &	AM	0.247	A	0.250	A	0.003	NO	0.249	A	0.002	NO
	11th Street	PM	0.364	A	0.367	A	0.003	NO	0.366	A	0.002	NO
4.	LA Live Way/I-10 WB Off-Ramp/I-110 NB Off-Ramp &	AM	0.351	A	0.354	A	0.003	NO	0.353	A	0.002	NO
	Bond Street	PM	0.462	A	0.466	A	0.004	NO	0.466	A	0.004	NO
5.	Georgia Street/SR 110 NB On-Ramp &	AM	0.568	A	0.570	A	0.002	NO	0.569	A	0.001	NO
	9th Street	PM	0.445	A	0.447	A	0.002	NO	0.447	A	0.002	NO
6.	Georgia Street &	AM	0.571	A	0.577	A	0.006	NO	0.576	A	0.005	NO
	Olympic Boulevard	PM	0.621	B	0.631	B	0.010	NO	0.630	B	0.009	NO
7.	Francisco Street &	AM	0.564	A	0.564	A	0.000	NO	0.564	A	0.000	NO
	8th Street	PM	0.673	B	0.673	B	0.000	NO	0.673	B	0.000	NO
8.	Francisco Street &	AM	0.334	A	0.337	A	0.003	NO	0.337	A	0.003	NO
	9th Street/SR-110 NB Off-ramp	PM	0.428	A	0.432	A	0.004	NO	0.432	A	0.004	NO
9.	Francisco Street &	AM	0.418	A	0.424	A	0.006	NO	0.424	A	0.006	NO
	Olympic Boulevard	PM	0.560	A	0.565	A	0.005	NO	0.565	A	0.005	NO
10.	Figueroa Street &	AM	0.651	B	0.653	B	0.002	NO	0.653	B	0.002	NO
	8th Street	PM	0.612	B	0.615	B	0.003	NO	0.615	B	0.003	NO
11.	Figueroa Street &	AM	0.697	B	0.704	C	0.007	NO	0.703	C	0.006	NO
	9th Street	PM	0.615	B	0.625	B	0.010	NO	0.623	B	0.008	NO
12.	Figueroa Street &	AM	0.792	C	0.794	C	0.002	NO	0.794	C	0.002	NO
	Olympic Boulevard	PM	0.758	C	0.788	C	0.030	NO	0.785	C	0.027	NO
13.	Figueroa Street &	AM	0.669	B	0.699	B	0.030	NO	0.696	B	0.027	NO
	11th Street	PM	0.831	D	0.872	D	0.041	**YES**	0.867	D	0.036	**YES**
14.	Figueroa Street &	AM	0.680	B	0.689	B	0.009	NO	0.688	B	0.008	NO
	12th Street	PM	0.506	A	0.518	A	0.012	NO	0.516	A	0.010	NO
15.	Figueroa Street &	AM	1.009	F	1.013	F	0.004	NO	1.012	F	0.003	NO
	Pico Boulevard	PM	0.947	E	0.950	E	0.003	NO	0.950	E	0.003	NO
16.	Flower Street &	AM	0.401	A	0.401	A	0.000	NO	0.401	A	0.000	NO
	8th Street	PM	0.471	A	0.471	A	0.000	NO	0.471	A	0.000	NO
17.	Flower Street &	AM	0.315	A	0.321	A	0.006	NO	0.320	A	0.005	NO
	9th Street	PM	0.601	B	0.609	B	0.008	NO	0.609	B	0.008	NO
18.	Flower Street &	AM	0.631	B	0.634	B	0.003	NO	0.634	B	0.003	NO
	Olympic Boulevard	PM	0.779	C	0.779	C	0.000	NO	0.779	C	0.000	NO
19.	Flower Street &	AM	0.373	A	0.382	A	0.009	NO	0.380	A	0.007	NO
	11th Street	PM	0.965	E	0.975	E	0.010	**YES**	0.973	E	0.008	NO
20.	Flower Street &	AM	0.166	A	0.169	A	0.003	NO	0.169	A	0.003	NO
	12th Street	PM	0.506	A	0.510	A	0.004	NO	0.510	A	0.004	NO

TABLE 4 (CONTINUED)
FUTURE WITH ALTERNATIVE 4 WITH MITIGATION CONDITIONS (YEAR 2020) - PHASE 1
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Future without Alternative 4		Future with Alternative 4 - Phase 1				Future with Alternative 4 with Mitigation - Phase 1			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
21.	Flower Street &	AM	0.483	A	0.485	A	0.002	NO	0.484	A	0.001	NO
	Pico Boulevard	PM	0.887	D	0.889	D	0.002	NO	0.889	D	0.002	NO
22.	Hope Street &	AM	0.403	A	0.403	A	0.000	NO	0.403	A	0.000	NO
	9th Street	PM	0.587	A	0.587	A	0.000	NO	0.587	A	0.000	NO
23.	Hope Street &	AM	0.605	B	0.606	B	0.001	NO	0.605	B	0.000	NO
	Olympic Boulevard	PM	0.725	C	0.727	C	0.002	NO	0.727	C	0.002	NO
24.	Hope Street &	AM	0.336	A	0.342	A	0.006	NO	0.341	A	0.005	NO
	11th Street	PM	0.653	B	0.659	B	0.006	NO	0.659	B	0.006	NO
25.	Grand Avenue &	AM	0.541	A	0.541	A	0.000	NO	0.541	A	0.000	NO
	Olympic Boulevard	PM	0.960	E	0.960	E	0.000	NO	0.960	E	0.000	NO
26.	Grand Avenue &	AM	0.389	A	0.393	A	0.004	NO	0.393	A	0.004	NO
	11th Street	PM	0.861	D	0.865	D	0.004	NO	0.865	D	0.004	NO
27.	Grand Avenue &	AM	0.239	A	0.243	A	0.004	NO	0.243	A	0.004	NO
	12th Street	PM	0.485	A	0.493	A	0.008	NO	0.491	A	0.006	NO
28.	Grand Avenue &	AM	0.380	A	0.381	A	0.001	NO	0.381	A	0.001	NO
	Pico Boulevard	PM	0.645	B	0.648	B	0.003	NO	0.647	B	0.002	NO
29.	Grand Avenue &	AM	0.354	A	0.359	A	0.005	NO	0.359	A	0.005	NO
	Venice Boulevard	PM	0.575	A	0.581	A	0.006	NO	0.581	A	0.006	NO
30.	Grand Avenue &	AM	0.604	B	0.615	B	0.011	NO	0.471	A	-0.133	NO
	17th Street/I-10 WB On-Ramp	PM	1.090	F	1.106	F	0.016	**YES**	0.900	D	-0.190	NO
31.	Grand Avenue &	AM	0.531	A	0.533	A	0.002	NO	0.533	A	0.002	NO
	18th Street/I-10 EB Off-Ramp	PM	0.637	B	0.639	B	0.002	NO	0.638	B	0.001	NO
32.	Los Angeles Street &	AM	0.655	B	0.657	B	0.002	NO	0.656	B	0.001	NO
	17th Street/I-10 WB Off-Ramp	PM	0.829	D	0.831	D	0.002	NO	0.830	D	0.001	NO
33.	Los Angeles Street &	AM	0.669	B	0.669	B	0.000	NO	0.669	B	0.000	NO
	18th Street	PM	0.929	E	0.929	E	0.000	NO	0.929	E	0.000	NO
34.	Flower Street &	AM	0.410	A	0.411	A	0.001	NO	0.411	A	0.001	NO
	I-10 EB On-Ramp/18th Street	PM	0.475	A	0.475	A	0.000	NO	0.475	A	0.000	NO

TABLE 5
TRIP GENERATION ESTIMATES - ALTERNATIVE 4 - FULL BUILDOUT

TRIP GENERATION RATES[a]									
Land Use	ITE Land Use	Rate	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
High-Rise Condominium	232	per dwelling unit	[b]	19%	81%	[b]	62%	38%	[b]
Hotel	310	per room	8.17	59%	41%	0.53	51%	49%	0.60
Shopping Center	820	per ksf	42.70	62%	38%	0.96	48%	52%	3.71
High-Turnover Restaurant	932	per ksf	127.15	55%	45%	10.81	60%	40%	9.85

TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project									
High-Rise Condominium	232	435 du	1,864	29	126	155	101	62	163
Transit/Walk-In Reduction - 20% [c]			*(373)*	*(6)*	*(25)*	*(31)*	*(20)*	*(12)*	*(32)*
Residential Subtotal			***1,491***	***23***	***101***	***124***	***81***	***50***	***131***
Hotel	310	300 rooms	2,451	94	65	159	92	88	180
Transit/Walk-In Reduction - 25% [c]			*(613)*	*(24)*	*(16)*	*(40)*	*(23)*	*(22)*	*(45)*
Hotel Subtotal			***1,838***	***70***	***49***	***119***	***69***	***66***	***135***
Retail	820	31.721 ksf	1,354	19	11	30	57	61	118
Internal Capture Reduction - 20% [d]			*(271)*	*(4)*	*(2)*	*(6)*	*(11)*	*(12)*	*(23)*
Transit/Walk-In Reduction - 15% [c]			*(162)*	*(2)*	*(1)*	*(3)*	*(7)*	*(7)*	*(14)*
Pass-by Reduction - 20% [e]			*(184)*	*(3)*	*(2)*	*(5)*	*(8)*	*(8)*	*(16)*
Restaurant	932	27.238 ksf	3,463	162	132	294	161	107	268
Internal Capture Reduction - 20% [d]			*(693)*	*(32)*	*(26)*	*(58)*	*(32)*	*(21)*	*(53)*
Transit/Walk-In Reduction - 15% [c]			*(416)*	*(20)*	*(16)*	*(36)*	*(19)*	*(13)*	*(32)*
Pass-by Reduction - 20% [e]			*(471)*	*(22)*	*(18)*	*(40)*	*(22)*	*(15)*	*(37)*
Commercial Subtotal			**2,620**	**98**	**78**	**176**	**119**	**92**	**211**
Existing Hotel to be Removed									
Hotel	310	178 rooms	1,454	55	39	94	55	52	107
Transit/Walk-In Reduction - 25% [c]			*(364)*	*(14)*	*(10)*	*(24)*	*(14)*	*(13)*	*(27)*
Existing Use Subtotal			***1,090***	***41***	***29***	***70***	***41***	***39***	***80***
TOTAL - ALTERNATIVE 4 FULL BUILDOUT TRIPS			**4,859**	**150**	**199**	**349**	**228**	**169**	**397**
TOTAL - DEIR FULL BUILDOUT PROJECT TRIPS			**6,583**	**204**	**274**	**478**	**312**	**227**	**539**
DIFFERENCE (ALTERNATIVE 4 - DEIR)			**(1,724)**	**(54)**	**(75)**	**(129)**	**(84)**	**(58)**	**(142)**

Notes:
[1] Dwelling Unit = DU.
[2] 1,000 square feet = ksf.
[a] Source: *Trip Generation, 9th Edition*, Institute of Transportation Engineers, 2012.
[b] Trip generation rate based on the best-fit curve formula listed in the ITE for the High-Rise Condominium land use.

Daily - T = 3.77 (X) + 223.66 T = Average Vehicle Trips X = Gross Leasable Area (ksf)
A.M. Peak Hour - T = 0.29 (X) + 28.86
P.M. Peak Hour - T = 0.34 (X) + 15.47

[c] Per LADOT's *Traffic Study Policies and Procedures,* the Project Site is located within a 1/4 mile walking distance from a transit station or RapidBus stop, therefore a transit reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments, and for arrivals via taxi, tour bus, and carpool services.
[d] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (e.g., residents and hotel guests visiting the retail/restaurant uses)
[e] Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

TABLE 6
TRIP GENERATION ESTIMATES - ALTERNATIVE 4 - FULL BUILDOUT
WITH TDM PROGRAM

Land Use	ITE Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Alternative 4 Trip Generation [a]									
High-Rise Condominium	232	435 du	1,864	29	126	155	101	62	163
Transit/Walk-In Reduction - 20% [c]			*(373)*	*(6)*	*(25)*	*(31)*	*(20)*	*(12)*	*(32)*
Residential Subtotal			***1,491***	***23***	***101***	***124***	***81***	***50***	***131***
Hotel	310	300 rooms	2,451	94	65	159	92	88	180
Transit/Walk-In Reduction - 25% [c]			*(613)*	*(24)*	*(16)*	*(40)*	*(23)*	*(22)*	*(45)*
Hotel Subtotal			***1,838***	***70***	***49***	***119***	***69***	***66***	***135***
Retail	820	31.721 ksf	1,354	19	11	30	57	61	118
Internal Capture Reduction - 20% [d]			*(271)*	*(4)*	*(2)*	*(6)*	*(11)*	*(12)*	*(23)*
Transit/Walk-In Reduction - 15% [c]			*(162)*	*(2)*	*(1)*	*(3)*	*(7)*	*(7)*	*(14)*
Pass-by Reduction - 20% [e]			*(184)*	*(3)*	*(2)*	*(5)*	*(8)*	*(8)*	*(16)*
Restaurant	932	27.238 ksf	3,463	162	132	294	161	107	268
Internal Capture Reduction - 20% [d]			*(693)*	*(32)*	*(26)*	*(58)*	*(32)*	*(21)*	*(53)*
Transit/Walk-In Reduction - 15% [c]			*(416)*	*(20)*	*(16)*	*(36)*	*(19)*	*(13)*	*(32)*
Pass-by Reduction - 20% [e]			*(471)*	*(22)*	*(18)*	*(40)*	*(22)*	*(15)*	*(37)*
Commercial Subtotal			***2,620***	***98***	***78***	***176***	***119***	***92***	***211***
TOTAL - ALTERNATIVE 4 FULL BUILDOUT TRIPS			**5,949**	**191**	**228**	**419**	**269**	**208**	**477**
TDM Program									
High-Rise Condominium	232	435 du	1,491	23	101	124	81	50	131
TDM Program Reduction - 10%			*(149)*	*(2)*	*(10)*	*(12)*	*(8)*	*(5)*	*(13)*
Residential with TDM Program Subtotal			***1,342***	***21***	***91***	***112***	***73***	***45***	***118***
Hotel	310	300 rooms	1,838	70	49	119	69	66	135
TDM Program Reduction - 10%			*(184)*	*(7)*	*(5)*	*(12)*	*(7)*	*(7)*	*(14)*
Hotel with TDM Program Subtotal			***1,654***	***63***	***44***	***107***	***62***	***59***	***121***
Retail	820	31.721 ksf	737	10	6	16	31	34	65
TDM Program Reduction - 10%			*(74)*	*(1)*	*(1)*	*(2)*	*(3)*	*(3)*	*(6)*
Restaurant	932	27.238 ksf	1,883	88	72	160	88	58	146
TDM Program Reduction - 10%			*(188)*	*(9)*	*(7)*	*(16)*	*(9)*	*(6)*	*(15)*
Commercial with TDM Program Subtotal			***2,358***	***88***	***70***	***158***	***107***	***83***	***190***
TOTAL - ALTERNATIVE 4 FULL BUILDOUT TRIPS WITH TDM PROGRAM			**5,354**	**172**	**205**	**377**	**242**	**187**	**429**
Existing Hotel to be Removed									
Hotel	310	178 rooms	1,454	55	39	94	55	52	107
Transit/Walk-In Reduction - 25% [c]			*(364)*	*(14)*	*(10)*	*(24)*	*(14)*	*(13)*	*(27)*
Existing Use Subtotal			***1,090***	***41***	***29***	***70***	***41***	***39***	***80***
TOTAL - NET NEW ALTERNATIVE 4 FULL BUILDOUT TRIPS WITH TDM PROGRAM			**4,264**	**131**	**176**	**307**	**201**	**148**	**349**
TOTAL - NET NEW DEIR FULL BUILDOUT PROJECT TRIPS WITH TDM PROGRAM			**5,815**	**180**	**243**	**423**	**276**	**200**	**476**
DIFFERENCE (ALTERNATIVE 4 - DEIR)			**(1,551)**	**(49)**	**(67)**	**(116)**	**(75)**	**(52)**	**(127)**

Notes
[a] See Table 5.

TABLE 7
EXISTING WITH ALTERNATIVE 4 CONDITIONS (YEAR 2015) - FULL BUILDOUT
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Existing		Existing with Alternative 4 - Full Buildout				Existing with Alternative 4 with Mitigation - Full Buildout			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
1.	Blaine Street/SR 110 SB On-Ramp &	AM	0.255	A	0.273	A	0.018	NO	0.270	A	0.015	NO
	11th Street	PM	0.506	A	0.520	A	0.014	NO	0.518	A	0.012	NO
2.	Bixel Street/SR 110 SB On-ramp &	AM	0.522	A	0.522	A	0.000	NO	0.522	A	0.000	NO
	8th Street	PM	0.465	A	0.465	A	0.000	NO	0.465	A	0.000	NO
3.	LA Live Way/SR 110 NB On-Ramp &	AM	0.169	A	0.175	A	0.006	NO	0.174	A	0.005	NO
	11th Street	PM	0.265	A	0.274	A	0.009	NO	0.273	A	0.008	NO
4.	LA Live Way/I-10 WB Off-Ramp/I-110 NB Off-Ramp &	AM	0.284	A	0.289	A	0.005	NO	0.288	A	0.004	NO
	Bond Street	PM	0.334	A	0.341	A	0.007	NO	0.341	A	0.007	NO
5.	Georgia Street/SR 110 NB On-Ramp &	AM	0.414	A	0.421	A	0.007	NO	0.420	A	0.006	NO
	9th Street	PM	0.283	A	0.288	A	0.005	NO	0.287	A	0.004	NO
6.	Georgia Street &	AM	0.366	A	0.381	A	0.015	NO	0.379	A	0.013	NO
	Olympic Boulevard	PM	0.440	A	0.454	A	0.014	NO	0.452	A	0.012	NO
7.	Francisco Street &	AM	0.338	A	0.339	A	0.001	NO	0.339	A	0.001	NO
	8th Street	PM	0.459	A	0.460	A	0.001	NO	0.460	A	0.001	NO
8.	Francisco Street &	AM	0.232	A	0.238	A	0.006	NO	0.237	A	0.005	NO
	9th Street/SR-110 NB Off-ramp	PM	0.226	A	0.235	A	0.009	NO	0.233	A	0.007	NO
9.	Francisco Street &	AM	0.322	A	0.333	A	0.011	NO	0.331	A	0.009	NO
	Olympic Boulevard	PM	0.400	A	0.415	A	0.015	NO	0.413	A	0.013	NO
10.	Figueroa Street &	AM	0.339	A	0.343	A	0.004	NO	0.343	A	0.004	NO
	8th Street	PM	0.358	A	0.361	A	0.003	NO	0.361	A	0.003	NO
11.	Figueroa Street &	AM	0.581	A	0.597	A	0.016	NO	0.594	A	0.013	NO
	9th Street	PM	0.387	A	0.406	A	0.019	NO	0.404	A	0.017	NO
12.	Figueroa Street &	AM	0.603	B	0.612	B	0.009	NO	0.611	B	0.008	NO
	Olympic Boulevard	PM	0.536	A	0.543	A	0.007	NO	0.542	A	0.006	NO
13.	Figueroa Street &	AM	0.460	A	0.545	A	0.085	NO	0.534	A	0.074	NO
	11th Street	PM	0.627	B	0.693	B	0.066	NO	0.679	B	0.052	NO
14.	Figueroa Street &	AM	0.357	A	0.365	A	0.008	NO	0.364	A	0.007	NO
	12th Street	PM	0.263	A	0.273	A	0.010	NO	0.272	A	0.009	NO
15.	Figueroa Street &	AM	0.623	B	0.624	B	0.001	NO	0.624	B	0.001	NO
	Pico Boulevard	PM	0.538	A	0.538	A	0.000	NO	0.536	A	-0.002	NO
16.	Flower Street &	AM	0.284	A	0.284	A	0.000	NO	0.284	A	0.000	NO
	8th Street	PM	0.367	A	0.367	A	0.000	NO	0.367	A	0.000	NO
17.	Flower Street &	AM	0.231	A	0.239	A	0.008	NO	0.238	A	0.007	NO
	9th Street	PM	0.370	A	0.403	A	0.033	NO	0.395	A	0.025	NO
18.	Flower Street &	AM	0.552	A	0.568	A	0.016	NO	0.567	A	0.015	NO
	Olympic Boulevard	PM	0.617	B	0.617	B	0.000	NO	0.617	B	0.000	NO
19.	Flower Street &	AM	0.125	A	0.169	A	0.044	NO	0.157	A	0.032	NO
	11th Street	PM	0.440	A	0.460	A	0.020	NO	0.457	A	0.017	NO
20.	Flower Street &	AM	0.093	A	0.097	A	0.004	NO	0.096	A	0.003	NO
	12th Street	PM	0.327	A	0.336	A	0.009	NO	0.335	A	0.008	NO

TABLE 7 (CONTINUED)
EXISTING WITH ALTERNATIVE 4 CONDITIONS (YEAR 2015) - FULL BUILDOUT
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Existing		Existing with Alternative 4 - Full Buildout				Existing with Alternative 4 with Mitigation - Full Buildout			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
21.	Flower Street &	AM	0.299	A	0.305	A	0.006	NO	0.304	A	0.005	NO
	Pico Boulevard	PM	0.593	A	0.597	A	0.004	NO	0.596	A	0.003	NO
22.	Hope Street &	AM	0.288	A	0.288	A	0.000	NO	0.288	A	0.000	NO
	9th Street	PM	0.359	A	0.359	A	0.000	NO	0.359	A	0.000	NO
23.	Hope Street &	AM	0.399	A	0.404	A	0.005	NO	0.403	A	0.004	NO
	Olympic Boulevard	PM	0.531	A	0.542	A	0.011	NO	0.541	A	0.010	NO
24.	Hope Street &	AM	0.093	A	0.096	A	0.003	NO	0.096	A	0.003	NO
	11th Street	PM	0.219	A	0.233	A	0.014	NO	0.232	A	0.013	NO
25.	Grand Avenue &	AM	0.431	A	0.434	A	0.003	NO	0.434	A	0.003	NO
	Olympic Boulevard	PM	0.655	B	0.657	B	0.002	NO	0.657	B	0.002	NO
26.	Grand Avenue &	AM	0.098	A	0.099	A	0.001	NO	0.099	A	0.001	NO
	11th Street	PM	0.334	A	0.337	A	0.003	NO	0.336	A	0.002	NO
27.	Grand Avenue &	AM	0.136	A	0.149	A	0.013	NO	0.148	A	0.012	NO
	12th Street	PM	0.347	A	0.361	A	0.014	NO	0.359	A	0.012	NO
28.	Grand Avenue &	AM	0.252	A	0.259	A	0.007	NO	0.259	A	0.007	NO
	Pico Boulevard	PM	0.433	A	0.440	A	0.007	NO	0.439	A	0.006	NO
29.	Grand Avenue &	AM	0.226	A	0.240	A	0.014	NO	0.239	A	0.013	NO
	Venice Boulevard	PM	0.443	A	0.453	A	0.010	NO	0.451	A	0.008	NO
30.	Grand Avenue &	AM	0.264	A	0.300	A	0.036	NO	0.216	A	-0.048	NO
	17th Street/I-10 WB On-Ramp	PM	0.703	C	0.741	C	0.038	NO	0.603	B	-0.100	NO
31.	Grand Avenue &	AM	0.395	A	0.399	A	0.004	NO	0.399	A	0.004	NO
	18th Street/I-10 EB Off-Ramp	PM	0.425	A	0.432	A	0.007	NO	0.431	A	0.006	NO
32.	Los Angeles Street &	AM	0.372	A	0.377	A	0.005	NO	0.377	A	0.005	NO
	17th Street/I-10 WB Off-Ramp	PM	0.421	A	0.427	A	0.006	NO	0.427	A	0.006	NO
33.	Los Angeles Street &	AM	0.443	A	0.443	A	0.000	NO	0.443	A	0.000	NO
	18th Street	PM	0.743	C	0.743	C	0.000	NO	0.743	C	0.000	NO
34.	Flower Street &	AM	0.300	A	0.304	A	0.004	NO	0.303	A	0.003	NO
	I-10 EB On-Ramp/18th Street	PM	0.438	A	0.439	A	0.001	NO	0.439	A	0.001	NO

TABLE 8
FUTURE WITH ALTERNATIVE 4 WITH MITIGATION CONDITIONS (YEAR 2023) - FULL BUILDOUT
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Future without Alternative 4		Future with Alternative 4 - Full Buildout				Future with Alternative 4 with Mitigation - Full Buildout			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
1.	Blaine Street/SR 110 SB On-Ramp &	AM	0.495	A	0.513	A	0.018	NO	0.510	A	0.015	NO
	11th Street	PM	0.718	C	0.732	C	0.014	NO	0.729	C	0.011	NO
2.	Bixel Street/SR 110 SB On-ramp &	AM	0.576	A	0.576	A	0.000	NO	0.576	A	0.000	NO
	8th Street	PM	0.571	A	0.571	A	0.000	NO	0.571	A	0.000	NO
3.	LA Live Way/SR 110 NB On-Ramp &	AM	0.255	A	0.261	A	0.006	NO	0.261	A	0.006	NO
	11th Street	PM	0.375	A	0.384	A	0.009	NO	0.383	A	0.008	NO
4.	LA Live Way/I-10 WB Off-Ramp/I-110 NB Off-Ramp &	AM	0.363	A	0.369	A	0.006	NO	0.368	A	0.005	NO
	Bond Street	PM	0.476	A	0.485	A	0.009	NO	0.483	A	0.007	NO
5.	Georgia Street/SR 110 NB On-Ramp &	AM	0.585	A	0.591	A	0.006	NO	0.590	A	0.005	NO
	9th Street	PM	0.457	A	0.462	A	0.005	NO	0.461	A	0.004	NO
6.	Georgia Street &	AM	0.585	A	0.601	B	0.016	NO	0.599	A	0.014	NO
	Olympic Boulevard	PM	0.640	B	0.654	B	0.014	NO	0.652	B	0.012	NO
7.	Francisco Street &	AM	0.577	A	0.579	A	0.002	NO	0.579	A	0.002	NO
	8th Street	PM	0.691	B	0.692	B	0.001	NO	0.692	B	0.001	NO
8.	Francisco Street &	AM	0.344	A	0.350	A	0.006	NO	0.349	A	0.005	NO
	9th Street/SR-110 NB Off-ramp	PM	0.439	A	0.447	A	0.008	NO	0.446	A	0.007	NO
9.	Francisco Street &	AM	0.429	A	0.445	A	0.016	NO	0.443	A	0.014	NO
	Olympic Boulevard	PM	0.575	A	0.590	A	0.015	NO	0.588	A	0.013	NO
10.	Figueroa Street &	AM	0.670	B	0.679	B	0.009	NO	0.678	B	0.008	NO
	8th Street	PM	0.631	B	0.637	B	0.006	NO	0.637	B	0.006	NO
11.	Figueroa Street &	AM	0.719	C	0.734	C	0.015	NO	0.732	C	0.013	NO
	9th Street	PM	0.631	B	0.651	B	0.020	NO	0.649	B	0.018	NO
12.	Figueroa Street &	AM	0.814	D	0.824	D	0.010	NO	0.822	D	0.008	NO
	Olympic Boulevard	PM	0.775	C	0.827	D	0.052	**YES**	0.820	D	0.045	**YES**
13.	Figueroa Street &	AM	0.686	B	0.771	C	0.085	**YES**	0.760	C	0.074	**YES**
	11th Street	PM	0.853	D	0.963	E	0.110	**YES**	0.949	E	0.096	**YES**
14.	Figueroa Street &	AM	0.701	C	0.710	C	0.009	NO	0.708	C	0.007	NO
	12th Street	PM	0.524	A	0.534	A	0.010	NO	0.533	A	0.009	NO
15.	Figueroa Street &	AM	1.036	F	1.035	F	-0.001	NO	1.035	F	-0.001	NO
	Pico Boulevard	PM	0.972	E	0.973	E	0.001	NO	0.971	E	-0.001	NO
16.	Flower Street &	AM	0.413	A	0.413	A	0.000	NO	0.413	A	0.000	NO
	8th Street	PM	0.485	A	0.485	A	0.000	NO	0.485	A	0.000	NO
17.	Flower Street &	AM	0.325	A	0.334	A	0.009	NO	0.333	A	0.008	NO
	9th Street	PM	0.617	B	0.635	B	0.018	NO	0.633	B	0.016	NO
18.	Flower Street &	AM	0.651	B	0.667	B	0.016	NO	0.665	B	0.014	NO
	Olympic Boulevard	PM	0.802	D	0.802	D	0.000	NO	0.802	D	0.000	NO
19.	Flower Street &	AM	0.381	A	0.405	A	0.024	NO	0.402	A	0.021	NO
	11th Street	PM	0.989	E	1.019	F	0.030	**YES**	1.016	F	0.027	**YES**
20.	Flower Street &	AM	0.172	A	0.181	A	0.009	NO	0.180	A	0.008	NO
	12th Street	PM	0.520	A	0.526	A	0.006	NO	0.526	A	0.006	NO

TABLE 8 (CONTINUED)
FUTURE WITH ALTERNATIVE 4 WITH MITIGATION CONDITIONS (YEAR 2023) - FULL BUILDOUT
SIGNIFICANT IMPACT ANALYSIS

No	Intersection	Peak Hour	Future without Alternative 4		Future with Alternative 4 - Full Buildout				Future with Alternative 4 with Mitigation - Full Buildout			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact	V/C	LOS	Change in V/C	Significant Impact
21.	Flower Street &	AM	0.496	A	0.501	A	0.005	NO	0.501	A	0.005	NO
	Pico Boulevard	PM	0.911	E	0.915	E	0.004	NO	0.915	E	0.004	NO
22.	Hope Street &	AM	0.415	A	0.415	A	0.000	NO	0.415	A	0.000	NO
	9th Street	PM	0.601	B	0.601	B	0.000	NO	0.601	B	0.000	NO
23.	Hope Street &	AM	0.619	B	0.625	B	0.006	NO	0.625	B	0.006	NO
	Olympic Boulevard	PM	0.746	C	0.756	C	0.010	NO	0.755	C	0.009	NO
24.	Hope Street &	AM	0.343	A	0.352	A	0.009	NO	0.351	A	0.008	NO
	11th Street	PM	0.666	B	0.683	B	0.017	NO	0.681	B	0.015	NO
25.	Grand Avenue &	AM	0.557	A	0.561	A	0.004	NO	0.560	A	0.003	NO
	Olympic Boulevard	PM	0.983	E	0.985	E	0.002	NO	0.985	E	0.002	NO
26.	Grand Avenue &	AM	0.396	A	0.401	A	0.005	NO	0.400	A	0.004	NO
	11th Street	PM	0.879	D	0.884	D	0.005	NO	0.883	D	0.004	NO
27.	Grand Avenue &	AM	0.247	A	0.261	A	0.014	NO	0.259	A	0.012	NO
	12th Street	PM	0.498	A	0.521	A	0.023	NO	0.519	A	0.021	NO
28.	Grand Avenue &	AM	0.391	A	0.399	A	0.008	NO	0.398	A	0.007	NO
	Pico Boulevard	PM	0.663	B	0.671	B	0.008	NO	0.670	B	0.007	NO
29.	Grand Avenue &	AM	0.365	A	0.380	A	0.015	NO	0.378	A	0.013	NO
	Venice Boulevard	PM	0.591	A	0.604	B	0.013	NO	0.603	B	0.012	NO
30.	Grand Avenue &	AM	0.615	B	0.651	B	0.036	NO	0.502	A	-0.113	NO
	17th Street/I-10 WB On-Ramp	PM	1.117	F	1.155	F	0.038	**YES**	0.942	E	-0.175	NO
31.	Grand Avenue &	AM	0.547	A	0.552	A	0.005	NO	0.551	A	0.004	NO
	18th Street/I-10 EB Off-Ramp	PM	0.653	B	0.659	B	0.006	NO	0.659	B	0.006	NO
32.	Los Angeles Street &	AM	0.670	B	0.675	B	0.005	NO	0.675	B	0.005	NO
	17th Street/I-10 WB Off-Ramp	PM	0.846	D	0.852	D	0.006	NO	0.851	D	0.005	NO
33.	Los Angeles Street &	AM	0.686	B	0.686	B	0.000	NO	0.686	B	0.000	NO
	18th Street	PM	0.954	E	0.954	E	0.000	NO	0.954	E	0.000	NO
34.	Flower Street &	AM	0.423	A	0.426	A	0.003	NO	0.426	A	0.003	NO
	I-10 EB On-Ramp/18th Street	PM	0.493	A	0.494	A	0.001	NO	0.494	A	0.001	NO

TABLE 9
CODE AUTOMOBILE PARKING REQUIREMENTS

Land Use	Parking Rate [a]	Phase 1		Phase II	
		Size	Total Spaces	Size	Total Spaces
Residential [b]					
≤ 3 Habitable Rooms	1.00 sp / 1 du			210 du	210
> 3 Habitable Rooms	1.25 sp / 1 du			225 du	281
Commercial [c]	1.00 sp / 1,000 sf	13,841 sf	14	45,118 sf	45
Hotel [d]					
First 20 Guestrooms	1.00 sp / 2 room	20 room	10		
Next 20 Guestrooms	1.00 sp / 4 room	20 room	5		
Remaining Guestrooms	1.00 sp / 6 room	260 room	43		
Banquet/Conference Space [c]	1.00 sp / 100 sf	20,681 sf	207		
Total Code Parking Requirement			**279**		**536**
Bicycle Parking Reduction					
Residential [e]			--		*(74)*
Hotel/Commercial [f]			--		--
Net Code Parking Requirement			**279**		**462**
Total Alternative 4 (Phase I + Phase II) Net Code Parking Requirement			**741**		

Notes
[a] Parking rates from Section 12.21A.4 of the *Los Angeles Municipal Code*, City of Los Angeles, 2015, unless otherwise noted.
[b] Per Section 12.21.A4(p)(1), for residential uses within the Central City Parking District with more than six dwelling units or more than three habitable rooms.
[c] Per Section 12.21.A4(i), for commercial uses within the Downtown Parking District with a gross floor area of 7,500 sf or more.
[d] Parking rates per Section 12.21.A4(p)(2), for hotel uses within the Central City Parking District.
[e] Per Section 12.21.A4, residential buildings within 1,500 feet of a fixed transit station may replace up to 15% of automobile parking spaces with bicycle parking spaces.
[f] Per Section 12.21.A4, nonresidential buildings within 1,500 feet of a fixed transit station may replace up to 30% of automobile parking spaces with bicycle parking spaces.

TABLE 10
CODE BICYCLE PARKING REQUIREMENTS

Project	Parking Rate [a]		Phase 1				Phase II			
	Short-Term	Long-Term	Short-Term		Long-Term		Short-Term		Long-Term	
			Size	Total	Size	Total	Size	Total	Size	Total
Residential	1.00 sp / 10 du	1.00 sp / 1 du	0 du	0	0 du	0	435 du	44	435 du	435
Commercial	1.00 sp / 2,000 sf	1.00 sp / 2,000 sf	13,841 sf	7	13,841 sf	7	45,118 sf	23	45,118 sf	23
Hotel	1.00 sp / 20 rooms	1.00 sp / 20 rooms	300 rooms	15	300 rooms	15	0 rooms	0	0 rooms	0
Banquet/Conference Space	1.00 sp / 350 sf	1.00 sp / 700 sf	20,681 sf	59	20,681 sf	30	0 sf	0	0 sf	0
Total				**81**		**52**		**67**		**458**
Total Code Bicycle Parking Requirement						**133**				**525**
Total Alternative 4 (Phase I + Phase II) Code Bicycle Parking Requirement			**658**							

Notes
[a] Bicycle parking rates per Section 12.21.A16(a).