

DRAFT
Environmental Impact Report
and Appendix A

Volume 2

THE
GRAND AVENUE PROJECT

State Clearinghouse No. 2005091041



PCR

June 2006

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GRAND AVENUE PROJECT

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IV. ENVIRONMENTAL IMPACT ANALYSIS
E. POPULATION, HOUSING AND EMPLOYMENT

1. INTRODUCTION

This Section of the Draft EIR addresses the Project's impacts on the population and housing growth within the Project's immediate area (i.e., the census tract within which the Project site is located), within a Local Area, (the City of Los Angeles Central City Community Plan area), and the Southern California Association of Governments (SCAG), City of Los Angeles Subregion. The analysis also addresses the Project's population, housing and employment impacts in relation to adopted growth forecasts (i.e., SCAG's Regional Transportation Plan (RTP)). The analysis also addresses the Project's impacts on the relationship between total jobs and housing in the Local Area and the Subregion as an indicator of potential Project effects on policies intended to improve the efficiency of accessibility within the region and reduce vehicle miles traveled. The analysis is related to, and shares information with that presented in Section IV.A, Land Use. As an example, the Land Use analysis provides a comprehensive evaluation of the Project's consistency with applicable land use policies and regulations, as well as the compatibility of the Project with the surrounding uses in the area, with regard to the arrangement of uses, densities, etc.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) Southern California Association of Governments (SCAG)

SCAG is the region's federally designated metropolitan planning organization (MPO), and was formed for the purpose of developing consensus and coordination relating to regional issues that cross jurisdictional boundaries. The SCAG Region is comprised of six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial. SCAG is responsible for, among other things, preparing the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). The RTP contains a set of socioeconomic projections that are used as the basis for SCAG's transportation planning. They include projections of total population, households, and employment at the regional, county, subregional, and jurisdictional levels. SCAG's 2004 RTP population and household forecasts, the latest available forecasts, are used as the basis for the analysis contained in this section of the Draft EIR. SCAG also adopted its regional growth vision, the Compass Vision Report, in 2004. It includes a technical analysis

of growth options as well as human evaluation including a wide range of public outreach efforts and stakeholder involvement. The goal of the Compass project is to examine ways that the current growth trends in the Region can be directed to a sustainable, livable future.

(a) Regional Comprehensive Plan and Guide (RCPG)

SCAG prepared the Regional Comprehensive Plan and Guide (RCPG) in conjunction with its constituent members and other regional planning agencies. Adopted in May 1995, and updated in March 1996, the RCPG is intended to serve as a framework to guide decision-making with respect to the growth and changes that can be anticipated by the year 2015 and beyond. The RCPG provides a general view of various regional plans. At the regional level, the goals, objectives and policies in the RCPG are relevant yardsticks for measuring consistency with adopted plans. However, the authority and responsibility for land use and other critical planning decisions rest with individual city and county governments. Accordingly, the RCPG proposes a strategy for local governments to use, voluntarily, to address issues related to future growth and to provide a means for assessing the potential impacts of projects within the context of the region.

The Growth Management Chapter (GMC) of the RCPG addresses issues related to growth and land use in the SCAG Region and describes guiding principles for development that support the overall goals of the RCPG.

The Housing Chapter of the RCPG, adopted September 1994, is not mandated and does not establish any requirements for local governments. However, SCAG is responsible for assisting cities and counties in fulfilling their statutory obligations to prepare and regularly update the Housing Elements of their respective General Plans. The Housing Chapter of the RCPG is intended to provide the broad picture of housing issues affecting the region and to assist local governments in meeting this requirement. By providing a regional framework for local housing strategies that are responsive to market area needs and state mandates, the Housing Chapter is a guide for coordinating local housing development strategies within Southern California. It also includes a set of goals associated with increasing the supply of housing in the Region, particularly housing that is affordable to low- and moderate-income households. No formal policies are provided in this component of the RCPG..

(b) Regional Transportation Plan (RTP)

DESTINATION 2030 is the 2004 Regional Transportation Plan (RTP) for the six county Region. SCAG's Regional Council adopted the RTP in April 2004. SCAG is required to develop, maintain and update the RTP on a three year cycle. The RTP is focused on improving the balance between land use and transportation systems, and it contains policies to guide future

regional decisions. The most current SCAG population, housing, and employment forecasts are the adopted 2004 RTP Regionwide, subregion, and County forecasts for the years 2005, 2010, 2015, 2020, and 2025. Growth projections for the year 2030 are also set forth in the 2004 RTP with the assumption that existing land use policies will be continued throughout this time.

(c) Compass Vision Report

The Compass Vision Report outlines a future for the region that includes the creation of sustainable communities based on mobility, livability, prosperity, and sustainability. The Compass Vision is implemented by SCAG through its “2% Strategy.” The 2% Strategy focuses on mixed-use infill and redevelopment in strategic locations that are near existing and proposed transit within the region. The Compass Vision Report contains “Regional Growth Principles” that are proposed to provide a framework for local and regional decision making.

(d) Listing of SCAG Policies

A detailed listing of SCAG policies pertaining to population and housing is provided in Table 10 on page 199 in Section IV.A, Land Use. Table 10 includes RCPG policies, RTP Policies, and Compass Vision Report-Growth Visioning Principles. It also compares the Project features to the development anticipated in the policies, and evaluates Project consistency with the Policies and Visioning Principles.

(2) City of Los Angeles

(a) Citywide General Plan Framework

The Citywide General Plan Framework, an element of the City of Los Angeles General Plan and General Plan System, was approved in December 1996 and readopted in August 2001. The Framework sets forth a citywide, comprehensive, long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Housing Chapter of the Framework elaborates on the City’s adopted Housing Element to ensure the provision of housing for the City’s existing and future residents. A detailed listing of General Plan Framework policies that are applicable to the Project is provided in Table 5 on page 175 in Section IV.A, Land Use. Table 5 also compares the Project features to the development anticipated in the policies, and evaluates Project consistency with the policies.

(b) General Plan Housing Element.

According to the 2002 Housing Element of the Los Angeles General Plan, the City's overall housing goal is to create a city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure and services. Within this context, the City has established specific goals which provide the basis for addressing its housing needs.¹¹⁴ The goals of the Housing Element include: (1) the availability of an adequate supply of ownership and rental housing affordable to people of all income levels, races, ages, and suitable for all needs; (2) to preserve, stabilize, and enhance livability/sustainability in all neighborhoods throughout the City, and maintain the quality of life in all residential areas; (3) the availability of equal housing opportunities for all without discrimination; and (4) the provision of incentives and the reduction of constraints with regard to the production and preservation of all housing.

A detailed listing of policies in the City's General Plan Housing Element that are applicable to the Project is provided in Table 49, which starts on page 503. Table 49 also compares the Project features to the development anticipated in the policies, and evaluates Project consistency with the policies and visioning principles.

(c) Central City Community Plan

In the City of Los Angeles, 35 Community Plans comprise the Land Use Element of the General Plan. As such, the Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The proposed Project is located within the boundaries of the Central City Community Plan (Plan), which was adopted January 8, 2003. The Plan's purpose is to promote, "... an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community." Land uses in the Plan area are primarily dedicated to governmental, financial, and industrial uses, and therefore, this area has a smaller residential population than might be expected as compared to the rest of the City. Nevertheless, the number of dwelling units is increasing due to new development as well as the conversion of existing vacant and industrial buildings to residential uses. A detailed listing of Plan policies that are applicable to the Project is provided in Table 6 on page 180, in Section IV.A, Land Use. Table 5 also compares the Project features to the development anticipated in the policies, and evaluates Project consistency with the Policies.

¹¹⁴ *Housing Element, City of Los Angeles General Plan. Adopted December 18, 2001.*

b. Existing Conditions**(1) Population and Housing Characteristics**

The Project site is located within the Central City Community Plan (“Community Plan”) Area of the City of Los Angeles; and at a more localized area within Census Tract 207500. The City of Los Angeles has compiled existing condition information for population and housing, based upon Census data, and City estimating procedures. Table 42 on page 495, provides an overview of the population and household totals for 2000 and 2004. As indicated, in 2004, approximately 27,088 people lived within the Central City Community Plan area, approximately 0.6 % of the City’s total population. Of the 27,088 persons, approximately 3,812 persons or approximately 14% lived within Census Tract 207500. In addition, there were approximately 12,000 households in the Community Plan area, or approximately 0.9 % of the City total.

Table 43 on page 496 provides demographic data on the existing population. As indicated in Table 43, the Community Plan Area has a diverse mix of ages, educational attainment, and ethnicities. Similar to the City of Los Angeles, ages 15 to 64 are the highest percentage of the population. The Community Plan Area’s lowest percentage is the 14 and under age cohort whereas, 65 and older is the lowest age cohort in the City of Los Angeles. This difference indicates a fewer number of families within the Community Plan area in comparison to the percentage within the City of Los Angeles. In terms of education, individuals within the Community Plan Area exhibit a slightly lower educational attainment than the City of Los Angeles, with an increase in the percentage of residents who gained less than a high school diploma and a decrease in the residents who gained a college bachelor degree or higher . The diversity of ethnicities represented throughout the City of Los Angeles are also found within the Community Plan Area, although proportionately different. Specifically, the Asian population has a higher percentage and the white population has a lower percentage in the Community Plan Area in comparison to the overall City of Los Angeles.

Tables 44 and 45 on page 497, provide information on the characteristics of the housing units and households as described in the 2000 Census. As shown in these tables, the Project area is comprised of mostly rental units, with 94.9% rentals in the Community Plan area as opposed to 63% Citywide. Within the Census Tract, 88.5% were renter occupied. Further, the household sizes were smaller than the Citywide average of 2.72. Household size in the Community Plan Area was 1.54 and in the Census Tract it was 1.37.

(2) Population, Housing and Employment Projections

The most current SCAG population, housing, and employment forecasts are those developed in support of the adopted 2004 RTP. Besides providing the adopted forecasts that are

Table 42**Summary of Population and Housing**

	Population		Occupied Housing Units	
	2000	2004	2000	2004
Census Tract 207500	4,098	4,230	2,988	2,970
Central City Community Plan Area	25,207	27088	11,713	12,000
City of Los Angeles	3,694,820	3,926,000	1,277,473	1,291,000

Source: City of Los Angeles Website

used for implementation of SCAG policies, SCAG also provides small area data for advisory purposes. The small area data is portrayed for Census Tracts, which in turn is compiled for Cities and may also be aggregated for unique areas such as the City's Community Plan areas. The SCAG projections for the SCAG region, City of Los Angeles Subregion, Central City Community Plan Area, and Census Tract 207500 are shown in Table 46 on page 498.

As indicated in Table 46, on page 498, the population in 2006 is forecasted to be 4,061,195 for the Subregion, 29,147 for the Community Plan Area, and 4,934 within the Project's Census Tract. The forecasted population growth between 2006 and 2015 is 176,692 persons, or 4.4% in the Subregion, 403, or 1.4% in the Community Plan area and 68, or 1.38% in the Project's Census tract. This contrasts with a forecasted increase in population of 11.5% within the entire SCAG region.

The number of households in 2006 is forecasted at 1,343,306 in the Subregion, 12,795 in the Community Plan area and 3,245 in the Project's Census Tract Area. The forecasted household growth between 2006 and 2015 is projected as 117,374, or 8.74% in the Subregion, 1,120, or 8.0% in the Community Plan area, and 272, or 8.4% in the Project's Census Tract. This contrasts with a projected increase in housing for the entire SCAG region of 14.1%

Employment in 2006 is forecasted at 1,873,130 jobs for the Subregion, 222,768 jobs for the Community Plan Area, and 33,147 jobs for the Project's Census Tract. The forecasted employment growth between 2006 and 2015 is for 222,628, or 11.89% in the Subregion, 8,668, or 3.8% in the Community Plan area and 1,117, or 3.37% in the Project's Census Tract. This contrasts with a projected increase in jobs of 16.91% for the entire SCAG region.

The employment and household data presented in Table 46 can be used as a basis for developing a measure of the jobs to housing ratio for the various geographies. The jobs/housing ratio is an indicator of the distribution of workers and residents. As indicated in Table 46, the ratio of employees to households in 2006 within the SCAG region is estimated to be

Table 43

Population Characteristics

Age as Percent of Total Population

Geographic Zone	Average			
	Median Age	14 & Under	15-64	65 & Over
Census Tract 207500	48.5	2.5	63.2	34.3
Community Plan Area	39.0	13.0	70.0	17.0
City of Los Angeles	31.6	22.7	67.6	9.7

Education as Percent of Total Population

Geographic Zone	Less Than	High School	Some	College	Graduate
	High School Graduate	High School Graduate	College	Graduate	Level Education
Census Tract 207500	18.49	11.19	15.60	30.02	24.70
Community Plan Area	46.44	19.06	15.02	13.08	6.40
City of Los Angeles	33.36	17.41	18.40	21.77	9.07

Ethnicity as Percent of Total Population

Geographic Zone	Non-Hispanic							Hispanic/ Latino
	Asian	Afro-American	Native American	Pacific Islander	White, Nonhispanic	Other Race	Multiracial	
Census Tract 207500	52.85	6.80	0.16	0.04	26.54	0.28	2.36	10.90
Community Plan Area	22.88	23.49	0.68	0.14	16.82	0.14	2.19	33.63
City of Los Angeles	10.00	11.2	0.08	0.20	46.90	25.70	5.20	46.53

Source: PCR Services Corporation based on the City's 2000 Census Profile.:

Table 44

Housing Stock – Occupancy Profile

	Percent of Total Housing Stock ^a					
	Housing Tenure		Occupancy Status		Total	
	Owner	Renter	Occupied	Vacant	Housing Units	Households
Census Tract	11.5	88.5	92.2	7.8	3,240	2,988
Community Plan	5.1	94.9	114.6	11.7	13,269	11,713
City of Los Angeles	37.0	63.0	99.3	4.7	1,337,706	1,277,473

^a Based on 2000 Census data.

Source: PCR Services Corporation based on the City's 2000 Census Profile.

Table 45

Total Households and Household Size

	Total Households	Average Size	Percent of Total Households with Number of Persons			
			1	2	3	4+
Census Tract 207500	2,988.00	1.37	69.2	26.2	3.6	1.0
Community Plan	11,712.00	1.54	71.8	17.4	4.4	6.4
City of Los Angeles	1,275,412.00	2.72	28.5	26.6	15.0	29.9

Source: PCR Services Corporation based on 2000 Census.

1.35 employees per household. When taking into account a vacancy rate of 5.9%, the ratio of employees to housing units in 2006 is estimated to be 1.27. When the regional rate occurs equally throughout SCAG's subregions, the opportunity is the greatest for people to live close to where they work, thus reducing vehicle miles traveled. To the extent that ratios vary, communities are said to be jobs rich or housing rich and reflect employment centers and residential communities respectively. The jobs/housing ratio is 16.4 for the Community Plan Area and 9.7 for the Project's Census Tract. This reflects the Project areas status as one of the region's largest employment centers.

Table 46**Population, Households and Employment**

POPULATION			Population Growth	
Geographic Zone	2006^a	2015^a	2006-2015	Percentage
Census Tract 207500	4,934	5,002	68	1.38
Central City Community Plan Area	29,147	29,550	403	1.36
City of Los Angeles Subregion (SCAG)	4,061,195	4,237,887	176,692	4.35
SCAG Regional Area Total	20,233,087	22,561,643	2,328,556	11.51
HOUSEHOLDS			Household Growth	
Geographic Zone	2006^a	2015^a	2006-2015	Percentage
Census Tract 207500	3,245	3,517	272	8.38
Central City Community Plan Area	12,795	13,915	1,120	8.05
City of Los Angeles Subregion (SCAG)	1,343,306	1,460,680	117,374	8.74
SCAG Regional Area Total	6,360,344	7,259,762	899,416	14.14
EMPLOYMENT			Employment Growth	
Geographic Zone	2006^a	2015^a	2006-2015	Percentage
Census Tract 207500	33,147	34,264	1,117	3.37
Central City Community Plan Area	222,768	231,436	8,668	3.75
City of Los Angeles Subregion (SCAG)	1,873,130	2,095,758	222,628	11.89
SCAG Regional Area Total	8,586,266	10,038,316	1,452,050	16.91

^a Estimates/projections are taken from SCAG 2004 RTP data. 2006 estimates are based on an interpolation of the 2005 and 2010 projections. The projections for the Community Plan area are based on the Census Tract data in the RTP, but have been aggregated to the Community Plan area.

Source: SCAG 2004 RTP projections, PCR Services Corporation.

3. PROJECT IMPACTS

a. Methodology

The analysis of impacts on population and housing addresses the Project's consistency with population and housing projections and consistency with Plan policies. The portion of the analysis that addresses projections provides estimates of the Project's population, housing and employment characteristics and compares those estimates to projections provided in SCAG's 2004 RTP. The comparison reflects the Project's anticipated population, housing and employment as a percentage of SCAG's projected growth for each of the categories between 2006 and 2015. The comparison is made for the Project's census tract, Community Plan area and the City Los Angeles Subregion. Of the comparisons, those related to the subregion reflect a comparison to adopted policy forecasts, and therefore, serve as a basis for identifying significant

impacts. The remaining comparisons are provided for informational purposes, and to support conclusions regarding consistency with Policies pertaining to population and housing.

The portion of the analysis that addresses plan consistency considers the Policies of both the City of Los Angeles and SCAG. Los Angeles' policies are found in the City's General Plan Framework, Central City Community Plan, and General Plan Housing Element; SCAG policies are found in the Regional Comprehensive Plan and Guide (RCPG) as well as the related 2004 Regional Transportation Plan (RTP), and Compass Vision Report. The consistency analysis identifies applicable policies, and compares the Project's features against the types of development anticipated in the policies. An analysis of Project consistency with these Plans, except for the Housing Element, are provided in Section IV.A, Land Use.

Implementation of the Civic Park and the Grand Avenue Streetscape improvements would have no affect on population and housing and as a result do not require further analysis.

b. Thresholds of Significance

Based on factors set forth in the City of Los Angeles *CEQA Thresholds Guide* (1998), the proposed Project would have a significant impact on population and housing if:

- The Project would cause population or housing growth in SCAG's City of Los Angeles subregion to exceed SCAG's 2015 projections.
- The Project would cause growth that is not compatible with adopted population and housing policies, including jobs/housing balance, as set forth in the Central City Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide (RCPG).

c. Impact Analysis

(1) Project with County Office Building Option

(a) Construction

It is estimated that several thousand construction workers would be employed during the construction of the Project. Employees in the construction industry work at different locations throughout the region depending upon where the construction is located. These employees do not typically relocate closer to a construction site as the length of time spent at a specific job site is limited. Additionally, all five parcels proposed for development are currently utilized as vehicle parking lots, providing a limited number of jobs. These few jobs would be affected

during construction activities, but Project operations would support on-going opportunities for parking lot employment, upon completion of construction. Project construction would not involve the relocation of any residences. Therefore, impacts to housing and population related to construction workers would be less than significant.

(b) Operation

(i) Impacts on Projected Growth

The Project with County Office Building Option includes up to 2,060 residential units, as well as 449,000 sq.ft. of retail uses, 275 hotel rooms and 681,000 sq.ft. of county office space. Of the 2,060 residential units, 412 (20%) would be affordable units. The housing would include both condominium units and rental units, with a variety of 1-bedroom, 2-bedroom and 3-bedroom unit sizes.

The new development would support population, housing and employment increases within the Project geographies considered in this analysis: the City of Los Angeles Subregion, the Community Plan area, and the Project's Census Tract, Census Tract No. 207500. As shown in Table 47 on page 501, the Project with County Office Building Option is forecasted to have a residential population of 2,925 and 3,930 employees. The increases that would occur are compared to projected increases in population, housing and employment during the 2006 through 2015 time frame in Table 48 on page 502. The population, housing and employment growth projections are from SCAG's 2004 RTP.

The growth projections for the City of Los Angeles Subregion represent adopted SCAG projections developed for implementing and monitoring the effects of SCAG policies. The projected growth that is forecasted to occur in the City of Los Angeles Subregion between 2006 and 2015 is as follows: 176,692 persons, 117,374 households, and 222,628 employees. The additional population of 2,925 persons associated with the Project with County Office Building Option would comprise 1.7% of the expected growth. The 2,060 households would represent 1.8% of the projected household growth; and the 3,930 employees would represent 1.8% of the projected employment growth. Thus, the contribution to growth associated with the Project with County Office Building Option would be a small part of the expected growth and would not cause the expected growth to be exceeded. Therefore, the impacts on growth would be less than significant.

Table 47

**Project with County Office Building Option
Population and Employment**

Population

Total Housing Units	2,060
Average Household Size	1.42 ^a
Total Population ^b	2,925

	Proposed	Factor	Total Employment
Employment			
Retail	449,000 sq.ft.	500 sq.ft./employee ^c	898
County Office Building	681,000 sq.ft.	250 sq.ft./employee ^c	2,724
Hotel	275 rooms	0.9 employees/room ^c	248
Hotel Meeting Space	15,000 sq.ft.	500 sq.ft./employee ^d	30
Park	16 acres	0.65 employees/acre ^e	10
Park Restaurant	10,000 sq.ft.	500 sq.ft./employee ^d	<u>20</u>
Total			3,930

^a Household size is based on the 2004 household size for the Project's Census Tract.

^b Assumes 100% occupancy.

^c Based on data provided in the Institute of Transportation Engineers .Seventh Edition, 2003.

^d Factor is assumed to be the same as retail since use specific information is not available from the ITE.

^e Factor is based on data presented in the SCAG Employment Density Study, Summary Report, October 31, 2001.

Source: PCR Services Corporation ,2006.

At the same time, it may be noted that the population and housing growth would exceed SCAG advisory projections for population and housing within the Community Plan area and the Project's Census Tract. The population growth would be over seven times what is projected within the Community Plan area during the 2006 to 2015 time period, and the housing growth would be 1.8 times of that projected. These increases over the local advisory projections indicate that the Project would be increasing housing and population in the jobs/rich downtown area at a faster rate than SCAG anticipated; and therefore, improvements in the job/housing ratio at the local area can be achieved to a much greater level than anticipated. Further, the Project's housing and population growth support the objectives of the Downtown Strategic Plan to enhance the importance of the downtown area as a residential center and government employee center. Thus, the Project's growth would be considered a beneficial impact of the Project.

Table 48**Comparison of Project with County Office Building Option to SCAG Projections**

POPULATION		Population Growth	
Geographic Zone	2006-2015 ^a	Project Increase	Percent of Expected Increase
Census Tract 207500	68	2,925	4,301.5 %
Community Plan Area	403	2,925	725.8 %
City of Los Angeles Subregion (SCAG)	176,692	2,925	1.7 %
HOUSEHOLDS		Household Growth	
Geographic Zone	2006-2015 ^a	Project Increase	Percent of Expected Increase
Census Tract 207500	272	2,060	757.4 %
Community Plan Area	1,120	2,060	183.9 %
Los Angeles City subregion (SCAG)	117,374	2,060	1.8 %
EMPLOYMENT		Employment Growth	
Geographic Zone	2006-2015 ^a	Project Increase	Percent of Expected Increase
Census Tract 207500	1,117	3,930	351.8 %
Community Plan Area	8,668	3,930	45.3 %
City of Los Angeles Subregion (SCAG)	222,628	3,930	1.8 %

^a Based on data presented in Table 46.

Source: SCAG 2004 RTP projections; PCR Services Corporation.

(ii) Consistency with Adopted Policies

Numerous population and housing policies are applicable to the proposed Project. These policies are found within SCAG documents (RCPG, RTP and Compass Vision Report) and City documents (General Plan Framework, General Plan Housing Element and the Community Plan). Detailed listings of these policies for all of the documents, except the City's General Plan Housing Element, are provided in the analysis of Plan Consistency in Section IV.A, Land Use. Those listings are accompanied by a comparison of the Project's features to the policies and an analysis of the Project's consistency with the policies. The policies for the General Plan Housing Element are shown in Table 49 on page 503, and likewise compared to the Project's features and analyzed for consistency with the Policies.

Table 49

Comparison of the Project to the General Plan Housing Element

Policy	Analysis of Project Consistency
Policy 1.1.8 : Encourage and support public and private programs to increase the availability of affordable rental housing for all city residents.	Consistent. The Project with County Office Building Option would provide 412 new affordable housing units. The units would be implemented through the Grand Avenue Authority, which is an independent public agency, established through a joint powers agreement between the Community Redevelopment Agency of the City of Los Angeles and the County of Los Angeles.
Policy 1.1.9: Encourage a broad range of services to residents in publicly assisted housing units.	Consistent. The Project with County Office Building Option would provide 412 new affordable housing units. These units would be located in the downtown area with nearby access to an extensive range of goods and services, as well as public serving facilities. The Project's retail and Park components would serve on-site and off-site populations that are residing in affordable units.
Policy 1.1.10: Support retention of the long-term affordability of publicly assisted housing.	Consistent. The Project with County Office Building Option's 412 affordable units would be available as affordable housing on a long-term basis.
Policy 2.1.3: Encourage mixed use development which provides for activity and natural surveillance after commercial business hours.	Consistent. The Project would include a mix of residential, retail, office, and park uses within the Project area and would add a sizable population to the downtown area, thus enhancing evening activity.
Policy 2.1.4: Enhance livability of neighborhoods by upgrading the quality of development and improving the quality of the public realm, including streets, streetscape, and landscaping to provide shade and scale.	Consistent. The Project would redevelop and revitalize primarily underdeveloped city blocks and a public park located in downtown Los Angeles. The Project includes a 16-acre Civic Park and Grand Avenue streetscape enhancements extending from Fifth Street to Cesar E. Chavez Avenue.
Policy 2.1.7: Establish through the Framework Long-Range Land Use Diagram, community plans, and other implementation tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	Consistent. The Project would provide a high density, high-rise, infill, mixed-use Project that would add to the diversity of the downtown area, and support the area's development per its Downtown Center designation on the Long Range Land Use Diagram, Metro Area.
Policy 2.3.1: Encourage and plan for high intensity residential and commercial development in centers, districts and along transit Corridors, as designated in the Community Plans and the Transportation Element of the General Plan, and provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled in order to mitigate traffic congestion, air pollution, and urban sprawl.	Consistent. The Project would provide a high density, high-rise, infill, mixed-use Project. The Project site is in close proximity to transportation corridors, including the existing Harbor and Hollywood Freeways, and other transit infrastructure. As discussed in Subsection 2.c.(1)(b)(i) above, the Project with County Office Building Option would locate 2,060 new housing units in the jobs rich downtown area, enhancing the area's job/housing balance.
Policy 2.3.3: Encourage the development of new projects that are accessible to public transportation and services consistent with the community plans. Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate	Consistent. As described for Policy 2.3.1, the Project would be located in area that lies adjacent to major transportation corridors. The Project area serves as a hub for public transit systems, and includes a considerable amount of pedestrian opportunity and

Table 49 (Continued)

Comparison of the Project to the General Plan Housing Element

Policy	Analysis of Project Consistency
locations.	activity.
Policy 3.1.6: Take an active role in broadening the accessibility and availability of housing to all City residents, with particular attention to the special Needs of the homeless, very low, and low income households, disability, elderly, large households, families with children, single parent households, and persons living with AIDS.	Consistent. The Project with County Office Building Option's 412 affordable units would be located in an area suffering from a lack of sufficient housing. The housing units would be available to the various populations cited.
Policy 4.1.2: Cooperate with public and private entities in seeking innovative funding sources and implementing programs to produce affordable and special needs housing.	Consistent. Project development includes between 412 and 532 affordable housing units. The Project is a result of a cooperative arrangement between public and private entities that is memorialized in the Project's DDA.
Policy 4.1.3: Utilize mixed use as an implementation tool to produce more affordable housing.	Consistent. The Project is a mixed-use Project. The Project with County Office Building Option contains 2,060 residential units, of which 412 are affordable, 449,000 sq.ft. of retail/service uses, up to 275 hotel rooms, and 681,000 sq.ft. of County office building.

As indicated in the various policy analysis tables, the Project with County Office Building Option is consistent with all of the identified policies. Further, this Option is supportive of the goals and objectives that are to be served through the policies. The conclusions indicated in the policy analysis tables are summarized as follows:

- The Project with County Office Building Option would provide 2,060 housing units, inclusive of 412 affordable units. The housing units would include a range of sizes. Provision of these units would support policies intended to improve the availability and range of the City's housing stock.
- The Project would place the new housing in the downtown area. It would add a substantial number of housing units to a jobs rich area, and enhance the connectivity between housing and employment opportunities within the Community Plan area, thus serving the SCAG Region and City of Los Angeles Subregion. SCAG policies encourage such opportunities as a means of reducing vehicle miles traveled and resultant air quality and noise impacts that result from vehicular traffic.
- The Project would place new housing at the center of the City and support policies that encourage housing development along transportation corridors with access to public transportation, and availability of goods and services, by pedestrian travel. The Project would provide commercial activities that would support an estimated 3,930 employees. In so-doing, the Project would support policies that encourage

infill, mixed-use cluster development that would provide on-site services for the Project population and support of the downtown center.

Therefore, development associated with the Project with County Office Building Option would be consistent with the population and housing policies, including jobs/housing balance, as set forth in the Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide. Thus, impacts of the Project with County Office Building Option with regard to plan consistency would be less than significant.

(2) Project with Additional Residential Development Option

(a) Construction

The Project with Additional Residential Development Option would increase the amount of housing space while eliminating the County office building space. The construction program would be substantially similar to that of the Project with County Office Building Option and, like that Option would generate temporary employment opportunities for several thousand construction workers during the construction of the Project. Impacts to housing and population related to construction workers, as is the case with the Project with County Office Building Option, would be less than significant for the same reasons.

(b) Operation

(i) Impacts on Projected Growth

The Project with Additional Residential Development Option would, like the Project with County Office Building Option include a mix of housing/residential uses and employee generating uses. However, the number of residential units would be increased, and the County office building space would be removed from the Project. The resulting development would include 2,660 residential units, of which 532 would be affordable units. This is an increase of 600 residential units in total, and an increase of 120 affordable units. The residential population and employment that would be generated under this option are shown in Table 50 on page 506 . A comparison of the increases in population, housing and employment under the Project with Residential Development Option and SCAG's growth projections for the 2006 through 2015 time frame is shown in Table 51 on page 507.

By increasing the number of housing units and residential population, the Project with Additional Residential Development Option would increase the Project's housing and population contribution to SCAG's adopted City of Los Angeles Subregion projections. The increase in

Table 50

**Project with Additional Residential Development Option
Population and Employment**

Population

Total Housing Units	2,660
Average Household Size	1.42 ^a
Total Population ^b	3,777

	<u>Proposed</u>	<u>Factor^c</u>	<u>Total Employment</u>
Employment			
Retail	449,000 sq.ft.	500 sq.ft./employee ^c	898
County Office Building	0 sq.ft.	250 sq.ft./employee ^c	0
Hotel	275 rooms	.9 employees/room ^c	248
Hotel Meeting Space	15,000 sq.ft.	500 sq.ft./employee ^d	30
Park	16 acres	0.65 employees/acre ^e	<u>10</u>
Park Restaurant	10,000 sq.ft.	500 sq.ft./employee ^d	<u>20</u>
Total			1,206

^a Household size is based on the 2004 household size for the Project's Census Tract, as estimated by the City of Los Angeles Planning Department on the City's Statistical Information Web page.

^b Assumes 100% occupancy.

^c Based on data provided in the Institute of Transportation Engineers, Sixth Edition, 1997.

^d Based on data provided in the Institute of Transportation Engineers .Seventh Edition, 2003.

^e Factor is assumed to be the same as retail since use specific information is not available from the ITE.

^f Factor is based on data presented in the SCAG Employment Density Study, Summary Report, October 31, 2001.

Source: PCR Services Corporation, 2006.

housing within the City of Los Angeles Subregion would be 2.3% in contrast to the Project with County Office Building Option's 1.8%. The increase in population in the City of Los Angeles Subregion would be 2.1% in contrast to the Project with County Office Building Option's 1.7%; and the number of employees would decrease from 1.8% to 0.5% of the projected growth within the City of Los Angeles Subregion. The growth in housing, population and employment associated with the Project with Additional Residential Development Option would still comprise a small part of the expected growth and would not cause the expected growth to be exceeded. Therefore, the impacts of the Project with Additional Residential Development Option would be less than significant.

At the Community Plan level, the greater amounts of housing and population would exceed the projected values by even greater amounts than the Project with County Office Building Option. The increase in housing would be 238% of the forecasted increase in contrast to the Project with County Office Building Option's 184%. The increase in population would be over nine times the forecasted increase in contrast to the Project with County Office Building

Table 51**Comparison of Project with Additional Residential Development Option to SCAG Projections**

POPULATION	Population Growth		
	Geographic Zone	2006-2015^a	Project Increase
Census Tract 207500	68	3,777	5,554.4%
Community Plan Area	403	3,777	937.2%
City of Los Angeles Subregion (SCAG)	176,692	3,777	2.1%
HOUSEHOLDS	Household Growth		
Geographic Zone	2006-2015^a	Project Increase	Percent of Expected Increase
Census Tract 207500	272	2,660	977.4%
Community Plan Area	1,120	2,660	237.5%
Los Angeles City subregion (SCAG)	117,374	2,660	2.3%
EMPLOYMENT	Employment Growth		
Geographic Zone	2006-2015^a	Project Increase	Percent of Expected Increase
Census Tract 207500	1,117	1,206	108.0%
Community Plan Area	8,668	1,206	13.9%
City of Los Angeles Subregion (SCAG)	222,628	1,206	0.5%

^a Based on data presented in Table 46.

Source: SCAG 2004 RTP projections; PCR Services Corporation, April 2006.

Option's increase of over seven times the incremental growth forecast. Again, this would be viewed as an additional benefit. These increases over the local advisory projections indicate that the Project would be increasing housing and population in the jobs/rich downtown area at a faster rate than SCAG anticipated; and therefore, improvements in the job/housing ratio at the local area can be reduced to a greater level than anticipated.

(ii) Consistency with Adopted Policies

The Project with Additional Residential Development Option would provide 2,660 housing units, inclusive of 532 affordable units. This is 600 more units and 120 more affordable units than the Project with County Office Building Option. The additional units would provide greater support to those policies intended to increase the availability and range of housing stock. As is the case with the Project with County Office Building Option, these units would be located in the downtown area, thus adding a substantial number of housing units to a jobs rich area, and enhancing the connectivity between housing and employment opportunities within the

Community Plan area, thus serving the SCAG Region as well as the City of Los Angeles Subregion. Further, the additional housing at the Project site would add further support to policies intended to encourage the placement of housing along transportation corridors with access to public transportation, and the availability of goods and services, by pedestrian travel.

The Project with Additional Residential Development Option would reduce the number of employees from 3,930 to 1,206. This reduction would further enhance the jobs/housing balance within the City of Los Angeles Subregion and the Community Plan area. Therefore, the reduction would not be considered adverse. As is the case with the Project with County Office Building Option, the Project with Additional Residential Development Option would be consistent with the population and housing policies, including jobs/housing balance, as set forth in the Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide. Thus, impacts regarding plan consistency would be less than significant.

4. CUMULATIVE IMPACTS

Additional growth in population, housing and employment is expected to occur due to the development of the 93 related projects identified in Section III.B of this Draft EIR. The related projects would create a considerable number of new housing units in addition to that of the Project and a considerable amount of commercial, office and community/government use as well as parking and warehouse activities that would generate new employment. The development associated with the related projects is summarized in Table 52 on page 509, which also provides calculations of the cumulative housing, residential and employment growth.

The related projects and Project growth within the Community Plan Area would result in a cumulative increase in construction employment. As stated above, because of the regional nature of the construction industry, these construction job estimates are appropriately evaluated on a regional basis. Specifically, employees in the construction industry work at different locations throughout the region depending upon where the construction is located. These employees do not typically relocate closer to a construction site as the length of time spent at a specific job site is limited. Therefore, cumulative impacts to housing and population related to construction workers would be less than significant.

As indicated in Table 52, the related projects include 17,762 housing units that would generate an estimated population of 28,952. The various employee generating uses would support an estimated 62,370 employees. When combined with the development from the Project

Table 52

Estimate of Residents and Employees Generated By the Related Projects

Use Type	Amount of Development	Units	Generation Rate ^a	Total
Residential Population				
Total Related Projects	17,762	d.u.	1.63	28,952
Project with County Office Building Option	2,060	d.u.	1.42	2,925
Total Cumulative Population	19,822			31,877
Total Related Projects	17,762	d.u.	1.63	28,952
Project with Additional Residential Option	2,660	d.u.	1.42	3,777
Total Cumulative Population	20,422	d.u.		32,729
Employee Population				
Commercial				
Retail	3,084,447	square feet	500	6,169
Office	11,677,301	square feet	250	46,709
Hotel	2,550	rooms	1.1	2,318
Theater	12,200	seats	200	61
Total Commercial				55,257
Schools				
Kindergarten - High School	6,779	students	13	521
Performing Arts School ^b	128,000	square feet	1,000	128
Total School				649
Child Care	45	children	8	6
Community Facilities	296,800	square feet	500	594
Medical/Health Offices	84,075	square feet	250	336
Municipal/Civic Facilities				
Metro Jail	512	beds	10	51
Offices	2,940	employees		2,940
Courtrooms/Judges/Satellite Library ^c	1,016,000	square feet	500	820
Total Municipal Facilities				3,811
Parking	11,366	stalls	500	23
Warehouse	640,000	square feet	1,518	422
Park	457380	square feet	7,600	60
Total - Related Projects				61,158
Project with County Office				3,930

Table 52 (Continued)

Estimate of Cumulative Populations

Use Type	Amount of Development	Units	Generation Rate ^a	Total
Building Option				
Total Cumulative Employees With Project				65,088
Total - Related Projects				61,158
Project with Additional Residential Option				1,206
Total Cumulative Employees With Project with Additional Residential Option				62,364

^a Generation rates for residential population reflect residents per household. The rates for employees reflect the amount of the unit of measurement required to generate 1 employee.

^b Assumes 2,000 square feet for each of 64 classrooms.

^c Assumes 2,000 square feet for each of 41 courtrooms and assumes 500 square feet for each of 40 Judges' chambers.

Source: PCR Services Corporation, April 2006.

with County Office Building Option the estimated growth would be 31,877 residents, 19,822 housing units and 66,300 employees. This growth is compared to SCAG's estimated 2006 through 2015 growth for the City of Los Angeles Subregion in Table 53 on page 511. As indicated, the cumulative development would comprise approximately 18.0% of the projected population, 16.9% of the projected households and 29.8% of the projected employment. While this is a notable amount of development, it is substantially below the projections. Therefore, the cumulative development associated with the Project with County Office Building Option would not exceed the SCAG 2004 RTP projections and would be less than significant. As also indicated in Table 53, the cumulative growth associated with the Project with Additional Residential Development Option would be somewhat similar, and the conclusions regarding cumulative growth would be similarly less than significant.

The related projects include a large range of development types that are consistent with future development of the downtown area, as a dense activity center with access to freeways, and public transportation. The development would support redevelopment within several Redevelopment Project Areas (e.g., Bunker Hill, Central Business District, Central Industrial, Chinatown, City Center and Little Tokyo). It would also enhance the vibrancy of the downtown area, and in so doing continue to realize the potential of downtown Los Angeles as a 24-hour vibrant Urban Center.

Table 53**Comparison of Cumulative Development to SCAG Subregion Projections**

POPULATION	Population Growth		
	Development Option	2006-2015	Cumulative Increase
Project with County Office Building Option	176,692	31,877	18.0 %
Project with Additional Residential Development Option	176,692	32,729	18.5 %
HOUSEHOLDS	Household Growth		
Geographic Zone	2006-2015	Cumulative Increase	Percent of Expected Increase
Project with County Office Building Option	117,374	19,822	16.9 %
Project with Additional Residential Development Option	117,374	20,422	17.4 %
EMPLOYMENT	Employment Growth		
Geographic Zone	2006-2015	Cumulative Increase	Percent of Expected Increase
Project with County Office Building Option	222,628	66,300	29.8 %
Project with Additional Residential Development Option	222,628	63,576	28.6 %

Source: SCAG 2004 RTP projections; PCR Services Corporation.

The additional 17,762 housing units associated with the related projects would support policies intended to increase the availability of housing stock generally; and housing in job/rich, high density areas in particular. The cumulative development inclusive of the Project with County Office Building Option would, in itself, have a jobs/housing ratio of 3.28 (assuming 100% occupancy). While the ratio is greater than the regional average of 1.24, it is substantially less than the existing levels in the downtown area, which vary by geography, but are as high as the Community Plan area's 15.9. Therefore, cumulative development would lead to the reversal of previous trends and support the type of downtown environment envisioned in all of the applicable plans for the area.

Individual related projects of a size that could substantially affect population and housing would be subject to CEQA review, and evaluation per existing plans and policies. The proposed Project would not have a significant impact with regard to consistency with adopted plans and policies. The Project is not expected to contribute to a cumulative condition causing

inconsistencies with existing plans and policies, and therefore cumulative impacts with regard to such consistency would be less than significant.

5. MITIGATION MEASURES

The Project would result in no significant impacts on population, housing and employment, and no mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would not exceed SCAG's adopted projections for the City of Los Angeles Subregion. The Project would be consistent with adopted policies, including job/housing balance, as set forth in the Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide. Therefore, the Project would not result in any significant environmental impacts to housing or population.

IV. ENVIRONMENTAL IMPACT ANALYSIS

F. AIR QUALITY

1. INTRODUCTION

This section addresses the air emissions generated by the construction and operation of the proposed Project. The analysis also addresses the consistency of the proposed Project with the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan, and the City of Los Angeles' General Plan. The analysis of Project-generated air emissions focuses on whether the proposed Project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold.

2. SETTING

a. Regulatory Framework

A number of statutes, regulations, plans, and policies have been adopted that address air quality issues. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of the Federal Clean Air Act (CAA). Some portions of the CAA (e.g., certain mobile source and other requirements) are implemented directly by the USEPA. Other portions of the CAA (e.g., stationary source requirements) are implemented by state, regional and local agencies. The applicability of regional and local provisions is dependant on what agencies have jurisdiction in regard to the location and boundary of an emission source.

(1) Federal Level

(a) United States Environmental Protection Agency (USEPA)

The USEPA administers the CAA and other Federal air quality legislation. As a regulatory agency, USEPA's principal functions include the following: setting National Ambient Air Quality Standards (NAAQS); preparing guidance for and approval of State Implementation Plans (SIPs) to attain or maintain these standards; establishing federal emission limits for major sources of air emissions; conducting research and developing standard methods for measuring air emissions; inspecting and monitoring emission sources; enforcing Federal air quality laws, and promulgating new regulations, and providing financial and technical support for air quality research and development programs. The USEPA also administers Federal conformity rules and regulations.

(b) Federal Clean Air Act

The CAA was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. The CAA establishes federal air quality standards, or the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement a SIP for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 Amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA that are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I requirements are implemented for the purpose of attaining NAAQS for the following criteria pollutants: (1) ozone (O₃); (2) nitrogen oxides (NO_x); (3) sulfur dioxide (SO₂); (4) particulate matter (PM₁₀ and PM_{2.5}); (5) carbon monoxide (CO); and (6) lead (Pb). The NAAQS were amended in July 1997 to include the 8-hour standard for O₃ and a NAAQS for PM_{2.5}. Table 54 on pages 515 and 516 shows the NAAQS currently in effect for each criteria pollutant.

The Project area is located within the South Coast Air Basin (Basin), an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin has been designated as a non-attainment area as the area does not meet NAAQS for certain pollutants regulated under the CAA. The Basin fails to meet national standards for O₃ (for both the 1-hour and 8-hour standards), PM₁₀, PM_{2.5}, and CO, and therefore is considered a Federal “non-attainment” area for these pollutants. The CAA sets certain deadlines for meeting the NAAQS within the Basin including: (1) 1-hour O₃ by the year 2010; (2) 8-hour O₃ by the year 2021; (3) PM₁₀ by the year 2006; and (4) PM_{2.5} by the year 2015. Nonattainment designations are categorized into seven levels of severity: (1) basic, (2) marginal, (3) moderate, (4) serious, (5) severe-15, (6) severe-17,¹¹⁵ and (7) extreme. Table 55 on page 517 provides the attainment status for each criteria pollutant.

¹¹⁵ The “-15” and “-17” designations reflect the number of years within which attainment must be achieved.

Table 54
Ambient Air Quality Standards^a

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O₃)^b	1 hour	0.09 ppm	0.12 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Motor vehicles.
	8 hours	0.07 ppm ^c	0.08 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO₂)	Annual Arithmetic Mean	—	0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.25 ppm	—		
Sulfur Dioxide (SO₂)	Annual Arithmetic Mean	—	0.03 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	—		
	24 hours	0.04 ppm	0.14 ppm		
Particulate Matter (PM₁₀)	24 Hours	50 µg/m ³	150 µg/m ³	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	50 µg/m ³		
Particulate Matter (PM_{2.5})^{c,d}	24 Hours	—	65 µg/m ³	Increases respiratory disease, lung damage, cancer, premature death; reduced visibility; surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO _x , SO _x , organics).
	Annual Arithmetic Mean	12 µg/m ³	15 µg/m ³		

Table 54 (Continued)

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Lead	Monthly	1.5 ug/m ³	—	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	Lead smelters, battery manufacturing & recycling facilities.
	Quarterly	—	1.5 ug/m ³		
Sulfates (SO ₄)	24 hours	25 ug/m ³	—	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Coal or oil burning power plants and industries, refineries, diesel engines.

ppm = parts per million and $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

- ^a Ambient air quality standards are set at levels that provide a reasonable margin of safety and protect the health of the most sensitive individual in the population.
- ^b Ozone is formed when NO_x and VOCs react in the presence of sunlight. There are no air quality standards for VOC. However, VOCs are recognized as pollutants of concern as they are a precursor to the formation of ozone
- ^c This concentration for ozone and PM₁₀ was approved by the Air Resources Board on April 28, 2005 and is anticipated to become effective in early 2006.
- ^d A Federal air quality standard for PM_{2.5} was adopted in 1997. Currently, no methodologies for determining impacts relating to PM_{2.5} have been developed. In addition, no strategies or mitigation programs for this pollutant have been developed or adopted by federal, state, or regional agencies.

Source: California Air Resources Board, Ambient Air Quality Standards, 2006 and the USEPA, 2006.

Title II of the CAA pertains to mobile sources, such as cars, trucks, buses, and planes. Title II regulations have resulted in tailpipe emission standards for mobile sources, which have strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially and initiatives pertaining to reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps have been implemented by the USEPA to regulate mobile air emission sources.

Table 55

South Coast Air Basin Attainment Status

Pollutant	National Status	California Status
Ozone (O ₃) (1-hour standard)	Extreme	Non-attainment
Ozone (O ₃) (8-hour standard)	Severe-17	N/A
Carbon Monoxide (CO)	Serious ^a	Non-attainment
Nitrogen Dioxide (NO ₂)	Attainment ^b	Attainment ^b
Sulfur Dioxide (SO ₂)	Attainment ^b	Attainment ^b
PM ₁₀	Serious	Non-attainment
PM _{2.5}	Serious	Non-attainment
Lead (Pb)	Attainment ^b	Attainment ^b

N/A = not applicable

^a The Basin has technically met the CO standards for attainment since 2002, but the official status has not been reclassified by the USEPA.

^b An air basin is designated as being in attainment for a pollutant if the standard for that pollutant was not violated at any site in that air basin during a three year period.

Source: USEPA Region 9 and California Air Resources Board, 2006.

(2) State Level

(a) California Air Resource Board (CARB)

The CARB is the State agency responsible for the coordination and administration of both state and federal air pollution control programs within California. The CARB undertakes research, sets California Ambient Air Quality Standards (CAAQS), provides technical assistance to local Air Quality Management Districts (AQMDs) and Air Pollution Control Districts (APCDs), compiles emission inventories, develops suggested control measures and provides oversight of local programs.

A key function of the CARB is to coordinate and guide regional and local air quality planning efforts required by the California Clean Air Act (CCAA) and to prepare and submit the SIP to the USEPA. The California SIP is comprised of plans developed at the regional or local level. Each of these plans is reviewed and approved by the USEPA prior to incorporation into the SIP. The CARB also establishes emission standards for motor vehicles. The CCAA allows California to adopt more stringent vehicle emission standards than the rest of the nation due to the state's severe O₃ non-attainment status.

(b) California Clean Air Act

The CCAA, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and has set standards for other pollutants recognized by the State, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. In general, the California standards are more health protective than the NAAQS. At the State level, the CARB also is responsible for implementation of the CCAA.

While air quality in the Basin has improved, the Basin requires continued diligence to meet air quality standards. The Basin fails to meet CAAQS for O₃ (the 1-hour standard), PM₁₀, PM_{2.5}, and CO, and therefore is considered a non-attainment area for these pollutants. The CARB requires regions that do not meet the CAAQS to submit clean air plans that describe attainment initiatives for certain pollutants. The Basin currently meets the CAAQS for sulfates, hydrogen sulfide and vinyl chloride. Table 54 on pages 515 and 516 shows the CAAQS currently in effect for each criteria pollutant. Table 55 on page 517 lists the criteria pollutants and their relative attainment status.

(c) Air Quality and Land Use Planning Guidelines

The CARB adopted the Air Quality and Land Use Handbook (April 2005) to provide guidance to planning agencies and air districts for considering potential impacts to sensitive land uses proposed in proximity to toxic air contaminant (TAC) emission source(s). The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. CARB's siting guidelines recommended the following: (1) avoid siting sensitive receptors within 500 feet of freeways and high-traffic roads (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day); (2) avoid siting sensitive receptors within 1,000 feet of a distribution center; and (3) avoid siting sensitive receptors within 300 feet of a dry cleaning facility that use the chemical perchloroethylene. The recommendations provided are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. Diesel particulate matter (DPM) is a TAC and reducing DPM is one of the CARB's highest public health priorities and the focus of a comprehensive statewide control program. The CARB's long-term goal is to reduce DPM emissions 85 percent by 2020.

(3) Regional Level

(a) South Coast Air Quality Management District (SCAQMD)

The SCAQMD has jurisdiction over an area of 10,743 square miles, consisting of all of Orange County, all of Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of

Riverside County. The Basin is a sub-region of the SCAQMD's jurisdiction and covers an area of 6,745 square miles.

The SCAQMD has adopted a series of Air Quality Management Plans (AQMP) to meet the CAAQS and NAAQS. These plans require, among other emissions-reducing activities, control technology for existing sources; control programs for area sources and indirect sources; a SCAQMD permitting system designed to allow no net increase in emissions from any new or modified (i.e., previously permitted) emission sources; transportation control measures; sufficient control strategies to achieve a five percent or more annual reduction in emissions (or 15 percent or more in a 3-year period) for Volatile Organic Compounds (VOC), NO_x, CO, and PM₁₀; and compliance demonstration by established recordkeeping and reporting protocols.

The SCAQMD adopted a comprehensive AQMP update in August 2003.¹¹⁶ The 2003 AQMP for the Basin outlines the air pollution control measures needed to meet Federal health-based standards for O₃ (1-hour standard) by 2010 and PM₁₀ by 2006. It also demonstrates how the Federal standard for CO, achieved for the first time at the end of 2002, will be maintained.¹¹⁷ This revision to the AQMP also addresses several State and Federal planning requirements and incorporates substantial new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological data, and new air quality modeling tools. The 2003 AQMP is consistent with and builds upon the approaches taken in the 1997 AQMP and the 1999 Amendments to the Ozone SIP for the South Coast Air Basin. Lastly, the 2003 AQMP takes a preliminary look at what will be needed to achieve new and more stringent health standards for ozone and PM_{2.5}.

In adopting the AQMP, the SCAQMD: (1) committed to analyzing 12 additional long-term control measures, such as requiring the electrification of all cranes at ports; (2) set a target for distributing needed long-term emission reductions between AQMD, CARB and USEPA; (3) assigned emission reductions to the USEPA,¹¹⁸ and (4) forwarded to CARB and USEPA a list of more than 30 specific measures for consideration to further reduce emissions from on- and off-road mobile sources and consumer products. The AQMP identifies 26 air pollution control measures to be adopted by the SCAQMD to further reduce emissions from businesses and industry. It also identifies 22 measures to be adopted by CARB and the USEPA to further

¹¹⁶ *South Coast Air Quality Management District, AQMD Website, www.aqmd.gov/news1/aqmp_adopt.htm. Accessed January 5, 2006.*

¹¹⁷ *The Basin has technically met the CO standards since 2002, but the official attainment status has not been reclassified by the USEPA.*

¹¹⁸ *CARB submitted the 2003 AQMP to the USEPA in October 2003 for review and approval. The USEPA had not approved the modified version of the 2003 AQMP when this Air Quality Impact Analysis was prepared. In the event that USEPA rejects the plan, the assigned emissions reductions would be eliminated,*

reduce pollution from cars, trucks, construction equipment, aircraft, marine vessels and consumer products.

The SCAQMD also adopts rules to implement portions of the AQMP. Several of these rules may apply to construction or operation of the Project. Rule 403 requires the implementation of best available fugitive dust control measures during active operations capable of generating fugitive dust emissions from onsite earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The full text of the current version of SCAQMD Rule 403, amended in June 2005, is included in Appendix D of this Draft EIR.

The SCAQMD has published a handbook (CEQA Air Quality Handbook, November 1993) that is intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. This handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. In addition, the SCAQMD has published a guidance document (Localized Significance Threshold Methodology for CEQA Evaluations, June 2003) that is intended to provide guidance in evaluating localized effects from mass emissions during construction.

(b) Air Quality and Land Use Planning Guidelines

The SCAQMD has adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (May 2005), which also considers impacts to sensitive receptors from facilities that emit TAC emissions. SCAQMD's distance recommendations are the same as those provided by CARB (e.g. a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

(c) Regional Comprehensive Plan and Guide

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG is the federally designated metropolitan planning organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. As the designated MPO, SCAG is mandated by the federal government to develop and implement regional plans that address transportation, growth management, hazardous waste management, and air quality issues. With respect to air quality planning, SCAG has prepared the Regional

Comprehensive Plan and Guide (RCPG) for the SCAG region, which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation components of the AQMP and are utilized in the preparation of air quality forecasts and the consistency analysis that is included in the AQMP.

(4) County and Local Level

(a) Los Angeles County Congestion Management Plan

The Congestion Management Plan (CMP) for the County of Los Angeles was developed to meet the requirements of Section 65089 of the California Government Code. In enacting the CMP statute, the State legislature noted the increasing concern that urban congestion was impacting the economic vitality of the State and diminishing the quality of life in many communities. The CMP was created to further the following objectives:

- To link land use, transportation and air quality decisions;
- To develop a partnership among transportation decision makers to encourage appropriate transportation solutions that include all modes of travel; and
- To propose transportation projects which are eligible for State gas tax funds.

(b) General Plan

California state law requires that each city adopt a long-term comprehensive general plan which must be an integrated, internally consistent and compatible statement of goals, objectives, policies and implementation programs. This document then becomes the basis for decision making regarding the city's long term physical development.

The City of Los Angeles has included an Air Quality Element as part of its General Plan. The planning area for the City's Air Quality Element covers the entire City of Los Angeles, which encompasses an area of about 465 square miles. The most recent revision of the Air Quality Element for the Los Angeles City General Plan was adopted in November 1992. The objectives of this revised Air Quality Element are to aid the region in attaining CAAQS and NAAQS, while continuing to allow economic growth and improvement in the quality of life for city residents. The City's Air Quality Element and the accompanying Clean Air Program acknowledges the inter-relationships between transportation and land use planning in meeting the City's mobility and clean air goals. With the City's adoption of the Air Quality Element and the accompanying Clean Air Program, the City is seeking to achieve consistency with regional Air Quality, Growth Management, Mobility, and Congestion Management Plans.

To achieve these goals, performance based standards have been adopted to provide flexibility in implementation of the policies and objectives, of the City's Air Quality Element. The following City Air Quality Element goals, objectives and policies are relevant to the Proposed Project:

Goal 2—Less reliance on single occupant vehicles with fewer commute and non-work trips.

Objective 2.1—It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Goal 4—Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1—Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Objective 4.2—It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.2—Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

b. Existing Conditions

(1) Regional Context

The proposed Project is located within the Basin, an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. Its terrain and geographical location determine the distinctive climate of the Basin, as the Basin is a coastal plain with connecting broad valleys and low hills.

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

The greatest air pollution impacts throughout the Basin occur from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California.

The SCAQMD has published a Basin-wide air toxics study (MATES II, Multiple Air Toxics Exposure Study, March 2000). The MATES II study represents one of the most comprehensive air toxics studies ever conducted in an urban environment. The study was aimed at determining the cancer risk from toxic air emissions throughout the Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Basin. The study concluded that the average carcinogenic risk in the Basin is approximately 1,400 in one million. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 70 percent of all of the risk is attributed to diesel particulate emissions, approximately 20 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 10 percent of all carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses, such as dry cleaners and chrome plating operations). The SCAQMD is in the process of updating the MATES II Study with a MATES III Study. The MATES III Study was slated to end in April 2005. Due to the unusually high levels of rainfall during the study period, air toxics monitoring data collected to-date indicate a much cleaner year than normal. As such, the SCAQMD has extended the MATES III air toxics monitoring element to April 2006.

The ARB prepares a series of maps that show regional trends in estimated outdoor inhalable cancer risk from air toxic emissions in an ongoing effort to provide insight as to the relative risk. The estimates represent the number of potential cancers per million people based on a lifetime of breathing air toxics (i.e., 24 hours per day outdoors for 70 years). The Year 2001 Central Los Angeles County map, which is the most recently available map to represent existing

conditions, is provided in Figure 42 on page 525. As shown in Figure 42, the cancer risk ranges from 100 to 1,500 cancers per million, while the vast majority of the area is between 750 and 1,500 cancers per million.¹¹⁹ Generally, the risk from air toxics is lower near the coastline and increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports).

The data from the SCAQMD and ARB provide a slightly different range of risk. This difference is primarily related to the fact that the SCAQMD risk is based on monitored pollutant concentrations and the ARB risk is based on dispersion modeling and emission inventories. Regardless, the SCAQMD and ARB data shows that there is an inherent health risk associated with living in urbanized areas of the Basin, where mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors to the overall risk.

(2) Local Area Conditions

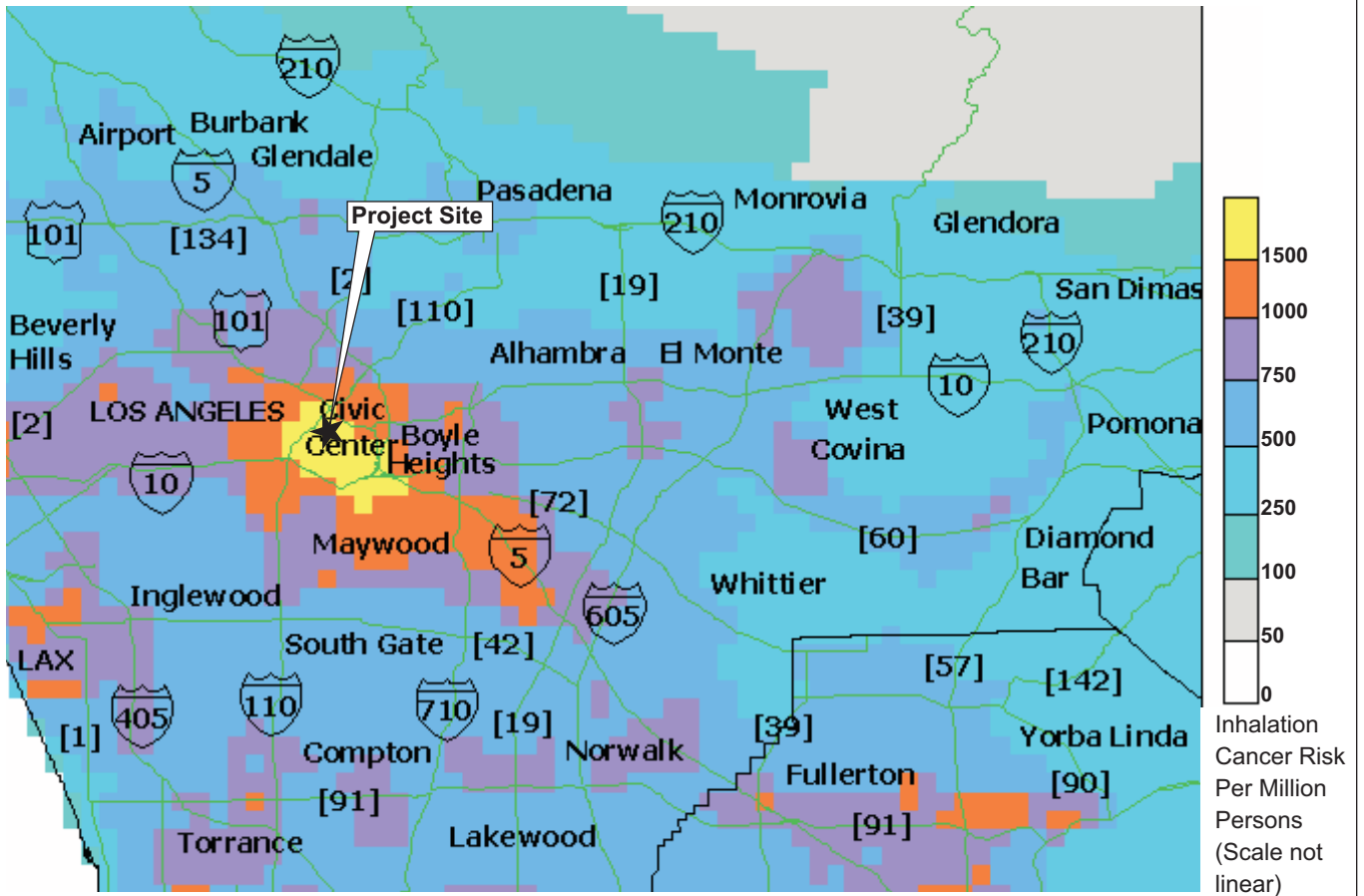
(a) Existing Pollutant Levels for Project Vicinity

The SCAQMD maintains a network of air quality monitoring stations located throughout the South Coast Air Basin and has divided the Basin into source receptor areas (SRAs) in which monitoring stations operate. The proposed Project is located within SRA Number 1 (Central Los Angeles). SRA Number 1 covers approximately 110 square miles and is roughly bounded by Mulholland Drive to the north, the Long Beach Freeway (Interstate 710) to the east, Slauson Avenue to the South and La Cienega Boulevard to the west. The monitoring station closest to the Project site is located at 1630 North Main Street in downtown Los Angeles. This station is located approximately 1.5 mile northeast of the northernmost boundary of the proposed Project. Criteria pollutants, including O₃, CO, SO₂, NO_x, PM₁₀, and PM_{2.5} are monitored at this station. The most recent data available from this monitoring station encompasses the years 2000 to 2004. The data, shown in Table 56 on pages 526 and 527, show the following trends:

Ozone. During the 2001 to 2005 reporting period, the maximum one-hour ozone concentration was recorded in 2003 at 0.15 ppm. Eight exceedances of the California one-hour ozone standard (0.09 ppm) were recorded annually from 2001 to 2002, as compared to 11 times during 2003. The National standard of 0.12 ppm was exceeded one time in 2003. The maximum eight-hour ozone concentration recorded during the reporting period was 0.10 ppm, also reported in 2001 and 2005. During the 2001 to 2005 reporting period, the National standard of 0.08 ppm was exceeded two times in 2003, as compared to zero in 2002.

¹¹⁹ <http://www.arb.ca.gov/toxics/cti/hlthrisk/cncrinhl/riskmapviewfull.htm>.

Total Risk (diesel + nondiesel)
 Central Los Angeles: 2001 Cancer Risk Per Million
 All Sources



Source: Air Resource Board, 2006



Figure 42
 Total Cancer Risk for
 Central Los Angeles County

Table 56

Pollutant Standards and Ambient Air Quality Data^a

Pollutant/Standard	2001	2002	2003	2004	2005
Ozone (O₃)					
<u>O₃ (1-hour)</u>					
Maximum Concentration (ppm)	0.12	0.12	0.15	0.11	0.12
Days > CAAQS (0.09 ppm)	8	8	11	7	2
Days > NAAQS (0.12 ppm)	0	0	1	0	0
<u>O₃ (8-hour)</u>					
Maximum Concentration (ppm)	0.10	0.08	0.09	0.09	0.10
Days > NAAQS (0.08 ppm)	1	0	2	1	1
Particulate Matter (PM₁₀)					
<u>PM₁₀ (24-hour)</u>					
Maximum Concentration (µg/m ³)	97	65	81	72	70
Days > CAAQS (50 µg/m ³) ^b	20	8	6	5	N/A
Days > NAAQS (150 µg/m ³) ^b	0	0	0	0	0
<u>PM₁₀ (Annual Average)</u>					
CAAQS Annual Arithmetic Mean (50 µg/m ³) ^c	44	39	35	33	N/A
NAAQS Annual Geometric Mean (20 µg/m ³) ^c	40	38	34	33	N/A
Particulate Matter (PM_{2.5})					
<u>PM_{2.5} (24-hour)</u>					
Maximum Concentration (µg/m ³)	73	66	84	75	74
Days > NAAQS (65 µg/m ³)	4	1	5	2	2
<u>PM_{2.5} (Annual Average)</u>					
NAAQS Annual Geometric Mean (12 µg/m ³) ^c	23	22	21	20	18
Carbon Monoxide (CO)					
<u>CO (1-hour)</u>					
Maximum Concentration (ppm)	6	5	6	4	4
Days > CAAQS (20 ppm)	0	0	0	0	0
Days > NAAQS (35 ppm)	0	0	0	0	0
<u>CO (8-hour)</u>					
Maximum Concentration (ppm)	5	4	5	3	3
Days > CAAQS (9 ppm)	0	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0	0

Table 56 (Continued)

Pollutant Standards and Ambient Air Quality Data

Pollutant/Standard	2001	2002	2003	2004	2005
Nitrogen Dioxide (NO₂)					
<u>NO₂ (1-hour—State Standard)</u>					
Maximum Concentration (ppm)	0.14	0.14	0.16	0.16	0.13
Days > CAAQS (0.25 ppm)	0	0	0	0	0
<u>NO₂ (Annual Average—National Standard))</u>					
CAAQS Annual Arithmetic Mean (0.05 ppm) ^c					
Days > NAAQS (0.05 ppm)	0.04	0.03	0.03	0.03	0.03
	0	0	0	0	0
Sulfur Dioxide (SO₂)					
<u>SO₂ (1-hour)</u>					
Maximum Concentration (ppm)	0.03	0.02	0.05	0.08	0.07
Days > CAAQS (0.25 ppm)	0	0	0	0	0
<u>SO₂ (24-hour)</u>					
Maximum Concentration (ppm)	0.01	0.02	0.01	0.02	0.01
Days > CAAQS (0.04 ppm)	0	0	0	0	0
Days > NAAQS (0.14 ppm)	0	0	0	0	0
<u>SO₂ (Annual Average)</u>					
CAAQS Annual Arithmetic Mean ^c					
Days > NAAQS (0.03 ppm)	0.003	0.002	0.002	0.002	0.002
	0	0	0	0	0

^a ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; N/A = not available

Ambient data was obtained from the 1630 North Main Street monitoring station in downtown Los Angeles

Ambient data for airborne lead is not included in this table since the Basin is currently in compliance with state and national standards for lead.

^b Measurements are usually collected every six days. Measured days count the days that a measurement was greater than the level of the standard

^c The arithmetic mean is the sum of all the pollutant concentrations measured divided by the number of measurements per year. Whereas, the geometric mean is the average concentration measured over the year.

Source: California Air Resources Board, Ambient Monitoring Data 2000–2005.

Particulate Matter (PM₁₀). The highest recorded concentration during the reporting period occurred in 2001 and was 97 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of air particulates. During the reporting period, the California PM₁₀ standard was exceeded between 5 and 20 times annually, with the highest number of exceedances in 2000. No exceedances of the National

standard occurred during the 2001 to 2005 reporting period. The highest annual arithmetic mean recorded was $44 \mu\text{g}/\text{m}^3$ in 2001, where as the highest annual geometric mean was $40 \mu\text{g}/\text{m}^3$ also recorded in 2001. Throughout the reporting period the annual arithmetic mean did not exceed the California standard, although the National annual geometric standard was exceeded each year.

Particulate Matter (PM_{2.5}). The highest recorded concentration during the reporting period was $84 \mu\text{g}/\text{m}^3$ in 2003. The National standard was exceeded during all five years of the reporting period ranging from one to five times annually. The highest annual geometric mean recorded was $23 \mu\text{g}/\text{m}^3$ in 2001. The annual geometric mean exceeded the National standard throughout the 2001 to 2005 time period.

Carbon Monoxide. The highest 1-hour CO concentration was 6 ppm recorded in 2001 and 2003. The highest 8-hour CO concentration was 5 ppm, also recorded in 2001 and 2003. Neither the California nor the National CO standards were exceeded during the 2001 to 2005 reporting period.

Nitrogen Dioxide. The highest one-hour concentration of NO₂ was recorded in 2003 and 2004, and was 0.16 ppm. The highest annual arithmetic mean during the 2001 to 2005 reporting period was 0.04 ppm, recorded in 2001. Neither the California nor the National NO₂ standards were exceeded during the 2001 to 2005 reporting period.

Sulfur Dioxide. The highest one-hour concentration was 0.08 ppm, recorded in 2004. The 24-hour concentrations recorded ranged from 0.01 ppm to 0.02 ppm for the years during the reporting period and the annual arithmetic mean ranged from 0.002 to 0.003 ppm over the 2001 to 2005 reporting period. No exceedances of the California or the National SO₂ standards were recorded during this reporting period.

Lead. The Basin is currently in compliance with California and National standards for Pb and, therefore, no ambient data for airborne Pb is available for the applicable monitoring stations.

(b) Existing Health Risk in the Surrounding Area

As shown above in Figure 42 on page 525, the Project site is located within a cancer risk zone of 1,500 in one million. However, the visual resolution available in the map is 1 kilometer by 1 kilometer and, thus, impacts from individual facilities for individual neighborhoods are not discernable on this map. In general, the project site is indicative of other areas in downtown Los Angeles.

(c) Sensitive Receptors and Locations

Some population groups, such as children, the elderly, and acutely and chronically ill persons, especially those with cardio-respiratory diseases, are considered more sensitive to air pollution than others. The SCAQMD defines sensitive land uses (i.e., receptors) as residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive land uses in the vicinity of the Project site include residential uses, public and private school uses, and day care centers. Sensitive land uses in the Project vicinity are shown in Figure 43 on page 530 and include existing sensitive land uses as well as those that are proposed for development (i.e., the related projects listed in Section III.B of this Draft EIR).

3. ENVIRONMENTAL IMPACTS

a. Significance Thresholds

The City of Los Angeles has set forth criteria in the City of Los Angeles CEQA Thresholds Guide (1998). Because of the SCAQMD's regulatory role in the Basin, this set of criteria is consistent with what is set forth in the SCAQMD's *CEQA Air Quality Handbook*.

Construction Emissions

Based on criteria set forth in the City of Los Angeles CEQA Thresholds Guide (1998), the proposed Project would have a significant impact with regard to construction emissions if any of the following occur:

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds per day (lbs/day) for VOC; (2) 100 lbs/day for NO_x; (3) 550 lbs/day for CO; and (4) 150 lbs/day for PM₁₀ or SO_x.¹²⁰[NOTE TO TEAM: The 1993 SCAQMD CEQA Air Quality Handbook uses ROC. However, the significance thresholds on the SCAQMD online handbook were recently updated and use VOC instead of ROC.]

¹²⁰ *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.*

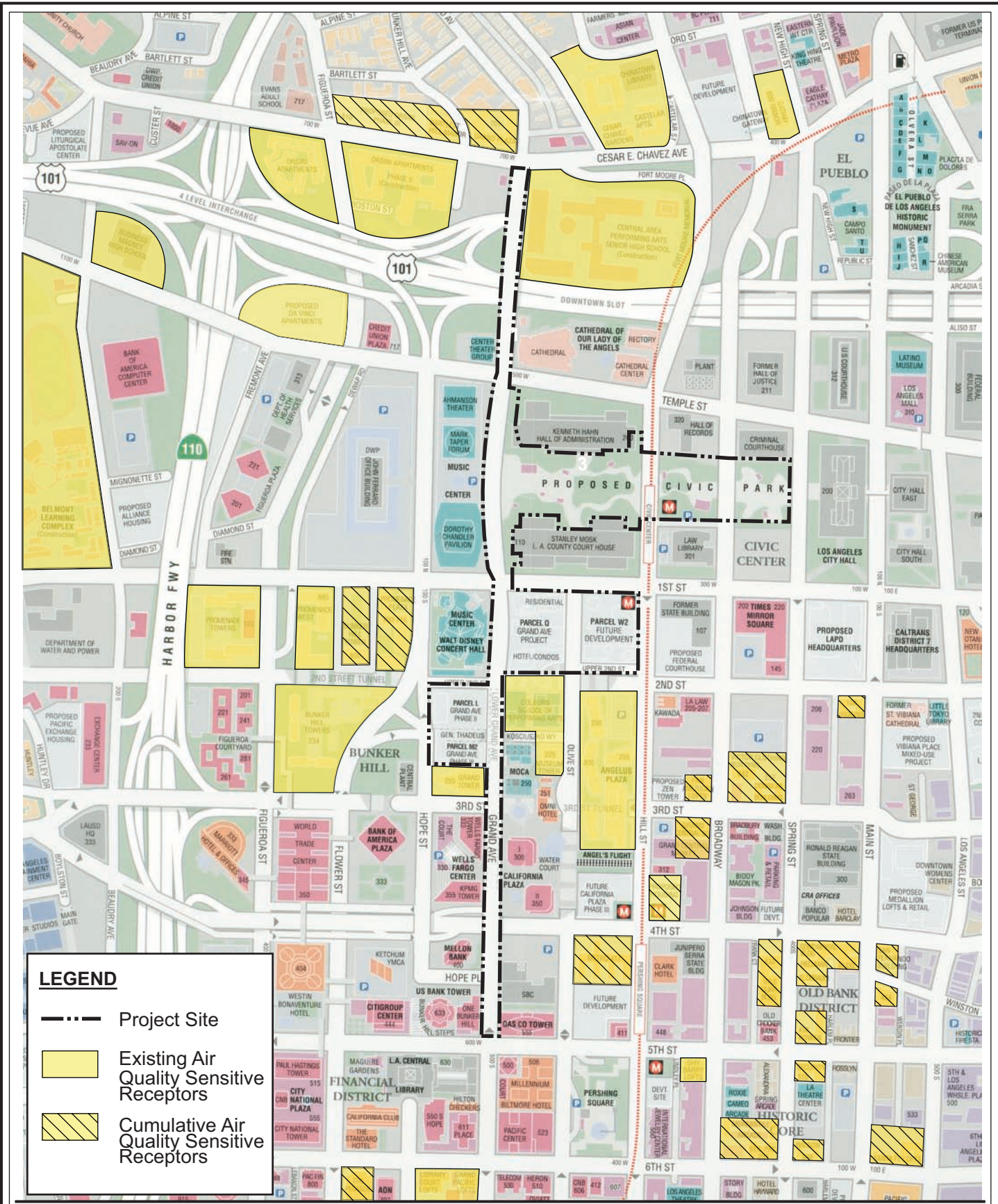


Figure 43
Air Quality
Sensitive Receptor

Source: CARTIFACT, 2006



- Project-related fugitive dust and construction equipment combustion emissions cause an incremental increase in localized PM₁₀ concentrations of 10.4 µg/m³ or cause a violation of NO₂ or CO ambient air quality standards.¹²¹
- The proposed Project creates objectionable odors.

Operational Emissions

Based on criteria set forth in the City of Los Angeles' CEQA Thresholds Guide, the proposed Project would have a significant impact with regard to operational emissions if any of the following occur:

- Operational emissions exceed any of the daily thresholds presented below:¹²²

Pollutant	Significance Threshold (lbs/day)
VOC	55
NO _x	55
CO	550
PM ₁₀	150
SO _x	150

- The proposed Project results in an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively, at an intersection or roadway within one-quarter mile of a sensitive receptor.
- Project-related stationary source combustion equipment emissions cause an incremental increase in localized PM₁₀ concentrations of 2.5 µg/m³.¹²³
- The proposed Project creates objectionable odors.

¹²¹ While the SCAQMD CEQA Air Quality Handbook (CEQA Handbook, 1993), does not provide any localized thresholds, the SCAQMD currently recommends localized significance thresholds (LST) for PM₁₀, NO₂, and CO in its draft document titled "SCAQMD Localized Significance Threshold Methodology for CEQA Evaluations (SCAQMD LST Guidelines)," June 19, 2003.

¹²² South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.

¹²³ While the SCAQMD CEQA Air Quality Handbook (CEQA Handbook, 1993), does not provide any localized thresholds, the SCAQMD currently recommends localized significance thresholds (LST) for PM₁₀, NO₂, and CO in its document titled "SCAQMD Localized Significance Threshold Methodology for CEQA Evaluations (SCAQMD LST Guidelines)," June 19, 2003.

- The proposed Project is incompatible with SCAQMD and SCAG air quality policies. The proposed Project would not be compatible with these policies if it:
 - causes an increase in the frequency or severity of existing air quality violations;
 - causes or contributes to new air quality violations;
 - delays timely attainment of air quality standards or the interim emission reductions specified in the AQMP; or
 - exceeds the assumptions utilized in the SCAQMD’s AQMP.
- The proposed Project is incompatible with City of Los Angeles air quality policies. The proposed Project would not be compatible with these policies if it does not substantially comply with the air quality goals and policies set forth within the City’s General Plan.

Toxic Air Contaminants

Based on criteria set forth in the City of Los Angeles CEQA Thresholds Guide, the proposed Project would have a significant impact with regard to toxic air contaminants if:

- On-site stationary sources emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million or an acute or chronic hazard index of 1.0.¹²⁴
- Hazardous materials associated with on-site stationary sources result in an accidental release of air toxic emissions or acutely hazardous materials posing a threat to public health and safety.
- The Project would be occupied primarily by sensitive individuals within a quarter mile of any existing facility that emits air toxic contaminants that could result in a health risk for pollutants identified in District Rule 1401.¹²⁵

b. Project Features

The following design features result in a reduction in air quality emissions and are proposed as part of the Project.

¹²⁴ SCAQMD Risk Assessment Procedures for Rules 1401 and 212, November 1998.

¹²⁵ SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project).

Construction

-

The proposed Project would comply with SCAQMD rules relating to fugitive dust, asbestos, in demolition and architectural coatings.

Operation

A primary objective in the design of the proposed Project is to create a development which minimizes the air pollutant emissions that are generated by the Project. To achieve this objective, Related Companies focused on reducing vehicle trips and vehicle miles traveled. This approach implements the policy direction provided by SCAG for land development projects. The design program incorporated into the proposed Project to minimize pollutant emissions consists of the following two components: (1) the choice and organization of land uses within the proposed Project site, and (2) the promotion of alternative travel modes.

Mixed Use Development

The land use plan for the proposed Project was developed seeking to create a community which provides a wide range of opportunities to meet the needs of the community by providing a balanced mix of residential, commercial, and community-serving land uses. This approach minimizes on- and off-site vehicle use by providing a variety of daily needs within a short walk from any residence or business. In addition, on-site development would reflect the following: (1) include uses/businesses that do not emit high levels of potentially toxic contaminants or odors; and (2) all stationary-source emissions sources (e.g., emergency generator) would be constructed utilizing Best Available Control Technology (BACT) to meet SCAQMD requirements.

Location of Residential Uses

The placement of residential uses in the design of the proposed Project serves the objective of minimizing mobile source pollutant emissions. Residential development would be located in close proximity to potential employment areas, rail, light rail, subway, bus services and access ramps of the nearby freeways. Such concentration and placement are intended to reduce vehicle miles traveled within the Project site and within the region and subregion by reducing commute distances for residents in the area. The provision of residential space in close proximity to commercial space, theatres, and other entertainment sources increases the probability that residents may walk or commute to areas of interest or places of business, thus reducing the vehicle miles traveled.

Civic Park

Under the Conceptual Plan, a broad spectrum of facilities (e.g., public activity kiosks, food and drink concessions, plaza spaces, pedestrian plazas, new stairs and elevators, paved plaza, multi-use pavilions, and new broader pedestrian access crossings) is proposed within the Civic Park which is in close proximity to on-site residents and businesses. The proximity of these facilities to residential and commercial uses would also in turn, serve to reduce vehicular trips and miles traveled.

Jobs/Housing Linkage

The proposed array of residential, retail, and office uses would, in itself, promote a reduction of mobile source emissions by providing a large supply of housing as well as employment opportunities within close proximity to one another as well as within the Downtown area, making it possible for an individual to both reside and work within the Project site or the general area. In addition, the Project would provide a substantial amount of housing in a jobs-rich subregion. (See Section IV.J, Population, Housing and Employment, for additional information regarding the jobs/housing issue.)

The revitalization is also intended to facilitate the development of a “24-hour City” and to encourage mixed commercial and residential uses in order to improve air quality and to reduce vehicle trips and miles traveled by locating residents, jobs, hotels, and transit centers near each other.¹²⁶

Promotion of Alternative Travel Modes

The design of the proposed Project facilitates reductions in pollutant emissions from the arrangement of proposed land uses, as described above, as well as through the promotion of alternative modes of travel such as mass transit, bicycling, and walking. In addition, wider sidewalks along the segment of Grand Avenue proposed for improvement are intended to facilitate and improve pedestrian movement and create a positive environment for sidewalk cafes, special events, and building entrances. To further enhance the pedestrian experience, street furnishings would be consistent with the modern identity of Grand Avenue with the explicit intent of improving the street environment.

¹²⁶ LAMC, *Planning and Zoning Code Section 12.22A (26)*.

c. Methodology

The evaluation of potential impacts to local and regional air quality that may result from the construction and long-term operations of the proposed Project is based on the following methodological approach:

(1) Regional Criteria Pollutant Impacts

(a) Construction Impacts

Daily regional emissions during construction were forecasted by assuming an aggressive construction schedule (i.e., assuming large amounts of construction occurs at the earliest feasible date) and applying the mobile-source and fugitive dust emissions factors derived from URBEMIS 2002.¹²⁷

(b) Operational Impacts

Project operations refer to activities that would occur at a Project site when construction is complete and the site has been occupied with its intended use. Emissions from Project operations can be divided into three main categories: (1) indirect sources; (2) area sources; and (3) stationary sources. Indirect sources are defined as buildings, facilities, structures, or properties that attract or generate mobile source activity (autos and trucks). This includes retail uses, employment sites, housing developments, etc. Area sources are sources that individually emit small quantities of air pollutants, but which cumulatively may represent significant quantities of emissions. Water heaters, lawn maintenance equipment, and the application of paints and lacquers during maintenance activities are examples of area source emissions. Stationary, or point, sources are equipment or devices operating at commercial facilities that directly emit air pollutants. The SCAQMD recommends that impact assessments should evaluate all three categories of emissions when determining impacts from a project's operations.

(i) Mobile-Source Emissions

The SCAQMD recommends using URBEMIS2002 for calculating indirect emissions from development projects. The air quality analysis incorporated model default values, with the following exception. Project-specific trip-generation rates were incorporated into the analysis based on the Project's traffic study.¹²⁸ In calculating mobile-source emissions, the URBEMIS

¹²⁷ URBEMIS 2002 is an emissions estimation/evaluation model developed by the ARB that is based, in part, on SCAQMD CEQA Air Quality Handbook guidelines and methodologies.

¹²⁸ The Mobility Group, Traffic Study for the Grand Avenue Project, May 2006.

2002 default trip length assumptions were applied to the average daily trip estimates provided by the Project's traffic consultant to arrive at vehicle miles traveled.

(ii) Stationary Sources

The SCAQMD recommends that URBEMIS2002 be used to calculate area source emissions. The program allows the estimation of area-source emissions for natural gas fuel consumption from space and water heating, landscape maintenance equipment, and consumer products. Consumer products include reactive organic compound emissions released through the use of products such as hair sprays and deodorants. URBEMIS2002 default assumptions were used for evaluating area source emissions.

Pollutant emissions associated with energy demand (i.e., electricity generation) are classified by the SCAQMD as regional stationary-source emissions. Electricity is produced at various locations within, as well as outside of, the Basin. Since it is not possible to isolate where electricity is produced, these emissions are conservatively considered to occur within the Basin and are regional in nature. Criteria pollutant emissions associated with the production and consumption of energy were calculated using emission factors from the SCAQMD's CEQA Air Quality Handbook, 1993.

(2) Localized Criteria Pollutant Impacts (Construction and Operations)

The localized effects from the on-site portion of daily emissions were evaluated at each sensitive receptor location potentially impacted by the Project using the SCAQMD's localized significance threshold (LST) methodology, which utilizes on-site mass emissions rate look up tables. These tables have been developed to serve as a screening level analysis to determine the potential for localized impacts based on the distance between on-site emissions sources and sensitive receptor locations. If the screening level criteria are exceeded, then emissions would be modeled using SCAQMD's recommended Industrial Source Classification (ISC) model to determine if an exceedance of either the NAAQS or the CAAQS would occur. The URBEMIS 2002 output sheets, which detail construction equipment assumptions by phase and construction phase durations, are provided in Appendix D (Air Quality) of this Draft EIR.

Local area CO concentrations for roadways were evaluated using the CALINE4 traffic pollutant dispersion model, developed by Caltrans and recommended by the SCAQMD, in combination with EMFAC 2002 emission factors. The analysis of roadway CO impacts followed the protocol recommended by Caltrans and published in the document titled *Transportation Project-Level Carbon Monoxide Protocol*, December 1997. The protocol recommends a hotspot evaluation of potential localized CO impacts when volume-to-capacity ratios increase by 2 percent at intersections with a level of service (LOS) of C or worse. All four corners of each intersection were then analyzed with receptor locations positioned 3 meters from

each intersection for the 1-hour analysis and 7 meters for the 8-hour analysis. The estimated CO concentrations from the CALINE4 modeling results were then compared to State and federal CO standards to determine whether the Project would have a significant air quality impact.

Localized PM₁₀ concentrations related to operation of proposed Project stationary-source combustion equipment are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling) as necessary. The screening-level analysis consists of reviewing the proposed Project's site plan and Project description to identify any new or modified stationary-source combustion equipment sources. If it is determined that the proposed Project would introduce a new stationary-source combustion equipment source, or modify an existing stationary-source combustion equipment source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed Project impacts. All emissions calculation worksheets and air quality modeling output files are provided in Appendix D of this Draft EIR.

(3) Toxic Air Contaminants (TAC) Impacts (Construction and Operations)

Potential off-site TAC impacts are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The screening-level analysis consists of reviewing the proposed Project's site plan and Project description to identify any new or modified TAC emissions sources. If it is determined that the proposed Project would introduce a new source, or modify an existing TAC emissions source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed Project impacts.

Potential on-site TAC impacts are evaluated using ARB's *Air Quality and Land Use Handbook: A Community Health Perspective* as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions. If the proposed Project would introduce a new sensitive land use within the ARB recommended minimum siting distances, site-specific modeling would be conducted to determine proposed Project impacts.

(4) Odor Impacts (Construction and Operations)

Potential odor impacts are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling) as necessary. The screening-level analysis consists of reviewing the proposed Project's site plan and Project description to identify any new or modified odor sources. If it is determined that the proposed Project would introduce a new odor source, or modify an existing odor source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed Project impacts.

d. Project Impacts

(1) Proposed Project

(a) Construction

(i) Regional Construction Impacts

Construction of the proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_x, would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release reactive organic compounds. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Development of the proposed Project is anticipated to occur in three phases. The initial development phase would include the simultaneous completion of Civic Park; Grand Avenue streetscape improvements between Second and Temple Streets; and the development of Parcel Q. The second phase would include the development of Parcels L and M-2 and Grand Avenue streetscape improvements between Second Street and Fifth Street. The third phase would include the complete development of Parcels W-1 and W-2 and Grand Avenue streetscape improvements between Temple Street and Cesar E. Chavez Avenue. Each of the three development phases for the parcels would require a period of approximately three years of active construction. Construction stages would include demolition, excavation, and construction of foundations, garages, and podium to the street level (Year 1); construction of the superstructure from the top of the podium and the initial shell enclosure (Year 2); and interior and exterior finish construction and landscaping (Year 3). The approximate timeline for the three development phases would be 2006-2009 for the first phase; 2010-2012 for the second phase; and 2013-2015 for the third phase.

In the event that the overall construction schedule would be accelerated, the second phase of the project would commence in 2008 rather than 2010. Also under the accelerated scenario, the second phase would overlap part of the first phase. The duration of each phase would remain 36-months to completion, but the second phase would commence sooner than the proposed schedule. As such, there would be two possible scenarios, an average (proposed) and accelerated schedule. In order to provide a conservative analysis and to account for possible changes in schedule, both scenarios were analyzed for air quality impacts.

It is expected that the accelerated schedule analysis would be most conservative as it represents the minimum timeframe anticipated for the construction of any particular building and concentrates the construction duration so it is occurring concurrently and at the earliest feasible date within the Project's overall development period. This is of particular importance as construction emissions are directly related to the duration and intensity of construction activities (i.e., emissions increase as the amount of construction increases). Emission rates representative of certain stages of construction (i.e., construction worker trips and delivery vehicle trips) can also decrease over time in response to the use of vehicles or equipment that emit lower levels of pollutant emissions. The different groups of construction activities (i.e., demolition, site preparation/excavation, and building construction/finishing) and the equipment that would be used during Project construction are provided in Appendix D of this Draft EIR.

Information regarding the estimate of potential daily emissions during construction activities is presented in Table 57 on page 540. Detailed emission calculations are provided in Appendix D of this Draft EIR. As presented in Table 57, construction-related daily net emissions of SO_x would be considered adverse but less than significant as the estimated net emissions for these pollutants would fall below their respective SCAQMD significance thresholds. However, daily net emissions of VOC, NO_x, PM₁₀, and CO would be considered significant as the estimated emissions for these pollutants exceed their respective SCAQMD significance thresholds. These emission forecasts reflect a specific set of conservative assumptions in which the entire Project would be built out over a 9-year time period consisting of 3 phases.

(ii) Localized Construction Impacts

The SCAQMD has developed a set of mass emissions rate look-up tables that can be used to evaluate localized impacts that may result from construction-period emissions. If the on-site emissions from proposed construction activities are below the LST emission levels found in the LST mass rate look-up tables for the Project site's Source Receptor Area (SRA), then project emissions would not have potential to cause a significant localized air quality impact. The thresholds are based on several factors including the size of the project construction site, distance from construction site to sensitive receptor locations, and local meteorological conditions. The thresholds for SRA Number 1 (Central Los Angeles), which represents conditions for the general project vicinity, are shown in Table 57.

Following the LST methodology, the conservative estimate of maximum on-site daily emissions for CO, NO_x, and PM₁₀ was compiled for each of the individual construction site locations and compared to the applicable screening threshold based on construction site acreage and distance to closest sensitive receptor. Individual construction projects that are expected to occur simultaneously and are adjacent to one another were considered collectively as well as individually.

Table 57

Conservative Estimate of Emissions During Construction^a
(lbs/day)

Regional Analysis	VOC	NO_x	CO	SO_x	PM₁₀^b
Total Emissions (On-site and off-site)					
Parcel Q	119	851	479	<1	179
Parcel L and M-2	55	550	401	<1	170
Parcel W-1/W-2	175	404	375	<1	127
Accelerated Scenario ^c	148	1,039	785	<1	179
Maximum Net Emissions During Construction	175	1,039	785	<1	179
SCAQMD Daily Significance Threshold	75	100	550	150	150
Over (Under)	100	939	235	(149)	29
Significant?	Yes	Yes	Yes	No	Yes
Local Analysis					
(On-site Emissions Only)					
Parcel Q	108	348	381	<1	170
Parcel L and M-2	52	249	336	<1	164
Parcel W-1/W-2	171	250	336	<1	124
Accelerated Scenario ^c	171	348	387	<1	170
Maximum On-Site Estimate Total	171	348	387	<1	170
Localized Significance Threshold ^d	—	238	1,268	—	16
Over (Under) Threshold	—	110	(881)	—	154
Exceed Threshold?	N/A	Yes	No	N/A	Yes

^a Emission quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the URBEMIS model printout sheets and/or calculation worksheets that are presented in Appendix D.

^b PM₁₀ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the site boundaries. A copy of SCAQMD Rule 403 is included in Appendix D.

^c Represents combined emissions resulting from overlapping construction activities on Parcel Q and Parcel L and M-2.

^d These localized thresholds were provided in the SCAQMD Localized Significance Thresholds Methodology guidance document based on the following: (1) the proposed Project site is located in SCAQMD Sensitive Source Receptor Area (SRA) No. 1, (2) all sensitive receptors are located more than 25 meters (82 feet) away from major construction activity, and (3) all parcels are within the 5 acre size category. Localized thresholds exist for NO_x, CO, and PM₁₀ only.

Source: PCR Services Corporation, 2006. Construction emission calculation worksheets are included in Appendix D of this EIR.

As shown in Table 57, localized CO emissions would not exceed the applicable LST threshold for any of the construction phases. However, localized NO_x and PM₁₀ emissions would exceed their applicable LST screening thresholds and, thus, localized PM₁₀ and NO₂ impacts during short-term construction activities at areas in close proximity to the Project's

construction sites would be significant. While PM₁₀ and NO₂ concentrations during construction would exceed the SCAQMD localized significance thresholds, the potential for this impact would be short-term and would not have a long-term impact on the region's ability to meet State and federal air quality standards.

(iii) Toxic Air Contaminants

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Although Project construction would occur for a much shorter duration than 70 years, the anticipated construction duration can be factored into the overall 70-year lifetime risk (e.g., a nine-year duration would be approximately 13 percent of the predicted cancer risk over a 70-year exposure duration). Based on this methodology, an assessment of diesel particulate emissions was conducted to determine the potential risk of a nine-year duration of Project construction and using the same assumptions used for the localized analysis discussed above. As such, this analysis includes all diesel exhaust emissions associated with on-site heavy equipment and haul trucks during the construction period. The results of this analysis yields a maximum offsite individual cancer risk of less than one in a million at the Colburn School of Performing Arts. As the Project would not emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million, Project-related toxic emission impacts would be less than significant.

(iv) Odors

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents and to a lesser extent diesel exhaust. Properly tuned equipment and vehicles would minimize the potential for diesel exhaust emissions that would create objectionable odors. In addition, SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. With mandatory compliance with SCAQMD Rules, no proposed construction activities or materials would create objectionable odors. Therefore, no impact would occur and no mitigation measures would be required.

(b) Operational Impacts**(i) Regional Operations Impacts**

Regional air pollutant emissions associated with proposed Project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions. Electricity is considered an area source since it is produced at various locations within, as well as outside of, the Basin. Since it is not possible to isolate where electricity is produced, these emissions are conservatively considered to occur within the Basin and are regional in nature. Criteria pollutant emissions associated with the production and consumption of electricity were calculated using emission factors from the SCAQMD's CEQA Air Quality Handbook (Appendix to Chapter 9).

Criteria pollutant emissions associated with natural gas combustion and other miscellaneous emissions were estimated using the URBEMIS 2002 emissions inventory model, which utilizes emission factors developed by the EPA and ARB to calculate emissions based on the type of land uses. On-site stationary sources would include chillers, boilers, and emergency generators. Any boilers (used for water and space heating) would be natural gas-fired. Criteria pollutant emissions associated with natural gas combustion were calculated using the URBEMIS 2002 emissions inventory model. These stationary sources (i.e., boilers) may require permits from the SCAQMD pursuant to Rules 201, 202, and 203. Emission increases related to those sources may be subject to SCAQMD Regulation XIII or Regulation XXX which, among other things, requires that Best Available Control Technology (BACT) be utilized to reduce pollutants and that any increases of criteria air pollutants from these types of stationary sources be offset by achieving equivalent emission reductions at a facility within the Basin.

Emissions for miscellaneous area sources were estimated to account for minor sources of criteria pollutants. Miscellaneous sources include, but are not limited to, consumer/commercial solvents, landscaping equipment, and architectural coatings. These sources may not individually emit large quantities of criteria pollutants but when combined emit quantitative amounts of criteria pollutants.

Mobile-source emissions were calculated using the URBEMIS 2002 emissions inventory model, which multiplies an estimate of daily vehicle miles traveled (VMT) by applicable EMFAC 2002 emissions factors. The URBEMIS 2002 model output and worksheets for calculating regional operational daily emissions are provided in Appendix D of this Draft EIR. As shown in Table 58 on page 543, regional emissions resulting from the proposed Project would not exceed regional SCAQMD thresholds for SO_x. However, the proposed Project would

Table 58

**Project with County Office Building Option Maximum Operational Emissions
(Pounds per Day)**

Emission Source	CO	NO_x	PM₁₀	VOC	SO_x
Parcel Q					
Mobile	431	52	94	45	<1
Area	12	12	<1	39	<1
Parcel L and M-2					
Mobile	238	28	51	27	<1
Area	6	12	<1	57	<1
Parcel W-1/W-2					
Mobile	288	35	63	35	<1
Area	10	14	<1	58	<1
Total Stationary (Electricity)	18	102	4	<1	11
Project Emissions					
Mobile	958	115	209	107	1
Area	45	141	5	155	11
Total Net	1,004	257	214	263	12
SCAQMD Significance Threshold	550	55	150	55	150
Difference	454	202	64	208	(138)
Significant?	Yes	Yes	Yes	Yes	No

^a Mobile emissions calculated using the URBEMIS2002 emissions model. Model output sheets are provided in Appendix D.

^b Area sources include landscape fuel consumption, residential consumer products and miscellaneous sources (e.g., among other things, commercial solvent usage (e.g., detergents, cleaning compounds, glues, polishes, and floor finishes), delivery and loading dock equipment.) Worksheets are provided in Appendix D.

^c Emissions due to Project-related electricity generation and natural gas consumption, calculated based on guidance provided in the SCAQMD CEQA Air Quality Handbook. Worksheets are provided in Appendix D.

Source: PCR Services Corporation, 2006.

exceed regional SCAQMD thresholds for VOC, CO, NO_x and PM₁₀ and impacts associated with these criteria pollutants would be significant.

(ii) Local Impacts

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by 2 percent or more at intersections with a level of service (LOS) of C or worse. As detailed in Section IV.B, Traffic, Circulation, and Parking, Project traffic volumes would meet these criteria at 19 intersections. Sensitive receptors located within proximity to the analyzed intersections include the following: Central Area Performing

Arts Senior High School (currently under construction); Colburn School of Performing Arts; Angelus Plaza; Promenade Plaza; and the proposed housing development on Fourth and Hill Streets. Intersections were selected for analysis based on information provided in the Project's Traffic Study, (see Appendix B of the Draft EIR for the complete traffic study).

CO concentration levels were forecasted at the above-mentioned intersections using the CALINE4 dispersion model developed by the California Department of Transportation, using peak-hour traffic volumes and conservative meteorological assumptions. Conservative meteorological conditions include low wind speed, stable atmospheric conditions, and the wind angle producing the highest CO concentrations for each case. CO concentrations were modeled under the future (2015) No Project and with Project conditions. As shown in Table 59 on page 545, Project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at these 19 intersection locations. Since a significant impact would not occur at the intersections which operate at the highest V/C ratio, no significant impact would occur at any other analyzed roadway intersections as a result of Project-generated traffic volumes. Thus, the proposed Project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

Potential localized impacts from Project-related stationary source operational emissions are anticipated to be minimal, since the proposed Project does not include any industrial, manufacturing or similar types of facilities (e.g., power plants, landfills, concrete batch plants, and warehouse/distribution facilities) wherein large stationary combustion equipment would be located. Potential stationary combustion equipment that may occur within the Project site would include emergency generators and equipment used to off-load deliveries in support of the Project's high-rise buildings (e.g., forklift). All on-site stationary sources that have the potential to generate substantial air quality emissions would be subject to SCAQMD Regulation XIII (New Source Review) and as such, would be equipped with best available control technology (BACT). With regard to the off-loading of deliveries, idling trucks and forklift emissions would be a minor source of emissions as it is anticipated that only a few deliveries would be made to the high-rise buildings on a daily basis as opposed to a potentially significant source such as a warehouse/distribution facility where hundreds of deliveries would occur on a daily basis.

While no stationary sources of the type described above are anticipated to locate within the Project site, any new stationary sources would be required to comply with SCAQMD Rule XIII and through air quality modeling demonstrate compliance with SCAMD Localized Significance Thresholds for CO, NO₂, and PM₁₀. Therefore, Project-related stationary source combustion equipment emissions would result in a less than significant impact.

Table 59

Project with County Office Building Option Local Area Carbon Monoxide Dispersion Analysis

Intersection	Peak Period ^a	Maximum 1-Hour 2015 Base Concentration ^b (ppm)	Maximum 1-Hour 2015 w/ Project Concentration ^c (ppm)	Significant 1-Hour Impact ^d	Maximum 8-Hour 2015 Base Concentration ^e (ppm)	Maximum 8-Hour 2015 w/ Project Concentration ^f (ppm)	Significant 8-Hour Impact ^d
Grand Avenue and 110/101 Ramps	AM	6.3	6.3	NO	5.2	5.2	NO
	PM	6.1	6.2	NO	5.2	5.2	NO
Grand Avenue and Temple Street	AM	6.8	6.7	NO	5.4	5.4	NO
	PM	6.7	6.9	NO	5.4	5.5	NO
Hope Street and First Street	AM	6.8	6.9	NO	5.4	5.4	NO
	PM	6.6	6.7	NO	5.4	5.4	NO
Hope Street and Gtk Way / Second Place	AM	5.7	5.8	NO	4.9	5.0	NO
	PM	6.5	6.6	NO	5.2	5.3	NO
Hope Street and Temple Street	AM	6.3	6.3	NO	5.2	5.2	NO
	PM	6.4	6.5	NO	5.3	5.3	NO
Grand Avenue and First Street	AM	6.8	6.9	NO	5.4	5.4	NO
	PM	6.7	6.9	NO	5.5	5.6	NO
Hill Street and Temple Street	AM	6.5	6.6	NO	5.4	5.4	NO
	PM	6.8	6.8	NO	5.4	5.4	NO
Olive Street and First Street	AM	6.4	6.5	NO	5.3	5.4	NO
	PM	6.6	7.0	NO	5.4	5.6	NO
Olive Street and Fourth Street	AM	6.1	6.2	NO	5.2	5.2	NO
	PM	6.3	6.5	NO	5.3	5.4	NO
Olive Street and Fifth Street	AM	6.1	6.1	NO	5.2	5.2	NO
	PM	6.4	6.6	NO	5.4	5.4	NO
Broadway and Temple Street	AM	6.5	6.6	NO	5.4	5.4	NO
	PM	6.5	6.6	NO	5.4	5.4	NO
Hill Street and First Street	AM	6.5	6.8	NO	5.4	5.4	NO
	PM	6.7	6.8	NO	5.4	5.5	NO
Hill Street and Second Street	AM	6.5	6.6	NO	5.3	5.4	NO
	PM	6.4	6.5	NO	5.3	5.4	NO

Table 59 (Continued)

Project with County Office Building Option Local Area Carbon Monoxide Dispersion Analysis

Intersection	Peak Period ^a	Maximum 1-Hour 2015 Base Concentration ^b (ppm)	Maximum 1-Hour 2015 w/ Project Concentration ^c (ppm)	Significant 1-Hour Impact ^d	Maximum 8-Hour 2015 Base Concentration ^e (ppm)	Maximum 8-Hour 2015 w/ Project Concentration ^f (ppm)	Significant 8-Hour Impact ^d
Hill Street and Third Street	AM	7.0	7.2	NO	5.6	5.7	NO
	PM	7.2	7.4	NO	5.7	5.7	NO
Hill Street and Fourth Street	AM	6.3	6.3	NO	5.2	5.3	NO
	PM	6.5	6.6	NO	5.4	5.4	NO
Broadway and First Street	AM	6.4	6.5	NO	5.4	5.4	NO
	PM	6.6	6.7	NO	5.4	5.5	NO
Broadway and Second Street	AM	6.1	6.1	NO	5.2	5.2	NO
	PM	6.4	6.4	NO	5.3	5.3	NO
Figueroa Street and Third Street	AM	6.8	6.9	NO	5.7	5.7	NO
	PM	7.7	7.8	NO	6.0	6.1	NO
Grand Avenue and Upper Second Street	AM	6.1	6.2	NO	5.1	5.1	NO
	PM	5.9	6.1	NO	5.0	5.1	NO

ppm = parts per million.

^a Peak hour traffic volumes are based on the Traffic Impact Study prepared for the Project by The Mobility Group, 2006.

^b SCAQMD 2015 1-hour ambient background concentration (5.1 ppm) + 2015 Base traffic CO 1-hour contribution.

^c SCAQMD 2015 1-hour ambient background concentration (5.1 ppm) + 2015 w/ Project traffic CO 1-hour contribution.

^d Determination based on comparison to the more restrictive State of California standards. The standards for 1-hour CO concentrations are 20 ppm and for 8-hour concentrations is 9.0 ppm.

^e SCAQMD 2015 8-hour ambient background concentration (3.9 ppm) + 2015 Base traffic CO 8-hour contribution.

^f SCAQMD 2015 8-hour ambient background concentration (3.9 ppm) + 2015 w/ Project traffic CO 8-hour contribution.

Source: PCR Services Corporation, 2006; emission factor and dispersion modeling output sheets are provided in Appendix D.

(iii) Regional Concurrent Construction and Operation Impacts

The potential exists that the later stages of Project construction could occur concurrently with the occupancy of the earlier stages of development. Therefore, emissions associated with concurrent construction and operation activities were calculated. It was determined that concurrent emissions would be their greatest in the latter stages of Project construction, wherein the Proposed Project would nearly be built-out, but some construction activities would still be occurring as well as the Project's proposed off-site roadway improvements. As summarized in Table 60 on page 548, concurrent construction and operational emissions would exceed SCAQMD daily thresholds for CO, NO_x, PM₁₀, and VOC, but would not exceed the SCAQMD daily threshold for SO_x. Thus, a significant regional air quality impact would occur.

(iv) Toxic Air Contaminants

This section evaluates potential impacts to neighboring properties that may result from TAC emissions associated with long-term operation of the Project. However, the ambient air environment that currently exists on and around the Project site would also impact the residential uses that would be developed as part of the proposed Project. Based on ARB siting recommendations, sensitive receptors (e.g., residential uses) should not be sited within 1,000 feet of a warehouse distribution center (which have extensive heavy-duty truck activity), within 500 feet of a freeway (or similar high traffic roadway (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day), or within 300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations.¹²⁹ As shown in Figure 43 on page 530, proposed residential uses would be located at least 1,300 feet from the Harbor Freeway and approximately 1,500 feet from the Hollywood Freeway. In addition, site reconnaissance was conducted on March 26, 2006 to confirm that ARB identified air toxic sources are not located within the recommended ARB siting distances. Since the Project site is not located sufficiently proximate to the identified sources, the siting of residential uses on the Project site would not result in a significant impact with regard to the exposure of on-site residents to the TAC emission sources identified in ARB's siting recommendations (i.e., the Project would not site residential uses in a high cancer risk area due to ambient air quality).

The primary source of potential air toxics associated with proposed Project operations include diesel PM₁₀ from delivery trucks (e.g., truck traffic on local streets and on-site truck idling) and emergency backup generators. The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel PM (e.g., truck stops and warehouse

¹²⁹ CARB, *Air Quality and Land Use Handbook*, April 2005.

Table 60

**Project with County Office Building Option
Concurrent Operation and Construction Emissions
(Pounds per day)**

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀
Operations-period Daily Emissions ^a	205	214	1,121	7	149
Construction-period Daily Emissions ^b	48	404	375	<1	127
Total Emissions	253	618	1496	8	276
SCAQMD Construction Significance Threshold	75	100	550	150	150
Over (Under)	178	518	946	(142)	126
Significant?	Yes	Yes	Yes	No	Yes
SCAQMD Operation Significance Threshold	55	55	550	150	150
Over (Under)	198	563	946	(142)	126
Significant?	Yes	Yes	Yes	No	Yes

^a For purposes of this analysis, assumes completion and occupancy of Parcel Q and Parcel L and M-2.

^b For purposes of this assumption, assumes maximum emissions attributable to construction activity related to Parcel W-1/W-2.

Source: PCR Services Corporation, 2006.

distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.¹³⁰ The proposed Project operations would not be considered a substantial source of diesel PM, thus, a significant regional air quality impact would not occur.

Typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The proposed Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products. As such, the proposed Project would not release substantial amounts of toxic contaminants, and no significant impacts on human health would occur. Based on the limited activity of the toxic air contaminant sources, the proposed Project does not warrant the need for a health risk assessment, and potential air toxic impacts would be less than significant.

(v) Odors

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The

¹³⁰ SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

proposed Project does not include any uses identified by the SCAQMD as being associated with odors. As the residential activities would not be a source of odors, potential odor impacts would be less than significant. Furthermore, any potential sources of odors within the Project site would be required to comply with SCAQMD Rule 402, which controls nuisance odors, as well as complying with Los Angeles Department of Building and Safety regulations which address air filtration, which would also address Project generated odors.

(vi) SCAQMD Handbook Policy Analysis

In accordance with the procedures established in the SCAQMD CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the proposed Project's consistency with SCAQMD and SCAG policies:

1. Will the Project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Will the Project exceed the assumptions utilized in preparing the AQMP?

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for projects such as the proposed Project include forecasts of Project emissions in a regional context during Project occupancy. This forecast is provided earlier in this section. Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of the proposed Project's pollutant emissions on localized pollutant concentrations is used as the basis for evaluating Project consistency.

CO is the preferred pollutant for assessing local area air quality impacts from motor vehicle operations. Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts that can indicate whether the proposed Project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the Project site. As indicated earlier, CO emissions were analyzed using the CALINE 4 model. No violations of the State and federal carbon monoxide standards are projected to occur.

Potential localized impacts from Project-related stationary source operational emissions are anticipated to be minimal, since the proposed Project does not include any industrial, manufacturing or similar types of facilities (e.g., power plants, landfills, concrete batch plants, and warehouse/distribution facilities) wherein large stationary combustion equipment would be located. Potential stationary combustion equipment that may occur within the Project site would include emergency generators and equipment used to off-load deliveries in support of the Project's high-rise buildings (e.g., forklift). All on-site stationary sources that have the potential to generate substantial air quality emissions would be subject to SCAQMD Regulation XIII (New Source Review) and as such, would be equipped with best available control technology (BACT). With regard to the off-loading of deliveries, idling trucks and forklift emissions would be a minor source of emissions as it is anticipated that only a few deliveries would be made to the high-rise buildings on a daily basis as opposed to a potentially significant source such as a warehouse/distribution facility where hundreds of deliveries would occur on a daily basis.

While no stationary sources of the type described above are anticipated to locate within the Project site, any new stationary sources would be required to comply with SCAQMD Rule XIII and through air quality modeling demonstrate compliance with AAQS. Therefore, Project-related stationary source combustion equipment emissions would result in a less-than-significant impact.

While PM_{10} and NO_2 concentrations during construction would exceed the SCAQMD $10.4 \mu\text{g}/\text{m}^3$ significance threshold, the potential for this impact would be short-term and would not have a long-term impact on the region's ability to meet State and federal air quality standards. As such, the proposed Project would meet the first AQMP consistency criterion.

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it must be recognized that air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed Project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP.

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with the population, housing and employment growth projections; (2) Project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis of each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions which were used in the development of the AQMP. The 2003 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates, in part, SCAG's 2004 Regional Transportation Plan (RTP) socioeconomic forecast projections of regional population and employment growth.

SCAG's 2004 RTP projects that employment in the Los Angeles City Subregion, the SCAG subregion within which the Project site is located, will grow by over 222,000 jobs between 2006 and 2015. The proposed Project is projected to result in a net increase of approximately 3,930 jobs on the Project Site, or approximately 1.8 percent of the total job growth projected for the subregion. SCAG's 2004 RTP projects that population in the subregion will grow by over 176,000 people between 2006 and 2015. The proposed Project is projected to result in an increase of approximately 2,925 residents on the Project site, or approximately 1.7 percent of the total population growth projected for the subregion. Such levels of employment and population growth are consistent with the employment forecasts for the subregion as adopted by SCAG. Because the SCAQMD has incorporated these same projections into the AQMP, it can be concluded that the proposed Project would be consistent with the projections in the AQMP.

- Does the project implement all feasible air quality mitigation measures?

Implementation of all feasible mitigation measures is recommended to reduce air quality impacts to the extent feasible. The proposed Project would incorporate a number of key control measures identified by the SCAQMD, as summarized below. As such, the proposed Project meets this AQMP consistency criterion since all feasible mitigation measures would be implemented.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

The proposed Project would serve to implement a number of land use policies of the City of Los Angeles and SCAG. With regard to land use developments, such as the proposed Project, air quality policies focus on the reduction of vehicle trips and vehicles miles traveled. The proposed Project, by virtue of its location and design, exhibits many attributes that have a positive direct and indirect benefit with regard to the reduction of vehicle trips and vehicles miles traveled. The proposed array of residential, retail, and office uses would promote a reduction of mobile source emissions by providing a large supply of housing as well as employment

opportunities within close proximity to one another, making it possible for an individual to both reside and work within the Project site or the general area. In addition, the Project would provide a substantial amount of housing in a jobs-rich subregion. (See Section IV.J, Population, Housing and Employment, for additional information regarding the jobs/housing issue.)

The placement of residential uses in the design of the proposed Project serves the objective of minimizing mobile source pollutant emissions. Residential development would be located in close proximity to Downtown employment areas, rail, light rail, subway, bus services and access ramps of the nearby freeways. Such concentration and placement are intended to reduce vehicle miles traveled within the Project site and within the region and subregion by reducing commute distances for residents in the area. The provision of residential space in close proximity to commercial space, theatres, and other entertainment sources increases the probability that residents may walk or commute to areas of interest or places of business, thus reducing the vehicle miles traveled.

The design of the proposed Project facilitates reductions in pollutant emissions from the arrangement of proposed land uses, as described above, as well as through the promotion of alternative modes of travel such as mass transit, bicycling, and walking. In addition, wider sidewalks along the segment of Grand Avenue proposed for improvement are intended to facilitate and improve pedestrian movement and create a positive environment for sidewalk cafes, special events, and building entrances. To further enhance the pedestrian experience, street furnishings would be consistent with the modern identity of Grand Avenue with the explicit intent of improving the street environment.

The proposed Project is found to be consistent with the AQMP because the proposed Project: (1) does not cause or worsen an exceedance of an ambient air quality standard; (2) does not delay the attainment of an air quality standard; (3) is consistent with the AQMP's growth projections; and (4) implements all feasible air quality mitigation measures and is consistent with the AQMP's land use policies.

City of Los Angeles Policies

The City of Los Angeles General Plan was prepared in response to California state law requiring that each city and county adopt a long-term comprehensive general plan. This plan must be integrated, internally consistent, and present goals, objectives, policies, and implementation guidelines for decision-makers to use. The City has included an Air Quality Element as part of its General Plan. The planning area for the City's Air Quality Element covers the entire City of Los Angeles, which encompasses an area of about 465 square miles.

The 1992 revision of the City's General Plan Air Quality Element serves to aid the greater Los Angeles region in attaining the state and federal ambient air quality standards at the earliest feasible date, while still maintaining economic growth and improving the quality of life. The City's Air Quality Element and the accompanying Clean Air Program acknowledges the inter-relationships between transportation and land use planning in meeting the City's mobility and clean air goals. With the City's adoption of the Air Quality Element and the accompanying Clean Air Program, the City is seeking to achieve consistency with regional Air Quality, Growth Management, Mobility, and Congestion Management Plans.

To achieve these goals, performance based standards have been adopted to provide flexibility in implementation of the policies and objectives, of the City's Air Quality Element. The following City Air Quality Element goals, objectives and policies are relevant to the Proposed Project:

Goal 2—Less reliance on single occupant vehicles with fewer commute and non-work trips.

Objective 2.1—It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Goal 4—Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1—Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Objective 4.2—It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.2—Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

As discussed in detail above, development of the proposed Project at the proposed site location offers the opportunity to redevelop an underutilized site with a mixed-use development within the middle of a highly urbanized regional employment center and does so from the use of

existing infrastructure, proximity to existing regional and local transit facilities, encourages pedestrian activity, and is located near existing commercial uses that would meet many of the needs of the Project's future residents. Based upon this evaluation, it is concluded that the proposed Project would be consistent with City of Los Angeles air quality policies as it implements the air quality goals and policies set forth in the City's General Plan. Overall, no significant impacts would occur as a result of Project development with respect to compatibility with applicable air quality policies as set forth in the City's General Plan Air Quality Element.

(2) Project with Additional Residential Development Option

(a) Construction

The Project with Additional Residential Development Option would increase the amount of housing space while decreasing the amount of office space. The construction program would be substantially similar to that of the Project with County Office Building Option, and like the Project with County Office Building Option would generate temporary regional construction impacts for VOC, NO_x, and CO and localized NO₂ and PM₁₀ impacts. Therefore, temporary construction impacts would be significant.

(b) Operation

The Project with Additional Residential Development Option would, like the Project with County Office Building Option include a mix of housing/residential uses and employee generating uses. However, the number of residential units would be increased, and the office space would be removed. The resulting development would include 2,660 residential units. This is an increase of 600 residential units in total and a reduction of 681,000 square feet of office space. The resultant trip generation rate would decrease as a result of the change in land use from office to residential. Also, the vehicle trip lengths and area source emissions would be different with this change in land use. The change in regional emissions generated under this option is shown in Table 61 on page 555. As shown in Table 61, with the exception of VOC, pollutant emissions would decrease. While VOC emissions do increase slightly, ozone precursors (i.e., VOC and NO_x) emissions would be slightly less than the Proposed Project. Regardless, the Project with Additional Residential Development Option similar to the Project with County Office Building Option would exceed regional SCAQMD thresholds for VOC, CO, NO_x and PM₁₀ and impacts associated with these criteria pollutants would be significant. Regarding localized CO impacts, since the trip generation and traffic volumes would decrease under the Project with Additional Residential Development Option, and the distribution of trips would be similar to the Project with County Office Building Option, as with the Project with County Office Building Option, no localized CO impacts would occur, as is the case with the Project with County Office Building Option. With the addition of 600 more residential units, it would only further enhance the City's goal of improving the accessibility for the City's residents to places of employment, shopping centers, and other establishments. Thus, the Project with

Table 61

**Project with Additional Residential Development Option
Maximum Operational Emissions
(Pounds per Day)**

Emission Source	CO	NO_x	PM₁₀	VOC	SO_x
Mobile ^a	932	112	202	105	1
Area ^b	25	42	1	184	<1
Stationary ^c	15	85	3	1	9
Total	973	240	207	290	11
SCAQMD Significance Threshold	550	55	150	55	150
Difference	423	185	57	235	-139
Significant?	Yes	Yes	Yes	Yes	No
Comparison to Project with County Office Building Option					
Project with Additional Residential Development Option	973	240	207	290	11
Project with County Office Building Option	1004	257	214	263	12
Difference	(31)	(17)	(7)	27	(1)
	-3%	-7%	-3%	+10%	-8%

^a Mobile emissions calculated using the URBEMIS2002 emissions model. Model output sheets are provided in Appendix D.

^b Area sources include landscape fuel consumption, residential consumer products and miscellaneous sources (e.g., among other things, commercial solvent usage (e.g., detergents, cleaning compounds, glues, polishes, and floor finishes), delivery and loading dock equipment.) Worksheets are provided in Appendix D.

^c Emissions due to electricity generation and natural gas consumption, calculated based on guidance provided in the SCAQMD CEQA Air Quality Handbook. Worksheets are provided in Appendix D.

Source: PCR Services Corporation, 2006.

Additional Residential Development Option would also be consistent with both the AQMP and City of Los Angeles goals and policies.

4. CUMULATIVE IMPACTS

a. Construction

Of the 93 related projects that have been identified within the proposed Project study area, there are a number of related projects that have not yet been built or are currently under construction. Since Related Companies has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be entirely speculative. For this reason, the

SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impacts methodology employed elsewhere in this EIR.

With respect to the Project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal Clean Air Act mandates. As such, the Project with County Office Building Option would comply with SCAQMD Rule 403 requirements, and implement all feasible mitigation measures. In addition, the Project with County Office Building Option would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, which would include each of the related projects mentioned above. Nevertheless, construction-period CO, NO_x and VOC mass regional emissions, and localized NO₂ and PM₁₀ emissions associated with the Project with County Office Building Option are already projected to result in a significant impact to air quality. As such, cumulative impacts to air quality during Project with County Office Building Option construction would also be significant and unavoidable.

Similar to the Project with County Office Building Option, the greatest potential for TAC emissions at each related project would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given that the Project with County Office Building Option contribution to cancer risk from construction activities would be less than significant and is a localized impact, related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. Furthermore, any related project that has the potential to emit notable quantities of TACs would be regulated by the SCAQMD rules and regulations (e.g., SCAQMD Rule 1401, New Source Review of Toxic Air Contaminants) such that TAC emissions would be negligible. Thus, TAC emissions from the related projects are anticipated to be less than significant unto themselves, as well as cumulatively in conjunction with the Project with County Office Building Option.

Also similar to the Project with County Office Building Option, potential sources that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Mandatory compliance with SCAQMD Rules would ensure that construction activities or materials used in the construction of the related

projects would not create objectionable odors. Thus, odor impacts from the related projects are anticipated to be less than significant unto themselves, as well as cumulatively in conjunction with the Project with County Office Building Option.

b. Operation

The SCAQMD has set forth both a methodological framework as well as significance thresholds for the assessment of a project's cumulative operational air quality impacts. The SCAQMD's methodology differs from the cumulative impacts methodology employed elsewhere in this Draft EIR, in which foreseeable future development within a given service boundary or geographical area is predicted and associated impacts measured. The SCAQMD's approach for assessing cumulative impacts is based on the SCAQMD's AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. This forecast also takes into account SCAG's forecasted future regional growth. As such, the analysis of cumulative impacts focuses on determining whether the Project with County Office Building Option is consistent with forecasted future regional growth. Therefore, if all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur.

Based on the SCAQMD's methodology (presented in Chapter 9 of the *CEQA Air Quality Handbook*), a project would have a significant cumulative air quality impact if the ratio of daily on-site employee vehicle miles traveled (VMT) to daily countywide vehicle miles traveled exceeds the ratio of daily Project employees to daily countywide employees. A significant cumulative air quality impact would also occur if the ratio of the daily vehicle miles traveled (VMT) by the on-site population to daily countywide vehicle miles traveled exceeds the ratio of on-site population to the countywide population. As shown in Table 62 on page 558, the daily on-site to countywide VMT ratios are not greater than the on-site to countywide employee or population ratios. Based on these criteria, development of the proposed Project would have a less than significant air quality impact. In addition, as shown in Table 62, a localized CO impact analysis was conducted for cumulative traffic (i.e., related projects and ambient growth through 2015) in which no local CO violations would occur at any of the studied intersections.

With respect to air quality policies in the City's General Plan, it is anticipated that the identified related projects within the City of Los Angeles are subject to compliance with City regulations and subject to review by the City for compliance with the General Plan and its zoning regulations. It is reasonable to assume that future projects approved in the surrounding area would have been found, as part of their respective approval processes, to be in compliance with local and regional planning goals and policies. If a related project was found to be in conflict with applicable air quality policies and regulations, it is reasonable to assume that its approval would involve findings that the related development did not have adverse air quality impacts or

Table 62

Project Cumulative Air Quality Impacts ^a

Daily Vehicle Miles Traveled for Proposed Project Population	49,543
Daily Vehicle Miles Traveled Countywide ^b	225,794,000
Daily Vehicle Miles Traveled Ratio	0.00021942
Proposed Project Population ^c	3,777
Countywide Population ^d	11,027,118
Population Ratio	0.00034
Significance Test—Daily Vehicle Miles Traveled Ratio Greater Than Population Ratio	No
Daily Vehicle Miles Traveled for Proposed Project Employment	13,141
Daily Vehicle Miles Traveled Countywide ^b	225,794,000
Daily Vehicle Miles Traveled Ratio	0.000058
Proposed Project Employment ^c	3,930
Countywide Employment ^d	5,087,012
Employment Ratio	0.001
Significance Test—Daily Vehicle Miles Traveled Ratio Greater Than Employment Ratio	No

^a To provide a conservative analysis, the analysis relative to population is based on the Project with Additional Residential Development Option as this option has a greater residential population. Conversely, the analysis relative to employment is based on the Project with County Office Building Option, as this option has a greater employment total. Data based on trip data provided by The Mobility Group and data obtained from URBEMIS 2002.

^b Project population assumes the Project with Additional Residential Option which maximizes the residential population

^c CARB, *Emfac2002*, V2.2. (Buildout Year = 2015)

^d Data obtained from SCAG's *Regional Transportation Plan, 2004*

^e Project employment assumes the Project with County Office Building Option which maximizes the Project's employment population.

Source: PCR Services Corporation, 2006.

that mitigation measures were incorporated into the development to reduce potential air quality impacts to less than significant levels. As discussed previously, the Project with County Office Building Option would be compatible with City air quality policies. Thus, cumulative impacts with regard to consistency with applicable air quality policies would be less than significant.

Despite these conclusions, the Project with County Office Building Option is more conservatively concluded to contribute to a significant cumulative regional air quality impact as the Basin is non-attainment for ozone and PM₁₀, and the Project with County Office Building

Option would exceed the SCAQMD daily significance thresholds for VOC and NO_x emissions (i.e., ozone precursors) and PM₁₀.¹³¹

With respect to TAC emissions, neither the Project with County Office Building Option nor any of the related projects (which are largely residential, restaurant, retail/commercial, and medical/research developments) would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing and transportation hub facilities. However, the Project with County Office Building Option and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, etc. Pursuant to California Assembly Bill 1807, which directs the California Air Resources Board (ARB) to identify substances as TAC and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. In addition, the Project with County Office Building Option would not result in any TAC land uses requiring further evaluation using ARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. As such, cumulative TAC emissions during long-term operations would be less than significant.

With respect to potential odor impacts, neither the Project with County Office Building Option land use nor any of the related projects (which are primarily hospital/medical office, general office, residential, retail, and restaurant uses) land uses have a high potential to generate odor impacts.¹³² Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement Best Available Control Technology to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant unto themselves, as well as cumulatively, in conjunction with the Project with County Office Building Option.

5. MITIGATION MEASURES

Mitigation Measures are proposed below to reduce the Project's potentially significant air quality impacts. In addition to these measures, the Project would comply with regulatory measures and provide project design features which further reduce the Project's less than significant impacts. These measures are listed separately below.

¹³¹ This approach is more conservative than the approach provided in the SCAQMD CEQA Air Quality Handbook.

¹³² According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

Mitigation Measures

Mitigation Measure F-1: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.¹³³ The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with SCAQMD Rule 403 during construction with regard to construction associated with the five development parcels and the Grand Avenue Streetscape Program.. The County's CAO and/or Department of Public Works shall determine compliance with regard to the Civic Park. The SCAQMD shall be responsible for the enforcement for all Project components. Compliance with the provision of Rule 403 would occur through implementation of one or more of the following best management practices (BMPs):

- Water soils daily and not more than 15 minutes prior to earth moving activities;
- Water surfaces two times per day or more in order to maintain a surface crust to prevent soil erosion;
- Apply soil conditioners or vegetative cover to areas that will be exposed for an extended duration;
- Apply chemical stabilizers within five working days of ceasing grading;
- Install of approved trackout prevention devices and provide street sweeping within the Project area;
- Securely cover truck loads with a tarp;
- Cease grading activities when wind speeds exceed 25 miles per hour; and
- Permanently seal exposed surfaces as soon as possible after grading is finished.

Mitigation Measure F-2: During each construction phase, Related, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the

¹³³ SCAQMD Rule 403 requirements are detailed in Appendix D.

five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure if it is not being complied with.

Regulatory Measure F-3: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall comply with SCAQMD Rule 402 to reduce potential nuisance impacts due to odors from construction activities. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure if it is not being complied with.

Mitigation Measure F-4: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all haul truck tires shall be cleaned at the time these vehicles exit the Project site. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure if it is not being complied with.

Mitigation Measure F-5: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all export material carried by haul trucks shall be covered by a tarp or other means. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure if it is not being complied with.

Mitigation Measure F-6: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of

the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-7: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that construction equipment is maintained and operated so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn off their engines, when not in use, to reduce vehicle emissions. Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction activities associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-8: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that electricity rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-9: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction vehicles shall be prohibited from idling in excess of ten minutes, both on- and off-site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-10: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that heavy-duty construction equipment shall use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

b. Operation

Transportation System Management and Demand Management

Mitigation Measure F-11: During Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall, to the extent feasible, ensure that deliveries are scheduled during off-peak traffic periods to encourage the reduction of trips during the most congested periods. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure, with regard to construction associated with the five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-12: During Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall coordinate with the MTA and the City of Los Angeles Department of Transportation to provide information to Project employees, residents and guests with regard to local bus and rail services. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-13: Provide the appropriate number of bicycle racks located at convenient locations in the Project site. Related shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park, under the applicable agreements, shall implement these measures prior to the completion of each construction phase.

The City's Department of Safety shall review and approve the number and location of the bicycle racks with regard to the five development parcels. The County's CAO and/or Department of Public Works shall perform the same function with regard to the Civic Park.

Mitigation Measure F-14: During on-going Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall ensure that all fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed, but a minimum level of lighting should be provided for safety. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this mitigation measure with regard to the five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Project Design Features

Project Design Feature F-1: During site plan review for each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall give consideration to the provision of safe and convenient access to bus stops and public transportation facilities. Pedestrian access plans to bus stops and transit facilities shall be submitted to the Authority, for review and approval. Approved access plans shall be implemented by the responsible parties.

Project Design Feature F-2: Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall provide convenient pedestrian access throughout the Project site. Related shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of these Project components. Pedestrian access plans shall be submitted to the Authority, for review and approval. Approved pedestrian access plans shall be implemented by the responsible parties.

Service and Support Facilities (point sources)

Regulatory Measure

Regulatory Measure F-1: During Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall ensure that all point source facilities shall obtain all required permits from the SCAQMD. The issuance of these permits by the SCAQMD shall require the operators of these facilities to implement Best Available Control Technology and other required measures that reduce emissions of criteria air pollutants. Proof of permit issuance by the SCAQMD shall be provided to the City's Department of Building and Safety, or other appropriate City agency or department, with regard to the five development parcels, and the County's CAO and/or Department of Public Works with regard to the Civic Park. Compliance with point source permits shall be enforced by the SCAQMD for all Project components.

Project Design Features

Project Design Feature F-3: During Project operations, Related, with regard to the five development parcels, shall ensure that commercial businesses located within the Project site shall be limited to those that do not emit high levels of potentially toxic air contaminants or odors (e.g., dry cleaners with on-site processing plants that handle toxic chemicals). The City's Department of Building and Safety, or other appropriate City agency or department, shall be responsible for the enforcement of this measure with regard to the five development parcels.

Natural Gas Consumption and Electricity Production

Regulatory Measure

Regulatory Measure F-2: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall prepare and implement building plans and specifications that ensure that all residential and non-residential buildings shall, at a minimum, meet the California Title 24 Energy Efficiency standards for water heating, space heating and cooling. Approved building plans shall be implemented by Related and the responsible parties. Building plans and specifications with regard to the five development parcels shall be reviewed and approved by the City's Department of Building and Safety, or other appropriate City agency or department. Building plans and specifications with regard to the Civic Park shall be reviewed and approved by the County's CAO and/or Department of Public Works.

Building Materials, Architectural Coatings and Cleaning Solvents

Regulatory Measure

Regulatory Measure F-3: During each construction phase, Related with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall ensure that building materials, architectural coatings and cleaning solvents shall comply with all applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park. The SCAQMD shall be responsible for the enforcement of this measure for all Project components.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

With implementation of the above regulatory measures and mitigation measures, heavy-duty construction equipment emissions of PM₁₀, VOC, NO_x, SO_x, and CO would be reduced by a minimum of 5 percent and fugitive dust emissions would be reduced by an additional 16 percent. However, regional construction activities would still exceed the SCAQMD daily emission thresholds for regional NO_x, CO and VOC after implementation of all feasible mitigation measures. Therefore, construction of the Project would have a significant and unavoidable impact on regional air quality.

With regard to localized emissions, construction activities would still exceed the SCAQMD daily emission threshold for PM₁₀ and NO₂ after implementation of all feasible mitigation measures. Therefore, construction of the Project would have a significant and unavoidable impact.

No notable impacts related to TAC emissions during construction are anticipated to occur for the Project with County Office Building Option. As such, potential impacts would be less than significant.

The Project with County Office Building Option is not anticipated to generate a substantial amount of objectionable odor emissions during construction. Mandatory compliance with SCAQMD Rules would ensure that no proposed construction activities or materials would create objectionable odors. As such, potential impacts would be less than significant.

b. Operation

Regional operational emissions would still exceed the SCAQMD daily emission threshold for regional CO, VOC, PM₁₀, and NO_x after implementation of all feasible mitigation measures. Therefore, operation of the Project would have a significant and unavoidable impact on regional air quality. In addition, regional concurrent construction and operational emissions would still exceed SCAQMD daily thresholds for CO, VOC, PM₁₀, and NO_x after implementation of all feasible mitigation measures. Therefore, concurrent construction and operation of the Project would have a significant and unavoidable impact on regional air quality.

No significant impacts related to local CO concentrations would occur for the Project with County Office Building Option. Project development would be consistent with the air quality policies set forth in the SCAQMD's AQMP and the City of Los Angeles General Plan Air Quality Element, resulting in an impact that is less than significant.

By compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines, potential impacts that could result from any potential odor source would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

G. NOISE

1. INTRODUCTION

The following analysis describes the existing noise and vibration environment within the Project area and evaluates future noise and vibration levels at surrounding land uses due to potential changes brought about by Project construction and operation.

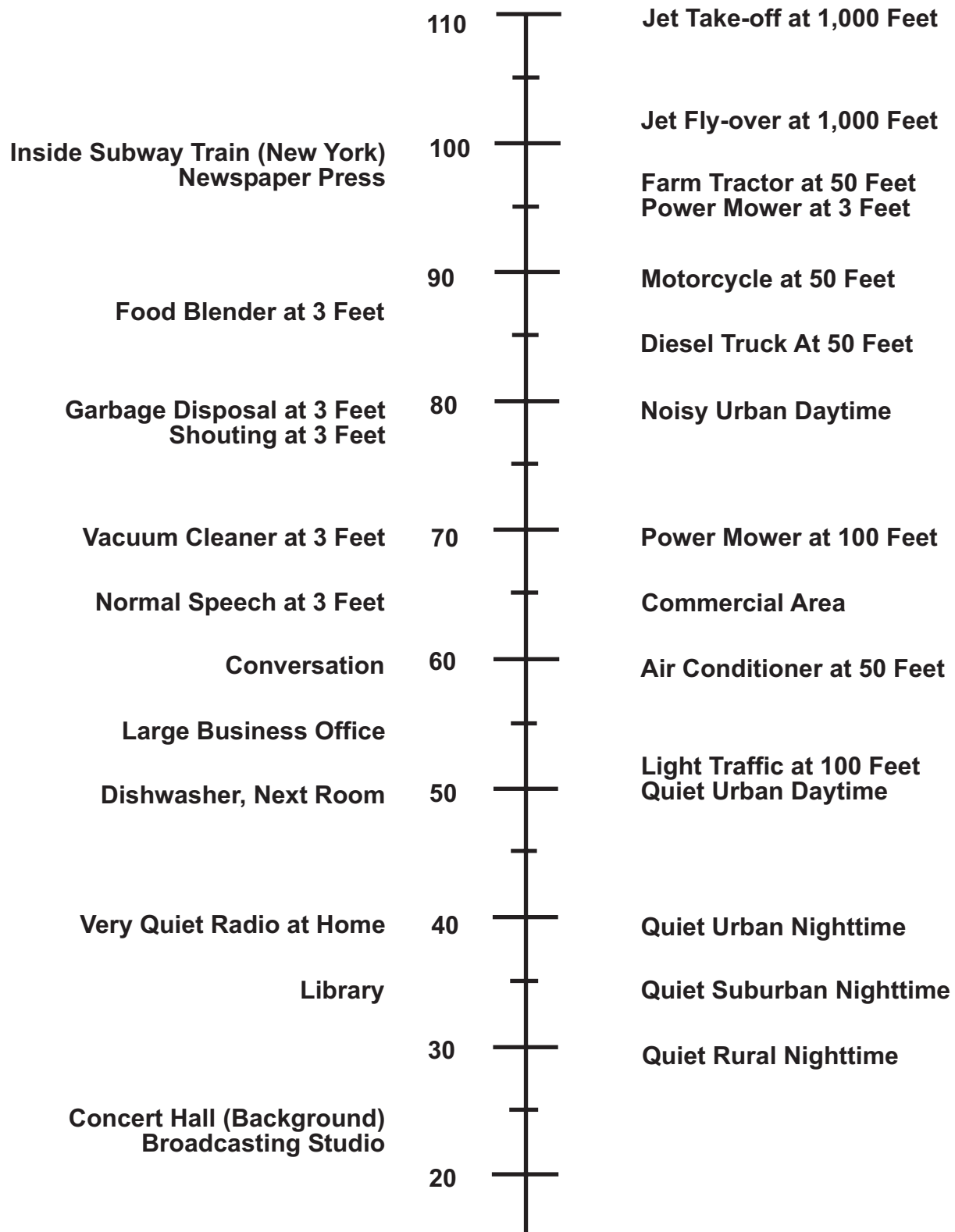
2. ENVIRONMENTAL SETTING

a. Noise and Vibration Basics

(1) Noise

Noise is often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound in subjective terms such as “noisiness” or “loudness.” Sound pressure is measured and quantified using a logarithmic ratio, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted system is used to adjust measured sound levels. The A-weighted sound level is expressed as “dBA.” This scale de-emphasizes low frequencies to which human hearing is less sensitive and focuses on mid- to high-range frequencies. Due to the physical characteristics of noise transmission and reception, an increase of 10 dBA is normally required to achieve a doubling of the “loudness,” as perceived by the human ear. In addition, a 3-dBA increase is recognizable to most people in the context of the community noise environment. A change in noise level will usually not be detectable unless the new noise source is at least as loud as the ambient conditions. Typical A-weighted sound levels measured for various sources, as well as people’s responses to these levels, are provided in Figure 44 on page 569.

Objects that obstruct the line-of-sight between a noise source and a receiver reduce the noise level if the receiver is located within the “shadow” of the obstruction, such as behind a sound wall. This type of sound attenuation is known as “barrier insertion loss.” If a receiver is located behind the wall but still has a view of the source (i.e., line-of-sight not fully blocked),



A-Weighted Decibels



Figure 44
A-Weighted Sound Levels

Source: Compiled by Hodges & Shutt from Various Sources (December 1993)

some barrier insertion loss would still occur, however to a lesser extent. Additionally, a receiver located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receiver, thereby compounding the noise.

Time variation in noise exposure is typically expressed in terms of the average energy over time (L_{eq}), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given period of time. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L_8 and L_{25} represent the noise levels that are exceeded 8 and 25 percent of the time, respectively, or for 5 and 15 minutes during a 1-hour period as well.

Other values typically noted during a noise survey are the L_{min} and L_{max} . These values represent the minimum and maximum noise levels observed during a measurement period. Maximum and minimum noise levels, as compared to the L_{eq} , are a function of the characteristics of the noise source. For example, sources such as compressors, generators, and transformers have maximum and minimum noise levels that are similar to their L_{eq} levels since noise levels for steady-state noise sources do not substantially fluctuate. However, as another example, vehicular noise levels along local roadways result in substantially different minimum and maximum noise levels when compared to the L_{eq} since noise levels fluctuate during pass-by events.

Although the A-weighted scale accounts for the range of people's response, and therefore, is commonly used to quantify individual event or general community sound levels, the degree of annoyance or other response effects also depends on several other perceptibility factors. These factors include:

- Ambient (background) sound level;
- Magnitude of sound event with respect to the background sound level;
- Duration of the sound event;
- Number of event occurrences and their repetitiveness; and
- Time of day that the event occurs.

Several methods have been devised to relate noise exposure over time to human response. A commonly used noise metric for this type of study is the Community Noise Equivalent Level

(CNEL). The CNEL, originally developed for use in the California Airport Noise Regulation, adds a 5 dBA penalty to noise occurring during evening hours from 7:00 P.M. to 10:00 P.M., and a 10 dBA penalty to sounds occurring between the hours of 10:00 P.M. to 7:00 A.M. to account for the increased sensitivity to noise events that occur during the quiet late evening and nighttime periods. Thus, the CNEL noise metric provides a 24-hour average of A-weighted noise levels at a particular location, with an evening and a nighttime adjustment, which reflects increased sensitivity to noise during these times of the day.

(2) Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak of the vibration signal, while RMS is defined as the square root of the average of the squared amplitude of the signal. PPV is typically used for evaluating potential building damage, whereas RMS is typically more suitable for evaluating human response. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 500 feet or less) from the source.

b. Regulatory Framework

Many government agencies have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise and ground-borne vibration. The government agency policies that are relevant to Project construction and operation are discussed below.

(1) Federal Standards and Regulations

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the proposed Project. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

(2) State of California Standards and Regulations

The California Department of Health Services (CDHS) has studied the correlation of noise levels and their effects on various land uses. As a result, the CDHS has established guidelines for evaluating the compatibility of various land uses as a function of community noise

exposure. The State Noise/Land Use Compatibility Matrix is presented in Figure 45 on page 573. Additionally, the California Administrative Code, Title 4, includes guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. Also, Section 65302(f) of the California Government Code requires each community to prepare and adopt a comprehensive long-range general plan for its physical development containing seven mandatory elements, including a noise element. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

(3) Local Standards and Regulations

(a) City General Plan Noise Element


The City of Los Angeles has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City's General Plan Noise Element and the City of Los Angeles' "L.A. CEQA Thresholds Guide" in terms of the CNEL. CNEL guidelines for specific land uses are classified into four categories: (1) "normally acceptable," (2) "conditionally acceptable," (3) "normally unacceptable," and (4) "clearly unacceptable." As shown in Table 63 on page 574, a CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including single-family and multi-family residences and schools.


(b) City of Los Angeles Noise Regulation


The City of Los Angeles Noise Regulation is provided in Chapter 11 of the Los Angeles Municipal Code (LAMC). Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. These procedures recognize and account for perceived differences in the nuisance level of different types of noise and/or noise sources. Specifically, the procedures provide for a penalty of 5 dBA for steady high-pitched noise or repeated impulsive noises to account for the nuisance nature of these types of noise. Conversely, the procedures provide a credit of 5 dBA for noise occurring less than 15 minutes in a period of 60 consecutive minutes during the day, as short-term noise events are typically less of a nuisance than sustained noise levels. The LAMC provides presumed ambient noise levels, where the actual measured ambient conditions are not known or are less than the presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels defined in Section 111.02 of the LAMC. In cases where the actual measured ambient level is not known or is less than 50 dBA, the presumed daytime (7:00 A.M. to 10:00 P.M.)


LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE					
	Ldn or CNEL, dB					
	55	60	65	70	75	80
RESIDENTIAL LOW DENSITY SINGLE FAMILY, DUPLEX,	█	█			█	█
RESIDENTIAL MULTIPLE FAMILY	█	█			█	█
TRANSIENT LODGING- MOTELS, HOTELS	█	█			█	█
SCHOOL, LIBRARIES, PLACES OF WORSHIP, HOSPITALS, NURSING HOMES	█	█			█	█
AUDITORIUMS, CONCERT HALLS, AMPHITHEATERS				█	█	█
OUTDOOR SPECTATOR SPORTS					█	█
PLAYGROUNDS, PARKS, NEIGHBORHOOD PARKS	█	█			█	█
GOLF COURSES, RIDING STABLES, WATER RECREATION, CEMETERIES	█	█			█	█
OFFICE BUILDINGS, BUSINESS, COMMERCIAL AND PROFESSIONAL	█	█			█	█
INDUSTRIAL, MANUFACTURING UTILITIES	█	█			█	█

INTERPRETATION

 **NORMALLY ACCEPTABLE**
Specified land use is satisfactory. Based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

 **CONDITIONALLY ACCEPTABLE**
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

 **NORMALLY UNACCEPTABLE**
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

 **CLEARLY UNACCEPTABLE**
New construction or development should generally not be undertaken.

Source: Guidelines for the Preparation and Content of the Noise Element of the General Plan, California Department of Health Services, in coordination with the office of Planning and Research.



Figure 45
Land Use Compatibility
for Community Noise

Table 63

City of Los Angeles Land Use Compatibility for Community Noise

Land Use	Community Noise Exposure CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family, Duplex, Mobile Homes	50–60	55–70	70–75	Above 70
Multi-Family Homes	50–65	60–70	70–75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50–70	60–70	70–80	Above 80
Transient Lodging—Motels, Hotels	50–65	60–70	70–80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50–70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50–75	—	Above 70
Playgrounds, Neighborhood Parks	50–70	—	67–75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50–75	—	70–80	Above 80
Office Buildings, Business and Professional Commercial	50–70	67–77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50–75	70–80	Above 75	—

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: L.A. CEQA Thresholds Guide, 1998.

minimum ambient noise for properties zoned residential is 50 dBA, while the nighttime (10:00 P.M. to 7:00 A.M.) ambient is 40 dBA.¹³³

Section 112.05 of the LAMC sets a maximum noise level for powered equipment of 75 dBA at a distance of 50 feet therefrom when operated within 500 feet of a residential zone. Compliance with this standard is only required where “technically feasible.”¹³⁴ Section 41.40 of the Municipal Code also prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. In general, the City of Los Angeles Department of Building and Safety enforces noise ordinance provisions relative to equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to: (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, filtering equipment defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) motor vehicles driven on-site as defined in LAMC Section 114.02.

No specific noise thresholds are provided for “general noise,” except for Article 6 of the Noise Regulation, which makes it “unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area.” The Noise Regulation does not provide any definition of “loud” noise.

(4) Federal, State, and Local Government Ground-Borne Vibration Standards

The City of Los Angeles has not adopted policies or guidelines relative to ground-borne vibration. As such, the following is a summary of Los Angeles County, Caltrans, and Federal Transit Administration (FTA) ground-borne vibration policies and guidelines. The Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, but this applies to ground-borne vibrations from long-term operational activities,

¹³³ LAMC, Section 111.03.

¹³⁴ In accordance with the City of Los Angeles Noise Ordinances, “technically feasible” means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

not construction. With respect to ground-borne vibration from construction activities, the FTA and Caltrans have adopted guidelines/recommendations to limit ground-borne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity.

A technical discussion of construction activity-related vibration is provided in Section 12.2 of the FTA publication titled “Transit Noise and Vibration Impacts Assessments,” April 1995. As described therein, a ground-borne vibration level of 0.2 inch-per-second peak particle velocity (PPV) should be considered as damage threshold criterion during construction for structures deemed “fragile,” and a ground-borne vibration level of 0.12 inch-per-second PPV should be considered as the damage criterion for structures deemed “extremely fragile historic.”. With respect to structures that are considered “well engineered,” a ground-borne vibration damage threshold criterion of 2.0 inch-per-second PPV during construction is noted in the Caltrans technical publication titled “Transportation Related Earthborne Vibrations, Caltrans Experience,” July 24, 1992.

c. Existing Local Noise and Ground-borne Vibration Conditions

The predominant noise source within the Project vicinity is roadway noise from local thoroughfares such as the Harbor Freeway (I-110) on the west and the Hollywood/Santa Ana Freeway (I-101) on the north. Other community noise sources include incidental noise from existing commercial and residential uses, ambulance sirens, distant aircraft over-flights, outdoor plazas (theatre patrons and dining areas), and landscaping maintenance activities at nearby commercial and residential uses.

The only sources of ground-borne vibration in the Project vicinity are heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on local roadways and automobile circulation within underground parking facilities. These sources do not guarantee substantial ground-borne vibration levels and, as such, existing ground-borne vibration levels within the Project vicinity are negligible.¹³⁵

(1) Noise-Sensitive Receptors

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. The City’s

¹³⁵ A heavy-duty vehicle traveling at a distance of 50 feet results in a vibration level of approximately 0.001 inches per second RMS, which is less than the Los Angeles County Code (LACC Section 12.08.350) presumed perception threshold of 0.01 inch per second RMS.

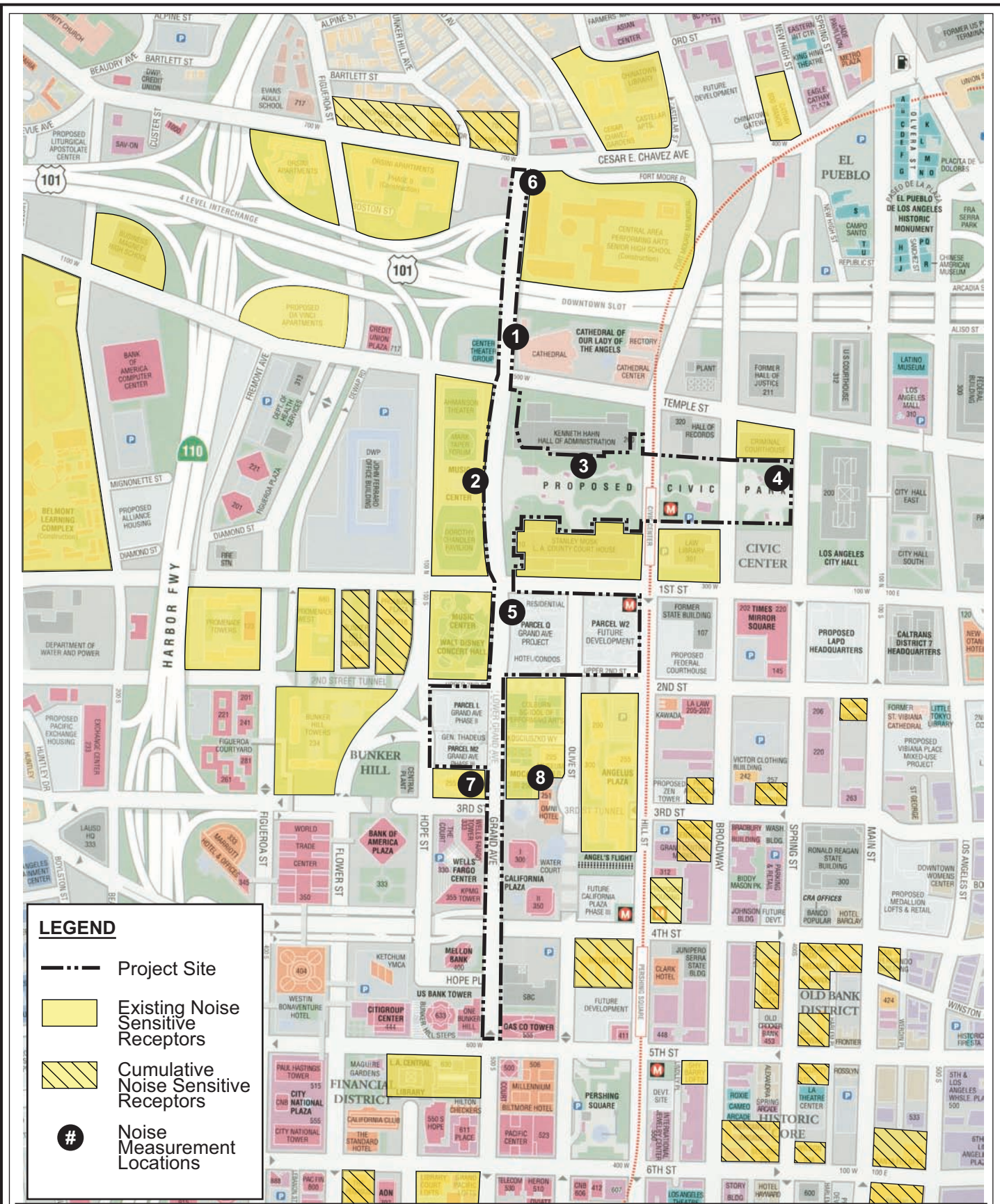
CEQA Thresholds Guide states that residences, schools, libraries, hospitals, day-care facilities, convalescent/retirement homes, and parks are generally more sensitive to noise than commercial and industrial land uses. Although courthouses are not specifically defined as noise sensitive land uses in the City's CEQA Thresholds Guide, the Los Angeles County Stanley Mosk Courthouse and the Clara Shortridge Foltz Criminal Justice Center were included as sensitive land uses given the close proximity of these uses to the proposed Civic Park, and the need for a more quiet environment in courtrooms during judicial proceedings. Noise-sensitive land uses (sensitive receptor locations) in the Project vicinity are shown in Figure 46 on page 578.

(2) Vibration-Sensitive Receptors

With the exception of residential uses adjacent to Parcels L and M-2, there are no residential uses that are located within the area of potential effect for perceptible vibration due to short-term construction and long-term Project operations. With respect to structures, all buildings are sensitive to vibration, although the extent of sensitivity is related to how the buildings were actually constructed. For example, Caltrans uses a ground-borne vibration damage threshold criterion of 2.0 inch-per-second PPV during construction for structures that are "well engineered". The FTA considers a ground-borne vibration damage threshold criterion of 0.2 inches-per-second PPV for structures that are "fragile"; and 0.12 inch-per-second PPV for structures that are "extremely fragile historic".¹³⁶ Section IV.D, Historical Resources, provides a detailed discussion of historic buildings within the project vicinity and illustrates the location of each of these buildings in Figure 41 on page 441. Buildings identified as having potential historic value within close proximity of the proposed Project site include the Los Angeles City Hall (1928) and the Hall of Justice Building (1925). The Los Angeles City Hall is located east of Spring Street and approximately 150 feet east of the proposed Civic Park. The Hall of Justice Building is located north of Temple Street and approximately 300 feet of the proposed Civic Park. Both properties have been previously assessed and identified as historical resources.

Additional land uses that would be considered sensitive to vibration include the Music Center Complex, Walt Disney Concert Hall, Los Angeles County Stanley Mosk Courthouse, Clara Shortridge Foltz Criminal Justice Center, the Museum of Contemporary Art, and the Colburn School of Performing Arts. Although the City's CEQA Thresholds Guide does not specifically identify types of land uses that would be considered vibration sensitive, these uses were conservatively classified as "fragile" structures given the close proximity of these uses to the proposed Project and that vibration may be considered disruptive to these uses (e.g., court proceedings).

¹³⁶ FTA, *Transit Noise and Vibration Impacts Assessments*, April 1995.



LEGEND





-  Project Site
-  Existing Noise Sensitive Receptors
-  Cumulative Noise Sensitive Receptors
-  Noise Measurement Locations

Figure 46
Noise Measurement and Sensitive Receptor Locations



Source: CARTIFACT, 2006

(3) Ambient Noise Levels

Ambient sound measurements were conducted in the vicinity of the Project site between Tuesday, December 18, through Sunday, December 25, 2005, to characterize the existing noise environment in the Project vicinity. The sound level meters were placed at the eight locations identified in Figure 46 on page 578. A summary of sound measurement data collected from the eight measurement locations is provided in Table 64 on page 580. As shown therein, the measured CNEL ranged from 63.5 dBA to 76.0 dBA. Based on the City of Los Angeles community noise/land use compatibility criteria provided earlier in Table 64 on page 580, this noise environment is generally considered “conditionally acceptable” for multi-family residential uses.

To further characterize the area’s noise environment, the CNEL generated by existing traffic on local roadways was established using roadway noise equations provided in the Caltrans Technical Noise Supplement (TeNS) document and traffic volume data provided by the Project’s traffic consultant. As indicated in Table 65 on page 581, the calculated CNEL for the analyzed roadway segments as a result of existing traffic volumes ranged from 63.5 dBA CNEL to 66.6 dBA CNEL at 50 feet from the roadway right-of-way based on surface-street traffic volumes only. These noise levels are generally consistent with the measured noise levels discussed earlier and provided in Table 64. Most land uses located near the Project site are currently exposed to community noise levels from traffic (at the right-of-way) that are “conditionally acceptable” as categorized by the City of Los Angeles Land Use Compatibility Matrix for Community Noise (refer to Table 63 on page 574).

3. ENVIRONMENTAL IMPACTS

a. Methodology

(1) On-Site Construction Noise

Construction noise impacts are evaluated by determining the noise levels generated by the different types of construction activity, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to ambient noise levels (i.e., noise levels without construction noise). More specifically, the following steps were undertaken to calculate construction-period noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 64 on page 580) and/or presumed noise level as stated in the LAMC, Section 111.03 (see Table 66 on page 582);

Table 64

Summary of Long-Term Ambient Noise Measurement Data (dBA) ^a

Measurement Location and Day	Daytime Hourly Ambient L _{eq} (Weekday/Weekend) ^b			Nighttime Hourly Ambient L _{eq} ^b			CNEL
	Avg.	Min.	Max.	Avg.	Min.	Max.	
1 - Cathedral of Our Lady of the Angels (12/22/05 - 12/25/05) – Weekday (2/10/06-2/12/06) – Weekend							
Weekday (12/23/05)	72.6	69.6	74.7	68.4	64.6	71.9	76.0
Weekend (2/10/06)	71.3	73.8	69.4	67.6	69.9	64.4	75.1
2 - Dorothy Chandler Pavilion (12/15/05 – 12/16/05)							
Weekday	69.7	66.3	70.8	63.4	58.3	66.4	72.0
3 - Civic Mall (12/13/05 – 12/15/05)							
Weekday	61.1	56.7	69.1	55.3	49.3	61.5	63.5
4 - Spring Street and Temple Street (12/13/05 – 12/15/05)							
Weekday	72.3	64.8	74.7	67.1	59.8	73.5	75.0
5 - Disney Concert Hall (12/15/05 – 12/17/05)							
Weekday	70.5	64.9	73.9	64.1	57.6	66.9	72.7
6 - Grand Avenue and Cesar E. Chavez Boulevard (12/13/05 – 12/15/05)							
Weekday	69.5	66.2	71.9	65.4	60.2	69.5	73.0
7 - Grand Promenade Tower Apartments (12/16/05 – 12/19/05)							
Weekday	64.0	58.8	67.5	57.6	55.0	61.2	66.1
Weekend	62.7	58.2	66.5	57.8	55.5	60.3	65.6
8 - Museum of Contemporary Art (MOCA) (12/13/05 – 12/15/05)							
Weekday	62.9	61.0	66.5	60.7	59.6	62.7	67.8

^a Based on a continuous ambient sound measurement using a Larson-Davis 820 Type 1 Integrating Sound Level Meter. Measurement locations are depicted in Figure 44 on page 569, and noise measurement data is provided in Appendix E.

^b Per LAMC regulations, daytime hours are from 7 A.M. to 10 P.M., and nighttime hours are from 10 P.M. to 7 A.M.

Source: PCR Services Corporation, 2006.

- Noise levels for each construction phase were obtained from the Los Angeles CEQA Thresholds Guide;
- Distances between construction site locations (noise source) and surrounding sensitive receptors were measured;

Table 65

Predicted Existing Vehicular Traffic Noise Levels

Roadway Segment	Adjacent Land Use	Noise Exposure Compatibility Category	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way		
			Adjacent	50 Feet	100 Feet
Grand Avenue, North of 101/110 Ramps	Residential/Commercial/Future LAUSD High School	Conditionally Acceptable	70.1	65.1	62.8
Grand Avenue, North of First Street	Commercial (Music/Concert Hall)	Normally Unacceptable	70.2	65.8	63.6
Grand Avenue, North of Temple Street	Religious Institution	Conditionally Acceptable	71.7	66.6	64.4
Grand Avenue, South of Second Street	Residential/Commercial	Conditionally Acceptable	68.3	64.3	62.2
Grand Avenue, South of Fifth Street	Commercial (Hotel)	Conditionally Acceptable	68.9	63.9	61.6
Hill Street, between Second Street and Third Street	Residential/Commercial	Conditionally Acceptable	71.3	66.6	64.4
Hope Street, South of GTK Way/Second Place	Residential/Commercial	Conditionally Acceptable	68.5	63.5	61.2
Olive Street, South of Second Street	Residential/Commercial	Conditionally Acceptable	69.5	65.5	63.5
Olive Street, South of Sixth Street	Residential/Commercial	Conditionally Acceptable	70.4	65.3	63.1
First Street, between Grand Avenue and Hope Street	Commercial (Music/Concert Hall)	Normally Unacceptable	70.0	66.4	64.5
First Street, West of Hope Street	Residential/Commercial	Conditionally Acceptable	70.1	66.6	64.6
Third Street, East of Flower Street	Residential/Commercial	Conditionally Acceptable	70.7	65.6	63.4
Sixth Street, between Olive Street and Hill Street	Residential/Commercial	Conditionally Acceptable	67.5	63.5	61.4

Source: PCR Services Corporation, 2006.

Table 66

Presumed Ambient Noise Levels (dBA)

Zone	Day	Night
Residential	50	40
Commercial	60	55
Manufacturing	65	65
Heavy Manufacturing	70	70

Source: LAMC, Section 111.03.

4. The construction noise level was then calculated for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
5. For each sensitive receptor location, the construction noise level obtained above from Step 4 was added to the ambient noise level described in Step 1 to calculate the construction noise impact in terms of an hourly L_{eq} ; and
6. Noise level increases were compared to the construction noise significance thresholds identified below.

(2) Off-Site Roadway Noise (During Construction and Project Operations)

Roadway noise impacts are evaluated using the Caltrans TeNS methodology with the roadway traffic volume data provided in the Project's Traffic Study (see Appendix B of this Draft EIR). This methodology allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway-noise attributable to Project development is calculated and compared to baseline noise levels that would occur under the "No Project" condition.

(3) Stationary Point-Source Noise (During Project Operations)

Stationary point-source noise impacts are evaluated by identifying the noise levels generated by outdoor stationary noise sources such as rooftop mechanical equipment and loading dock activities, calculating the hourly L_{eq} noise level from each noise source at surrounding sensitive receiver property line locations, and comparing such noise levels to ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 64 on page 580) and/or presumed noise level as stated in LAMC, Section 111.03 (see Table 66);
2. Mechanical equipment noise levels (hourly L_{eq}) were estimated based on LAMC Noise Ordinance requirements;
3. Distances between stationary noise sources and surrounding sensitive receptor locations were measured;
4. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
5. For each surrounding sensitive receptor location, stationary-source noise levels obtained from Step 4 were added to the ambient noise level described in Step 1 to ascertain stationary-source noise impacts in terms of a hourly L_{eq} ; and
6. Noise level increases were compared to the stationary source noise significance thresholds identified below.

(4) Ground-Borne Vibration (During Construction and Project Operations)

Ground-borne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination based on the PPV (construction-period) and RMS (operations-period) significance thresholds described below.

b. Significance Thresholds

The thresholds herein have been developed based on review of Appendix G of the CEQA Guidelines, local standards and regulations, and applicable significance criteria adopted by the City of Los Angeles.

(1) Construction

Section 112.05 of the City of Los Angeles Municipal Code sets a maximum noise level for powered equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is only required where “technically feasible.” This standard does differentiate between mobile and stationary pieces of equipment. In addition, and more conservatively, the City of Los Angeles CEQA Thresholds Guide provides that a

significant impact related to construction noise would result if project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise sensitive use, which in the case of the subject project is the property line of any residence. The more conservative of these two thresholds will be applied to the proposed project as set forth in the City of Los Angeles CEQA Thresholds Guide, which states that a significant impact related to construction noise would result if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6 P.M. on Saturday, or at anytime on Sunday.

(2) Construction Vibration

The City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction. Thus, the FTA and Caltrans standards described earlier are used to evaluate potential impacts related to Project construction. All structures that are located within the immediate vicinity of the Project site are considered “well engineered” (as opposed to “fragile” or “extremely fragile”); therefore, impacts relative to ground-borne vibration would be considered significant if the following future event were to occur:

- Project construction activities cause a PPV ground-borne vibration level to exceed 2.0 inches per second at any off-site structure.
- Project construction activities cause a PPV ground-borne vibration level to exceed 0.2 inches per second at any “fragile” structure.
- Project construction activities cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any “extremely fragile historic” structure.

(3) Noise from Project Operations

Based on the City's CEQA Thresholds Guide, a significant impact related to operational noise would result if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category (see Table 63 on page 574), or by 5 dBA in CNEL within the “normally acceptable” or “conditionally acceptable” category.
- Project-related operational (i.e., non-roadway) noise sources increase ambient noise by 5 dBA, thus causing a violation of the City Noise Ordinance.

(4) Ground-Borne Vibration from Project Operations

The City of Los Angeles does not have a specific significance threshold to assess vibration impacts due to long-term Project operations. Thus, the County of Los Angeles standard for human perception described earlier is used to evaluate potential impacts related to Project operations. Therefore, impacts relative to ground-borne vibration would be considered significant if the following future event were to occur:

- Project operational activities generate a ground-borne vibration level of 0.01 RMS or higher at any off-site structure.

c. Project Design Features that Address Potential Noise Impacts

The following Project design features have a potential to influence Project-related noise characteristics, and therefore, were taken into account during the analysis of potential Project impacts.

(1) Project Construction

- The Project contractor(s) would equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.
- All construction equipment would be stored on-site.
- Construction hours for exterior construction and hauling activities would occur between the hours of 7:00 A.M. and 9:00 P.M., Monday through Friday, and 8:00 A.M.

and 6 P.M. on Saturday. No construction would occur on Sundays and legal holidays.¹³⁷

(2) Project Operations

- All mechanical equipment would be enclosed and designed to meet the requirements of LAMC, Chapter XI, Section 112.02.
- All outdoor loading dock and trash/recycling areas would be fully or partially enclosed with a wall such that the line-of-sight between these noise sources and any adjacent noise sensitive land use would be obstructed.
- All rooftop mechanical equipment would be enclosed or screened from view with parapet screening.

d. Analysis of Project Impacts

(1) Proposed Project

(a) Construction Noise

(i) On-Site Construction Noise

Noise disturbances in those areas located adjacent to the Project site can be anticipated during construction. These disturbances would occur during site preparation activities and the subsequent construction of on-site structures. As with most construction projects, construction would require the use of a number of pieces of heavy equipment such as bulldozers, backhoes, cranes, loaders, and concrete mixers. In addition, both heavy- and light-duty trucks would be required to deliver construction materials to and export construction debris from the site. The maximum noise level generated by typical, individual pieces of construction equipment is provided in Table 67 on page 587. For example, as heavy-duty equipment passes near the Project site boundary, the maximum noise level (L_{max}) at a given moment along the property line would likely exceed 90 dBA for brief durations. In addition, pile driving activities could generate an L_{max} of 101 dBA at a distance of 50 feet. However, as equipment is used towards the more central portions of the Project site, the L_{max} noise level at the property line would diminish considerably into the 60's and 70's dBA.

¹³⁷ *The limitation on hours of construction is based on a combination of the more stringent requirements provided in the Los Angeles County Code and the City of Los Angeles Municipal Code.*

Table 67

Maximum Noise Levels Generated by Typical Construction Equipment

Type of Equipment	Sound Levels at Maximum Engine Power with Mufflers dBA at Indicated Distance			
	50 feet	100 feet	200 feet	400 feet
Pile Driver (Impact)	101	95	89	83
Pile Driver (Sonic)	96	90	84	76
Air Compressor	81	75	69	63
Backhoe	85	79	73	67
Backup Beep	85	79	73	67
Concrete Mixer	85	79	73	67
Crane, Mobile	83	77	71	65
Dozer	80	74	68	62
Grader	85	79	73	67
Jack Hammer	88	82	76	70
Loader	79	73	67	61
Paver	89	83	77	71
Pneumatic Tool	85	79	73	67
Pump	76	70	64	58
Roller	74	68	62	56
Saw	78	72	66	60
Scraper	88	82	76	70
Truck	91	85	79	73
Minimum Sound Level	74	68	62	56
Maximum Sound Level	101	95	89	83

Assumes a drop-off rate of 6 dB per doubling of distance, which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation over a hard surface propagation path.

Source: USEPA, Bolt, Beranek, and Newman, *Noise Control for Buildings and Manufacturing Plants*, 1987; and PCR Services Corporation, September 2005.

Composite construction noise (i.e., the noise from multiple pieces of construction equipment working concurrently) is best characterized in a study conducted by Bolt, Beranek, and Newman for the USEPA (USEPA December 31, 1971). In this study, construction noise during the heavier initial periods of construction is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity. This value takes into account both the number of pieces and spacing of the heavy equipment used in the construction effort.¹³⁸ In later phases during interior building construction, noise levels are typically reduced from this value, as the physical structures that are constructed break the line-of-sight noise

¹³⁸ Although pile driving generates an L_{max} of 101 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the maximum noise level over the entire duration).

transmission. The composite noise level for typical construction stages is provided in Table 68 on page 589. As shown in Table 68, the average construction-period noise level is forecasted to range from 77 dBA to 86 dBA at a reference distance of 50 feet from the center of construction activity.

Using the conservative industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment), the worst-case construction-period noise level of 86 dBA at a distance of 50 feet (cited previously) would be approximately 80 dBA at 100 feet, and 74 dBA at 200 feet. As such, for brief durations when construction activities occur along or near the Project site perimeter during overlapping construction activity (i.e., site demolition, initial stage of site preparation/excavation, and construction activities on Parcels Q, L and M-2, the worst-case noise level would be approximately 82 dBA Leq (1-hr) at the Colburn School of Performing Arts (distance of approximately 80 feet) located directly south of Parcel Q across Second Street. When added to the existing daytime ambient noise level of 63.0 dBA, this would result in an intermittent noise level increase of 19 dBA Leq (1-hour). While the overall construction duration is expected to be 9 years, these higher noise-producing activities are expected to occur for one to two months during demolition, between four and five months during excavation, and for brief durations during building construction. In addition, these noise levels at adjacent land uses would only occur when construction activities are along or near the Project site perimeter.

During the latter stages of construction activity, these maximum noise level increases would be reduced. For example, during the latter stages of the site preparation/excavation phase, construction activity would occur below street level within an excavated cavity, and as such, the earthen wall would serve as a sound barrier to break the line of sight between construction activity and the closest sensitive receptor property line. This would reduce the maximum noise level increase, at the Grand Promenade Tower Apartments property line, to about 11 dBA Leq (1-hour) above the existing daytime ambient noise level. During the finishing phase of Project construction, the vast majority of construction activities would occur from within the interior of buildings on the Project site, and as a result, the maximum noise level increase at the Grand Promenade Tower Apartments property line would be reduced substantially due to noise reductions attributable to the Project's building shells.

In the case of the Grand Avenue streetscape improvements, construction activities are expected to be spread out along the entire street segment (i.e., Cesar E. Chavez Avenue to Fifth Street) and not be concentrated in any one location for an extended period of time. However, construction noise levels could be as loud as 80 dBA for noise sensitive land uses adjacent to Grand Avenue (e.g., proposed LAUSD High School for the Performing Arts). As the improvements are along a corridor, the elevated noise levels would only be experienced for short-term durations as the improvements move along the corridor. Nevertheless, noise levels would substantially exceed ambient noise levels. As an example, the average daytime ambient

Table 68

Construction Average L_{eq} Noise Levels by Distance and Construction Stage

Construction Stage	Sound Level in dBA (L_{eq}) at Indicated Distance				
	25 Feet	50 Feet	100 Feet	150 Feet	200 Feet
Ground Clearing	88	82	76	72	70
Grading/Excavation	92	86	80	76	74
Foundations	83	77	71	67	65
Structural	89	83	77	73	71
Finishing	92	86	80	76	74

Assumes a hard surface propagation path drop-off rate of 6-dB per doubling of distance, which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation.

Source: EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; and PCR Services Corporation, 2005.

noise level near the proposed LAUSD High School for the Performing Arts site is approximately 70 dBA L_{eq} , and thus, construction noise levels could increase ambient noise levels by 10 dBA.

A summary of maximum noise level increases by receptor location and phase of construction activity, at their property lines, is provided in Table 69 on page 590. As shown therein, noise from construction would cause the ambient noise level to exceed the 5-dBA significance threshold at multiple receptors when construction activities are occurring in close proximity to the land uses. Also, the threshold would be exceeded at sensitive land uses along Grand Avenue due to streetscape improvements that would occur for short-term durations. Nevertheless, construction-period noise impacts would be significant without incorporation of mitigation measures.

(ii) Off-Site Construction Noise

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the Project site throughout the Project's construction period. While construction workers would arrive from many parts of the region, and thus different directions, haul trucks and delivery trucks would generally travel to the Project site by way of Third Street and the Harbor Freeway (I-110). This proposed route would avoid as many noise-sensitive uses as feasible that are present within the Project vicinity. In addition, construction traffic would not occur during the noise-sensitive late evening and nighttime hours.

Table 69

Conservative Estimate of Noise Impacts During Construction^a

Receptor Location	Construction-Period Noise Level (L_{eq}) by Construction Area ^b										
	Daytime	Parcel Q (Phase 1)		Parcels L and M-2 (Phase 2)		Parcel W-1/W-2 (Phase 3)		Parcel Q, L and M-2 (Overlap)		Civic Mall	
		Ambient Sound Level (L_{eq}) ^b	dBA (L_{eq})	Increase Over Ambien t	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})	Increase Over Ambient	dBA (L_{eq})
Colburn School of Performing Arts	63	80	17	77	14	77	14	82	19	58	<1
Grand Promenade Tower Apartments	64	65	1	80	16	53	<1	80	16	57	<1
Music Center	70	74	4	53	<1	54	<1	74	4	77	7
Museum Tower Apartments	63	69	6	60	<1	69	6	69	7	58	<1
Angelus Plaza Senior Housing	63	56	<1	53	<1	57	<1	58	<1	58	<1
Los Angeles County/Stanley Mosk Courthouse	61	80	19	53	<1	80	19	80	19	80	19
Law Library	61	63	2	49	<1	67	6	63	2	78	17
Clara Shortridge Foltz Criminal Justice Center	72	51	<1	45	<1	48	<1	52	<1	80	8

^a Based on an average construction noise level of 86 dBA L_{eq} at a distance of 50 feet. The distance from construction activity by construction area for each receptor location is provided in the Noise Appendix.

^b The noise level values presented herein are rounded to whole number increments. As a result of rounding, the "Increase over Ambient" noise level increment may be slightly increased in some instances.

Source: PCR Services Corporation, 2006; Calculation worksheets provided in Appendix E.

(b) Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spreads through the ground and diminishes in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures. The FTA has published standard vibration velocities for construction equipment operations. The peak particle velocities for construction equipment pieces anticipated to be used during Project construction are listed in Table 70 on page 592.

Ground-borne vibration decreases rapidly with distance. As indicated in Table 70, based on the FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.644 inch/sec PPV at 25 feet from the source of activity. At 100 feet from the source of activity, vibration velocities range from 0.001 to 0.081 inch/sec PPV. With regard to the proposed Project, ground-borne vibration would be generated primarily during site clearing and grading activities on site and by off-site haul-truck travel. However, Project construction would also require pile driving during the foundation phase. The PPV from bulldozer and heavy truck operations is shown to be 0.089 PPV and 0.076 PPV, respectively, at a distance of 25 feet. With respect to impact pile driving, no structures are present within 25 feet of potential pile driving activity, and the PPV from impact pile driving at 25 feet would be approximately 0.644 inch/sec. As each of these values is below the 2.0 inch/sec PPV significance threshold, vibration impacts associated with construction to off-site structures would be less than significant and no mitigation measures are required.

With regard to “fragile” structures and “extremely fragile historic” structures, maximum construction vibration levels (i.e., pile driving activities) would be below the “fragile” structure significance threshold of 0.2 inches per second at a distance of 55 feet and the “extremely fragile historic” structure significance threshold of 0.12 inches per second at a distance of 80 feet, respectively. No “fragile” or “extremely fragile historic” structures are located within these distances and, therefore, vibration impacts associated with construction would be less than significant and no mitigation measures are required.

Table 70

**Typical Vibration Velocities
for Potential Project Construction Equipment**

Equipment	Approximate Peak Particle Velocity (inches per second)				
	25 feet	50 feet	75 feet	100 feet	200 feet
Impact pile driver	0.644	0.228	0.124	0.081	0.028
Sonic pile driver	0.170	0.060	0.033	0.021	0.008
Large bulldozer	0.089	0.031	0.017	0.011	0.004
Caisson drilling	0.089	0.031	0.017	0.011	0.004
Loaded trucks	0.076	0.027	0.015	0.010	0.003
Jackhammer	0.035	0.012	0.007	0.004	0.002
Small bulldozer	0.003	0.001	0.001	0.001	0.001

Source: USDOT Federal Transit Administration, 1995.

(c) Operation Noise (Post-Construction)

This section provides a discussion of potential noise impacts related to the long-term operations of the proposed Project, following completion of construction, to neighboring noise-sensitive receptor locations. However, the noise environment that currently exists surrounding the Project site would also impact the proposed development. As indicated by the noise measurement data presented in Table 64 on page 580, the Project site is currently exposed to noise levels that range from 66.1 dBA to 67.8 dBA CNEL where residential uses are proposed, due primarily to roadway traffic volumes along Grand Avenue. At times, the baseline ambient noise level currently exceeds the City-recommended noise standard (65 dBA CNEL) for the siting of multi-family residential dwelling units. With respect to land use compatibility and the existing community noise environment, the siting of residential uses on the Project site could result in a significant impact without the incorporation of mitigation measures.

With respect to Project impacts to neighboring noise-sensitive receptor locations, Project-specific noise sources considered herein include roadway noise; mechanical equipment/point sources (i.e., loading dock and trash pick-up areas); parking facilities; rooftop helipad-related noise; and park activities).

(i) Off-Site Roadway Noise

According to the Proposed Project traffic study, included as Appendix B to this Draft EIR, the proposed Project is expected to generate a maximum of 23,194 additional daily trips. Traffic attributed to the proposed Project would represent an increase in traffic over the total daily traffic traveling along the major thoroughfares within the proposed Project vicinity. This

increase in roadway traffic volumes was analyzed to determine if any traffic-related noise impacts would result from proposed Project development. Table 71 on page 594 provides the calculated CNEL for the analyzed roadway segments for the following scenarios: (1) existing conditions; (2) future without development of the proposed Project; (3) future with development of the proposed Project; (4) the increase attributed to proposed Project-generated traffic volumes; and (5) the cumulative increase (i.e., increase attributable to ambient growth, related projects, and proposed Project traffic volumes) above existing noise levels.

The largest proposed Project-related and cumulative traffic-related noise impact is anticipated to occur along the future segment of Second Street, between Grand Avenue and Olive Street. Proposed Project-related traffic would add 1.3 dBA CNEL to this roadway segment along Second Street, while related project plus ambient growth traffic volumes are forecasted to add an additional 1.2 dBA CNEL to this roadway segment, for a combined total of 2.5 dBA CNEL. As the incremental increases in noise levels at all other analyzed locations are less than 1.6 dBA CNEL, and these noise level increases are less than the 3-dBA CNEL significance threshold for conditionally acceptable noise environments and the 5-dBA CNEL significance thresholds for acceptable noise environments, proposed Project roadway noise impacts are considered less than significant, and no mitigation measures are required.

(ii) Stationary Point-Source Noise

This section considers potential noise impacts to neighboring noise-sensitive properties related to specific noise sources associated with the operation of the proposed Project. Such potential noise sources include:

- Mechanical equipment rooms (e.g., boiler, chiller, and emergency generator);
- Loading dock and trash/recycling areas;
- Miscellaneous rooftop equipment;
- Outdoor gathering areas (e.g., outdoor dining, podiums, and deck areas);
- Parking and circulation areas;
- Rooftop helipads; and
- Civic Park Uses.

A discussion of each of these noise sources is provided below, followed by a discussion of the potential composite noise level increase (due to multiple noise sources) at the analyzed sensitive receptor locations.

Table 71

Roadway Noise Impacts at 50 Feet from Right-Of-Way ^a

Roadway Segment	Existing dBA CNEL	Future No-Project dBA CNEL	Future with Project dBA CNEL	Project Increment ^b	Cumulative Increment ^c
Grand Avenue, North of 101/110 Ramps	65.1	66.5	66.6	0.1	1.5
Grand Avenue, North of First Street	65.8	66.8	67.3	0.5	1.5
Grand Avenue, North of Temple Street	66.6	67.8	68.2	0.4	1.6
Grand Avenue, South of Second Street	64.3	65.3	65.4	0.1	1.1
Grand Avenue, South of Fifth Street	63.9	65.0	65.3	0.3	1.4
Hill Street, between Second Street and Third Street	66.6	68.0	68.6	0.6	2.0
Hope Street, South of GTK Way/Second Place	63.5	64.1	64.4	0.3	0.9
Olive Street, South of Second Street	65.5	66.3	67.1	0.8	1.6
Olive Street, South of Sixth Street	65.3	65.9	66.2	0.3	0.9
First Street, between Grand Avenue and Hope Street	66.4	67.6	67.9	0.3	1.5
First Street, West of Hope Street	66.6	67.7	68.0	0.3	1.4
Second Street, between Grand Avenue and Olive Street ^d	62.3	63.5	64.8	1.3	2.5 ^e
Third Street, East of Flower Street	65.6	67.1	67.2	0.1	1.6
Sixth Street, between Olive Street and Hill Street	63.5	65.0	65.1	0.1	1.6

^a Exterior CNEL noise levels related to transportation-source noise only and do not account for noise attenuation from intervening structures.

^b Increase relative to traffic noise levels comparing future pre-Proposed Project conditions to future with development of the Proposed Project.

^c Increase relative to traffic noise levels comparing existing conditions to future with development of the Proposed Project, which includes ambient growth and related project traffic volumes.

^d This roadway currently does not exist. Construction of this street extension is anticipated to begin in late 2006. Therefore, ambient noise measurements were conducted to establish a baseline noise level. PCR conducted noise measurements on March 24th, 2006 over a two hour duration from 10 A.M. to 12 P.M. Future no project and future with project noise levels were calculated based on the combined measured ambient noise level and traffic noise levels.

^e As this roadway currently does not exist, the cumulative increment is based on a comparison of existing measured ambient noise levels to modeled future with Project noise levels.

Source: PCR Services Corporation, 2006.

1) Mechanical Equipment Rooms

The proposed Project would require mechanical equipment such as HVAC systems, elevators and emergency generators to support the proposed structures. Such mechanical equipment is capable of generating high noise levels. However, Project design features, as

detailed in Section IV.E.2.c, above, would ensure that all equipment noise levels comply with City of Los Angeles Noise Ordinance requirements, for both daytime (65 dBA) and nighttime (60 dBA) operation at the Project's property line. In addition, implementation of Project design features would ensure that any noise level increase remains below the 5-dBA significance threshold at all sensitive receptor locations. As such, impacts would be less than significant, and no mitigation measures are required.

2) Loading Dock and Refuse Collection/Recycling Areas

The proposed Project would have loading dock and refuse collection/recycling areas to support building uses, which are capable of generating a noise level as high as 75 dBA (50-foot reference distance). Project design features, detailed above in Section IV.E.2.c, would ensure that all outdoor loading dock and trash/recycling areas would be fully or partially enclosed with a wall such that the line-of-sight between these noise sources and any adjacent noise sensitive land use would be obstructed. By blocking the sound transmission path between the loading dock-area noise sources and nearby residential uses, this wall would provide approximately 5 dBA of sound attenuation. Based on a reference noise level estimate of 75 dBA L_{eq} (1-hour) at 50 feet, and taking into account the 5 dBA of sound-wall attenuation, noise generated in the loading dock area could potentially increase the ambient noise level in adjacent areas to the south of Parcel Q, L and M-2 by as much as 2.1 dBA L_{eq} (1-hour); but potential increases in the CNEL would be negligible since the loading dock/refuse collection area would be primarily used during daytime evenings and less often during the noise-sensitive nighttime time period. Noise level increases would not exceed the 5-dBA L_{eq} (1-hour) or the 3-dBA CNEL significance threshold for conditionally acceptable noise environments at any off-site receptor location. As such, impacts would be less than significant, and no mitigation measures are required.

3) Miscellaneous Rooftop Equipment

Individual air handling units and exhaust fans would be located on building rooftops in order to provide for ventilation and air circulation. Parapet screens would shield/enclose all such rooftop equipment. Project design features, detailed above in Section IV.E.2.c, would ensure that all rooftop equipment noise levels comply with City of Los Angeles Noise Ordinance requirements, for both daytime (65 dBA) and nighttime (60 dBA) operation at the nearest adjacent property line. In addition, implementation of Project design features would ensure that any noise level increase remains below the 5-dBA significance threshold at all sensitive receptor locations. As such, impacts would be less than significant, and no mitigation measures are required.

4) Outdoor Gathering Areas (Outdoor Dining, Podiums, and Deck Areas, etc.)

The proposed Project would have a number of outdoor gathering areas, which may include outdoor dining, decks, and plaza/garden areas throughout the site. Based on a reference noise level estimate of 65 dBA L_{eq} at 50 feet, noise generated in these areas could potentially increase the ambient noise level in areas that surround the proposed Project site by as much as 1.2 dBA L_{eq} (1-hour); and potential increases in the CNEL would be negligible.¹³⁹ As noise level increases are not forecasted to exceed neither the 5-dBA L_{eq} (1-hour) nor the 3-dBA significance threshold for conditionally acceptable noise environments, potential impacts would be less than significant.

5) Parking Facility Noise Levels

Various noise events would also occur within the proposed underground parking structures. Typical maximum noise levels from parking structure activities are shown in Table 72 on page 597. The activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals would occur periodically. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events, which generate maximum noise levels as high as 69 dBA at a reference distance of 50 feet, would occur less frequently. However, due to the fact that the proposed parking facility would be subterranean with no unobstructed openings that face toward any noise-sensitive receptor location, there is no potential for parking facility-related noise to exceed the 5-dBA L_{eq} (1-hour) significance threshold at any off site receiver location. Furthermore, noise attributable to vehicle operations occurring on the on-site surface roadways which provide access to the structures would not exceed the established significance thresholds at any noise-sensitive receptor location, due to the limited number of vehicles in this area on an hourly basis and that the on-site structures would shield this noise source from traveling off the Project site. As such, impacts would be less than significant, and no mitigation measures are required.

6) Rooftop Helipad Noise Levels

The proposed Project would include one or more buildings that would require an emergency helipad pursuant to City of Los Angeles Municipal Code (LAMC) requirements.¹⁴⁰

¹³⁹ *Ibid.*

¹⁴⁰ *City of Los Angeles Municipal Code Section 57.118.12 requires that buildings over 75 feet in height be equipped with an emergency helipad.*

Table 72

**Typical Maximum Noise Level From Individual
Parking Structure-Related Noise Events**

Source	Reference Sound Level^a	Reference Distance	Maximum Sound Level at 50 Feet^b	Frequency of Occurrence	1-Hour L_{eq} Noise Level at 50 Feet
Automobile at 14 mph	65 dBA	25 feet	59 dBA	50 percent	56 dBA
Car Alarm	75 dBA	25 feet	69 dBA	1 percent	49 dBA
Car Horn	75 dBA	25 feet	69 dBA	0.5 percent	46 dBA
Door Slam	70 dBA	25 feet	64 dBA	5 percent	51 dBA
Tire Squeal	80 dBA	10 feet	70 dBA	10 percent	56 dBA
Composite L_{eq} (1-hour)					60 dBA

^a Reference noise levels are based on actual measurement data.

^b Since parking structure-related noise is more akin to a point-source, rather than a line-source, the 6-dBA per doubling of distance attenuation factor was used to distance-adjust all reference noise levels.

Source: PCR Services Corporation, 2006.

As such, these helipads would be used for emergency purposes only. Due to infrequent and the emergency nature of such a use, adverse noise impacts related to helipad uses would be less than significant.

7) Civic Park Uses

The proposed Civic Park would serve as a central gathering place for the City, with one of its underlying design purposes being to facilitate a program of ongoing and special civic events and activities. Under the Conceptual Plan, the proposed Civic Park would be designed with the intent that specified areas would accommodate particular programmed uses, but would also work in unison for larger events. Under the Conceptual Plan, the westernmost, approximately 8-acre section is proposed to be utilized for cultural and entertainment uses. The middle, approximately 4-acre section is proposed to be used as a garden space for smaller scale uses and the easternmost, approximately 4-acre section is proposed to be used for civic and community activities.

Typical park uses would not be considered a substantial noise source as no organized athletic activities are proposed and typical activities would consist of picnics, exercise, and enjoyment of the outdoors. However, the Conceptual Plan for the Civic Park includes a Great Lawn and a Grand Terrace in the westernmost section, in which the focus would be on cultural and entertainment uses. As the "Cultural and Entertainment" section, this area would include public activity kiosks, movable seating and tables, and food and drink concessions. The intent of

this section of the Civic Park is to provide a setting for festivals and civic event programming, along with small pavilions that could host food and drink concessions.

Outdoor shows and events have the potential to generate significant noise levels during staged special events and operations within the other venues that may be located within Civic Park. These events would potentially include amplified speech and music. Noise measurements conducted by PCR during the Los Angeles Lakers' 1999-2000 NBA Championship victory parade and celebration indicate that noise levels typically range from 75 to 87 dBA at a distance of 50 feet during a parade and a staged outdoor celebration. This type of activity is representative of a heavily attended outdoor event that could be staged within the Civic Park.

The noise generated by an outdoor event would be partially attenuated by the shielding provided by proposed structures on the Project site and existing structures surrounding the Project site. The future L_{eq} for outdoor events would be approximately 63 to 75 dBA at the uses surrounding the Civic Park. As these surrounding uses include the Los Angeles County Courthouse, Clara Shortridge Foltz Criminal Justice Center, and law library, outdoor event noise levels could intermittently interfere with these uses. The noise level at the closest apartments (Grand Promenade Tower Apartments) would be approximately 50 dBA. As this future noise level would be less than existing ambient traffic noise levels, the Project with County Office Building Option would result in impacts that would be less than significant. However, because of the characteristics of amplified speech and crowd cheering, the noise generated during these events may be occasionally discernible at the nearby sensitive receptors.

Large scale events that may occur with the Civic Park would be expected to include police security, helicopter coverage, and crowd control measures. Noise produced by police sirens, helicopter flyovers, car horns, and bullhorns would not be expected to cause significant noise impacts as these activities would be intermittent, but because of their intrusive nature, the noise may be a potential source of annoyance to residences. These temporary noise sources would result in a less than significant impact as they would be conducted in compliance with the City Noise Ordinance.

8) Composite Noise Level Impacts from Proposed Project Operations

With respect to land use compatibility, as represented by the CNEL descriptor, an evaluation of community noise from all proposed Project sources (i.e., composite noise level) was conducted to conservatively ascertain proposed Project contributions to the CNEL at the noise-sensitive locations within the proposed Project vicinity. For purposes of calculating the composite noise level, all noise events were based on the temporal nature of each activity over a 24 hour period, which is more frequent than such activities would be expected to occur. The traffic contribution to the CNEL was calculated based on Project-related traffic using FHWA-

RD-77-108 roadway noise prediction methodology combined with a Caltrans' L_{eq} to CNEL conversion procedure.

Based on a review of the noise-sensitive land uses and the Project's noise sources, the only noise-sensitive locations wherein composite noise impacts could occur are at the Grand Promenade Tower Apartments, Los Angeles County Courthouse, Clara Shortridge Foltz Criminal Justice Center, Law Library, and the Colburn School of Performing Arts. Due to a combination of distance and the presence of intervening structures that would serve as noise barriers, the only Project noise source that could potentially affect the other noise-sensitive locations included in this analysis is roadway noise, the potential impacts of which are fully analyzed above. Primary Project noise sources that could potentially affect the Grand Promenade Tower Apartments, Los Angeles County Courthouse, Clara Shortridge Foltz Criminal Justice Center, Law Library, and the Colburn School of Performing Arts include roadway traffic volumes, parking structure-related noise events, outdoor gathering areas, and loading dock/refuse collection area noise events. Based on the spatial relationship of these different noise sources, a conservative noise level of 65 dBA L_{eq} at 50 feet was used to represent these sources. Thus, at the Grand Promenade Tower Apartments, the composite noise level from off-site traffic and on-site uses could result in an increase of 1.8 dBA CNEL; Los Angeles County Courthouse, Clara Shortridge Foltz Criminal Justice Center, and Law Library could increase by 1.3 dBA; and the Colburn School of Performing Arts could increase by 1.6 dBA CNEL. As such, the composite noise level increase would not exceed the 3-dBA CNEL significance threshold for conditionally acceptable noise environments at any sensitive receiver location. Potential impacts would be less than significant and no mitigation measures would be required.

(d) Operations-Period Vibration

The proposed Project does not include stationary equipment that would result in high vibration levels. The main vibration sources would be passenger vehicle circulation within the proposed subterranean parking facility, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. Vibration levels were analyzed to assess potential impacts at the nearest adjacent structures that are situated at least 35 feet away from the proposed parking facility location. Ground-borne vibration generated by each of the above-mentioned activities were estimated using vibration measurement data collected at existing parking facilities, refuse/delivery truck ingress/egress paths, and loading dock/refuse collection areas that are similar to those proposed as part of the Project.

Vibration levels at 12 parking structures were measured by PCR to quantify typical vibration velocities generated by vehicles within the structures and on the surrounding roadways.¹⁴¹ The maximum measured vibration at these representative locations was 0.002 inch per second RMS at a reference distance of approximately 35 feet. The maximum measured vibration due to refuse/delivery truck circulation was 0.008 inch per second RMS at a reference distance of approximately 15 feet. And finally, the maximum measured vibration due to loading dock/refuse collection area activities was less than 0.002 inch per second RMS at a reference distance of approximately 35 feet. These levels indicate that potential vibration impacts from all proposed project sources at the closest structure locations would be less than the perceptibility significance threshold of 0.01 inch per second RMS. As such, vibration created by proposed Project operations would be below the significance threshold. Impacts would be less than significant and no mitigation measures would be required.

(e) Concurrent Construction and Operations

The potential exists that the later stages of Project construction could occur concurrently with the occupancy of the earlier stages of development. As discussed previously, construction noise would be associated with use of heavy equipment on-site and trucks for delivery of construction materials to as well as the export of construction debris from the site. Operational sources include mechanical equipment/point sources (i.e., loading dock and trash pick-up areas), parking facilities, rooftop helipad-related noise, and park activities. Construction activities generate substantially louder noise levels than activities associated with operations. As such, concurrent noise levels would be similar to the construction noise levels presented above in Table 69 on page 590. Therefore, concurrent construction and operation of the proposed Project would result in a short-term significant impact due to construction noise.

(2) Additional Residential Development Option

(a) Construction

The Additional Residential Development Option would increase the amount of housing units while decreasing the amount of office space within Parcels W-1/W-2. The construction program would be substantially similar to that of the proposed Project, and like the proposed Project would generate temporary noise from construction comparable to that forecasted to occur under the proposed Project. As such, the development of the Additional Residential Development Option would cause the ambient noise level to exceed the 5-dBA significance threshold at multiple receptors when construction activities are occurring in close proximity to

¹⁴¹ PCR Services Corporation, *Disneyland Resort Proposed West Parking Structure Vibration Analysis, 1997*.

the land uses. As such, and as is the case with the proposed Project, construction noise impacts would be significant. Similar to the proposed Project, vibration impacts associated with construction activities would be less than significant.

(b) Operation

The Additional Residential Development Option would, like the proposed Project, include a mix of residential uses and employee generating uses. However, the number of residential units would be increased, and the proposed office floor area would be removed from the Project. The resulting development would include 2,660 residential units. This is an increase of up to 600 residential units in total and a reduction of up to 681,000 square feet of office floor area. With regard to mobile source noise levels, the number of vehicle trips generated by the Additional Residential Development Option was conservatively assumed not to change as a result of the change in land use. Thus, traffic related noise impacts as presented in Table 71 on page 594 would remain unchanged and are thus concluded to be less than significant. In addition, high-rise buildings require many of the same types of stationary sources (e.g., mechanical equipment, loading docks, trash collection, etc.) regardless of land use (residential units versus office floor area). As a result, noise levels would be substantially the same. Therefore, operational noise impacts under the Additional Residential Development Option, as is the case with the Project with County Office Building Option, would be less than significant.

4 CUMULATIVE IMPACTS

All of the identified related projects have been considered for the purposes of assessing cumulative noise impacts. The potential for noise impacts to occur are specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network. Due to the rapid attenuation characteristics of ground-borne vibration, there is no potential for a cumulative construction- or operational-period impact with respect to ground-borne vibration.

a. Construction-Period Noise

Of the 93 related projects that have been identified within the proposed Project study area, Related Companies has no control over the timing or sequencing of the related projects, and as such, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise for the proposed Project and each related project (that has not yet been built) would be localized. In addition, it is likely that each of the related projects would have to comply with the local noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require significant impacts to be reduced to the extent feasible.

As shown in Figure 11 on page 149, there are a few related projects that are located within the Project vicinity. If these projects are under construction during proposed Project construction, significant cumulative impacts could occur due to concurrent construction activities at multiple locations. Thus, noise impacts due to construction of the proposed Project in combination with those related projects in proximity to the Project site would also be significant.

b. Operational-Period Noise

The Project site and surrounding area have been developed with uses that have previously generated, and would continue to generate, noise from a number of community noise sources including vehicle travel, mechanical equipment (e.g., HVAC systems), and lawn maintenance activities. Each of the 91 related projects that have been identified within the general Project vicinity would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. All related projects are of a residential, retail, commercial, or institutional nature, and these uses are not typically associated with excessive exterior noise; however, each project would produce traffic volumes that are capable of generating a roadway noise impact. As discussed previously, traffic volumes from the proposed Project and the 91 related projects, combined with ambient growth traffic, were evaluated and presented in Table 71 on page 594. Cumulative traffic volumes would result in a maximum increase of 2.5 dBA CNEL along the future segment of Second Street, between Grand Avenue and Olive Street. As this noise level increase would be below the more conservative 3-dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant.

Due to Los Angeles Municipal Code provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. For this reason on-site noise produced by any related project would not be additive to Project-related noise levels. As the Project's composite noise impacts would be less than significant, composite stationary-source noise impacts attributable to cumulative development would also be less than significant.

5. MITIGATION MEASURES

Mitigation Measures are proposed below to reduce the Project's potentially significant noise impacts.

a. Construction**Mitigation Measures**

Mitigation Measure G-1: To reduce any impact on nearby venues that may be noise sensitive receptors, such as the Music Center, Disney Hall, and the County Courthouse, the following Measures G-1 and G-2 shall be implemented as follows: During each construction phase, Related, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall limit (i) construction activities utilizing heavy equipment to Monday through Friday from 7:00 A.M. to 8:00 P.M., and (ii) interior construction work inside building shells and construction activities not utilizing heavy equipment to 7:00 A.M. to 9 P.M Monday through Friday. Saturday construction shall be limited to 8:00 A.M. to 6 P.M. No construction activities shall be permitted on Sundays or holidays. Construction noise measures shall also be implemented, which may include the use of noise mufflers on construction equipment used within 100 feet of these venues. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-2: During each construction phase, Related, with regard to the five development parcels and the responsible parties for implementation of the Streetscape Program shall not use heavy equipment within (to the maximum extent practicable) 100 feet of the County Courthouse while Court is in session. Construction noise reduction measures shall also be implemented, which may include the use of noise mufflers on construction equipment. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

Mitigation Measure G-3: During the initial stage of each construction phase (site demolition and site preparation/excavation) for each Project parcel and when construction activities are within 200 feet of noise sensitive land uses, Related, with regard to the five development parcels, shall erect a temporary, 8-foot, ½-inch-thick plywood fence along the boundaries or each construction site adjacent to noise sensitive uses such that the "line of sight" between on-site construction activities and the residential or other sensitive uses is blocked, where feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels.

Mitigation Measure G-4: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that pile drivers within the individual activity/development site under construction at that time shall be equipped with noise control devices having a minimum quieting factor of 10 dBA. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-5: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall, except as otherwise permitted by applicable agreements, ensure that construction loading and staging areas shall be located on-site within each respective construction site and away from noise-sensitive uses to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-6: Prior to the issuance of grading permits for each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications that include a requirement to route pedestrians (to the maximum extent practicable) 50 feet away from the construction area when heavy equipment such as hydraulic excavators are in use. Such routing may include the posting of signs at adjacent intersections. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-7: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall designate a construction relations officer to serve as a liaison with surrounding property owners who is responsible for responding to any concerns regarding construction noise. The liaison shall coordinate with the Project construction manager(s) to implement remedial measures in the shortest time feasible. The

liaison's telephone number(s) shall be prominently displayed at multiple locations along the perimeter of each construction site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

b. Operations

To further reduce noise impacts on the Project, the following mitigation measure is recommended:

Mitigation Measures

Mitigation Measure G-8: Related, with regard to the five development parcels, shall prepare and implement building plans that ensure prior to the start of each construction phase which includes residential development that all exterior walls, floor-ceiling assemblies (unless within a unit), and windows having a line of sight (30 degrees measured from the horizontal plane) of Grand Avenue, Hill Street, Hope Street, First Street, and Second Street of such residential development shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 30, subject to field testing, as defined in the UBC Standard No. 35-1, 1982 edition. Sign-off by the City's Department of Building and Safety, or other appropriate City agency or department, shall be required prior to obtaining a building permit. Related, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City's Department of Building and Safety, or other appropriate City agency or department. Examples of alternative means may include, but are not limited to, the following: (1) acoustical seals for doors and windows opening to the exterior; (2) consideration of the type, location, and size of windows; and (3) sealing or baffling of openings and vents. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

The noise reduction measures prescribed in Mitigation Measure G-1 would achieve a minimum 5-dBA reduction along areas of sensitive receptors where the line-of-sight to ground-level construction activity that occurs on the Project site is broken. Regulatory Measure G-1 would preclude construction-period noise impacts from occurring during the noise-sensitive night time periods, or at any time on Sundays. Noise level reductions attributable to Mitigation Measures G-2 and G-3 and Project design features (e.g., use of noise mufflers and on-site storage of construction equipment) are not easily quantifiable, but implementation of such measures would reduce the noise level impact associated with construction activities to the extent practicable. Nevertheless, Project construction activities would intermittently increase the daytime noise levels at nearby sensitive land uses during construction activities by more than the 5-dBA significance threshold. As such, noise impacts during construction are concluded to be significant and unavoidable.

b. Operations

Project development would not result in any significant noise impacts to off-site receptors during long-term Project operations. With implementation of Mitigation Measure G-8, on-site residents would not be exposed to inappropriately high noise levels from off-site activity (i.e., vehicle traffic on adjacent roadways).

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. HAZARDS AND HAZARDOUS MATERIALS

1. INTRODUCTION

Hazardous materials are generally substances which, by their nature and reactivity, have the capacity to cause harm or a health hazard during normal exposure or an accidental release, and are characterized as being toxic, corrosive, flammable, reactive, an irritant or strong sensitizer. Activities and operations that use or manage hazardous or potentially hazardous substances, or that are located in areas where such substances exist, could create a hazardous situation if the release of these substances occurred. Individual circumstances, including the type of substance, quantity used or managed, and the nature of the activities and operations, affect the probable frequency and severity of the risks, if any, to human health or the environment due to the presence of hazardous materials. Federal, state, and local laws regulate the use and management of hazardous or potentially hazardous substances.

This section addresses hazards and hazardous materials, with a focus on existing and historical on- and off-site conditions, as well as the potential impacts associated with proposed uses on the site. The analysis in this section is based on the April 2005 Phase I Environmental Site Assessment (ESA) for Parcels L, M-2, Q, and W-2, and the November 2005 Phase I ESA for Parcel W-1, both of which were prepared by Iris Environmental in accordance with American Society of Testing and Materials (ASTM) standards. The ESAs are provided in Appendix F of this EIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

Federal Level

The Federal Resource Conservation and Recovery Act (RCRA) was enacted in 1976 and mandated a national waste management program. Under the RCRA regulations, as established by the United States Environmental Protection Agency (EPA), hazardous wastes must be tracked from the time of generation to the point of disposal. The RCRA program also sets out standards for hazardous waste treatment, storage and disposal units, which are intended to have hazardous wastes managed in a manner that minimizes the present and future threat to the environment and human health. The EPA delegated implementation of the RCRA program to the State of

California, which implements it through the California Hazardous Waste Control Law, discussed below. Future maintenance activities at the Project site that may generate or result in the handling of hazardous wastes could subject the Project to RCRA requirements.

Federal occupational safety and health regulations contain provisions with respect to hazardous materials management. The applicable federal law is the Occupational Safety and Health Act of 1970, as amended, which is implemented by the Occupational Safety and Health Administration (OSHA) (29 U.S.C., sec. 651-678). Federal OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) §§1910, et seq., are designed to promote worker safety, worker training, and a worker's right-to-know.

OSHA standards that are applicable to the proposed Project include standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR 1926.65 Appendix C), contains Compliance Guidelines for construction activities and includes occupational health and environmental controls to protect worker health and safety. These guidelines articulate the required health and safety plan(s) to be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures. Due to the potential existence of hazardous materials on-site during construction, adherence to applicable hazard-specific OSHA standards would be required to maintain worker safety.

State Level

In the State of California, the State Hazardous Waste Control Law (HWCL) is the primary statute establishing requirements that govern RCRA and non-RCRA hazardous waste. The Cal-EPA, Department of Toxic Substances Control (DTSC), is the primary regulatory agency administering the State hazardous waste program.

The authority to administer the Occupational Safety and Health Act to California has been delegated by the U.S. Department of Labor, based on its finding that California has a state plan with provisions at least as stringent as those required by the Act. Cal/OSHA is very similar to the Federal OSHA program. More specifically, Cal/OSHA regulates exposure to airborne contaminants (e.g., soil gases such as hydrogen sulfide) during construction under Title 8 of the California Code of Regulations, Section 5155, Airborne Contaminants, which establishes which compounds are considered a health risk; the exposure limits associated with such compounds; and protective equipment, workplace monitoring, and medical surveillance required for compliance. In addition, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program that is

required to cover the full range of workplace hazards, including those associated with hazardous materials.

In addition, Title 8 requires the labeling of any hazardous materials in conformance with the Labeling of Injurious Substance Standards of the General Industry Safety Orders and storage of materials in conformance with Housekeeping and Maintenance Standards of the General Industry Safety Orders and in conformance with Hot, Flammable, Poisonous, Corrosive, and Irritant Substances Standards of the General Industry Safety Orders. Title 8 regulations are administered on the local level, as discussed below.

Local Level

The lead agency regulating hazardous materials for the City of Los Angeles is the Los Angeles Fire Department (LAFD). The LAFD Fire Prevention and Public Safety Division administers Title 8 of the California Code of Regulations through participation in the Certified United Program Agency (CUPA), as approved by Cal-EPA. Under the CUPA program, the use and storage of any hazardous materials at quantities established by the Uniform Fire Code (UFC) as potentially hazardous must receive a permit for such materials. The permitting process requires the development of a Hazardous Materials Business Plan and Emergency Response Plan to be filed with the LAFD. In addition, businesses that store hazardous waste or hazardous materials must submit a Certificate of Disclosure to the LAFD. The LAFD maintains all public records regarding the use and storage of hazardous materials and conducts routine annual inspections to ensure that hazardous materials are handled and stored properly.

b. Existing Conditions

(1) On-site

(a) Current conditions

The Project site is located in Downtown Los Angeles, and includes Parcels Q, L, M-2, and W-1/W-2, which together comprise approximately 8.2 acres. Currently, all five parcels are utilized for vehicle parking. Parcels L, M-2, and W-1/W-2 are paved with asphalt and are each developed with surface parking lots surrounded by chain-link fencing. Parcel Q contains a three-story, steel frame parking structure. None of the parcels is listed as federal or state hazardous sites.

Surface staining is minimal on all five of the lots, and it is likely that the stains are the result of vehicles dripping motor oil. Cracks are visible on Parcels Q, L, M-2, and W-2. There is

no visible cracking on Parcel W-1. There are no complaints regarding excessive noise, discharges, or odors at the site that have been reported to the County or the City.

The only existing utility on site is electricity that powers the lighting systems used in the parking lots and is supplied by the Los Angeles Department of Water and Power (LADWP). Occurring along the perimeter of Parcel Q are shallow, concrete-lined gutters, presumably for storm-water collection. There is a shallow, concrete-lined drainage ditch occurring along the eastern edge of Parcel W-2 that empties into a storm water collection drain located in the northeast corner of the parcel.

(b) Previous Conditions

Parcels L and M-2 were dirt lots that had been utilized as staging areas for ongoing construction in the Bunker Hill area until 1983 or 1984, when the lots were paved. In addition, based on historical aerial maps, historical topographic maps, as well as historical fire insurance maps, all five parcels had been previously developed with apartments, hotels, or other dwelling types.

Based on a 1950 Sanborn map, a portion of Parcel Q was formerly used as fueling facility where gas and oil had been stored. There is no additional historical information available relating to the type of storage used or the volumes stored on the parcel. As part of a prior proposed development, a Phase II assessment of Parcel Q had been conducted to determine whether there was potential environmental impairment associated with the previously existing fueling facility. The investigation, performed by LeRoy Crandall and Associates, involved a soil gas survey and the conversion of four deep borings into monitoring wells. The investigation concluded that there was no evidence of soil or groundwater contamination on Parcel Q. In addition, a Phase II assessment that was conducted by Iris Environmental in August 2005 determined that soils on Parcel Q did not contain environmental contaminants that would cause those soils to be classified as hazardous. More specifically, the analysis indicated no materials detected at concentrations that would require specific health and safety measures during site redevelopment or mitigation measures for building construction. Iris Environmental also concluded that the four monitoring wells that were used during LeRoy Crandall's Phase II investigation likely still exist on Parcel Q.

According to Los Angeles Building and Safety Department records, a gas station existed in 1948 at 141 S. Hill Street which, based upon this address, would have been located along the approximate border between Parcels W-1 and W-2. In addition, a 1950 Sanborn map illustrates a structure on Parcel W-2 labeled "Gas and Oils" that could represent a gas station. Historical records do not indicate that this area had been previously graded or excavated. During the construction of the Metro Station that is located at the northeast corner of Parcel W-2, USTs

were discovered and removed. While the City of Los Angeles Building and Safety Department records and the general location labeled on the Sanborn map may be indicative of former USTs occurring at the site, there are no records available to support that the USTs removed during the construction of the Metro Station are the same USTs. Therefore, USTs associated with the potential gas station may occur at the site, and would be removed in accordance with local and state permits and regulations should they be encountered during redevelopment activities.

With regard to the existing Civic Mall and the area addressed by the Grand Avenue streetscape improvement program, no hazardous materials are anticipated to be present within these two Project components. However, definitive evidence to confirm whether hazardous conditions are present within portions of the Project site is not available. If hazardous materials are present within either the Civic Mall or the streetscape area, the potential for a significant impact could occur. Therefore, the mitigation section below ensures the application of regulatory procedures to address the potential for hazardous materials to be present within either the Civic Mall or the area associated with the proposed Grand Avenue streetscape improvements.

(c) Recognized Environmental Conditions (RECs)

RECs are defined by ASTM Standard E-1527-00 as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products onto structures on the property or into the ground, groundwater, or surface water of the property. According to the Phase I ESAs for Parcels Q, L, M-2, and W-1/W-2, there are no potential RECs at the Project site.

There is no evidence that polychlorinated biphenyls (PCBs) previously existed or currently occur on the site. Based on the site visit by Iris Environmental, there is no evidence at the site of asbestos; hazardous materials use, storage, or waste; drums and small containers; or air emissions. In addition, there is no indication of underground storage tanks (USTs) or aboveground storage tanks (ASTs) present, nor are USTs or ASTs listed in regulatory agency databases as existing or having previously occurred on the site. Industrial and sanitary wastewater is not generated at the site. The only non-hazardous material observed on-site is trash collected in receptacles located near the parking lot ticket booths at each of the parking lots.

(d) Additional Conditions

There are additional conditions identified at the Project site that generally would not present a material risk of harm to public health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies. However, these conditions, discussed below, are considered to warrant

further assessment. Regulatory procedures that focus on these conditions specifically are addressed later in this section.

- There are at two, and possibly four, unused groundwater monitoring wells located on Parcel Q. During a Phase II assessment of the parcel for a prior development proposed, four wells were located. However, the Phase I ESA for the Project confirmed the existence of only two of the wells, both of which are covered with Christy-type lids each labeled “well”. Two additional wells are believed to exist on the parcel.
- Hydrogen sulfide gas could be contained within the Fernando Formation bedrock underlying the Project site. Presence of the gas, which may be assessed only through subsurface sampling, could require health and safety measures during redevelopment and building construction.
- According to reports reviewed by Iris Environmental, shallow fill materials are present on Parcels Q, M-2 and W-2, as well as in the vicinity of the Project site. Thus, there is a potential for contaminants to exist in fill materials at elevated concentrations, which could result in the classification of soils as hazardous waste when submitted for reuse or disposal in off-site locations.

(2) Off-site

(a) Current Conditions

As described in Section 2.0, Project Description, the area surrounding the Project site is highly urbanized with a mix of land uses. Specifically, Parcel Q is located directly across Grand Avenue from the Walt Disney Concert Hall and across First Street from the Civic Mall, the Los Angeles County Courthouse and the Dorothy Chandler Pavilion. Parcels W-1/W-2 are also located directly across First Street from the Civic Mall. The Civic Center subway station of the Metro Red Line is located at the northeast corner of Parcels W-1/W-2. The Walt Disney Concert Hall is located directly to the north of Parcel L; the Grand Promenade Apartments, a high-rise residential use within the Bunker Hill Redevelopment Project Area, is located across Hope Street, to the west of Parcels L and M-2; and the Museum of Contemporary Art (MOCA) is located to the east, directly across Grand Avenue. Other surrounding uses include the Colburn School of Performing Arts and California Plaza to the east and the Wells Fargo Center, and the Sheraton Grand Hotel to the south and west.

(b) Previous Conditions

A Tank Closure Report was filed in 1990 by Parsons Company, Dillingham Construction, Inc. (PCDC) for the property located at 120 S. Olive Street, which is currently the Civic Center Metro Station. The report indicated that during construction of the Metro Station, two USTs of 500 and 1,000 gallons, respectively, were discovered and removed. Soil was excavated to approximately 15 feet below ground surface (bgs), and there were no visible or olfactory signs of petroleum contamination occurring in the soil. In addition, three soil samples were taken from a depth of 15 feet bgs, and samples were also collected from stockpiled soils. Materials detected in the soil samples were determined to fall below LAFD Applied Action Levels, and the stockpiled soils were classified as non-hazardous. The LAFD, the agency with local oversight, determined that further action was unnecessary.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of potentially hazardous conditions resulting from the presence of hazardous chemicals and substances that have been handled, stored, manufactured, disposed, or accidentally released at a Project site, or within a prescribed distance of a Project site, is based on a variety of factors. These include site inspection, historical records research, title search, interview of occupants and former users, review of fire department records, and review of state and federal databases of listed sites. ASTM guidelines establish the maximum acceptable distance of off-site hazardous sites from a project site. If the records review and on-site inspection indicates any existing or previous exposure of a property to on-site or off-site hazardous materials, additional analysis and testing of materials is generally carried out.

The analysis contained in this section is based on the aforementioned Phase I ESAs, which draw from data regarding existing and past uses, operations, and environmental conditions within the Project site. Specifically, the Phase I ESA for Parcels Q, L, M-2, and W-2 was based on interviews with government officials familiar with the parcels; a search of regulatory agency databases for the Project site and the Project vicinity; a U.S. Geological Survey review of historical and topographical maps associated with the site and surrounding areas; a review of historical aerial photographs; a review of historical fire insurance (Sanborn) maps; a review of preliminary geotechnical studies and a Phase II Site Assessment conducted by LeRoy Crandall and Associates for a prior development proposal; a review of the Parsons Company, Dillingham Construction, Inc. Tank Closure Report obtained from the LAFD; a review of the Status of Geotechnical Investigation and Preliminary Findings provided by The Related Companies; and a review of documents on file with LAFD. In addition, a site inspection was conducted by Iris

Environmental to determine the status of potential hazards and hazardous materials on Parcels Q, L, M-2, and W-2.

The Phase I ESA for Parcel W-1 was based on a search of regulatory agency databases for the Project site and the Project vicinity, and interviews with local government officials. A site inspection was not included as part of the Phase I Environmental Site Assessment of Parcel W-1; current private owners of Parcel W-1 declined access and therefore a site investigation by Iris Environmental was not possible. However, Iris Environmental did conduct a visual reconnaissance of the site's perimeter and of areas in the immediate vicinity.

b. Thresholds of Significance

Based on the factors set forth in the City of Los Angeles *CEQA Thresholds Guide* (1998), the proposed Project would have a significant impact with regard to hazards and hazardous materials if:

- Project activities would involve the disturbance, removal, storage, or disposal of hazardous materials, or;
- The Project would expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

c. Impact Analysis

(1) Project with County Office Building Option

(a) Construction

As discussed earlier, there are no potential Recognized Environmental Conditions (RECs) at the Project site. In addition, the Project site is located outside of the City of Los Angeles Engineering Department "Methane Zone."¹⁴⁰ As such, there would be a less than significant risk of encountering hazardous materials or potentially hazardous materials during Project construction.

Demolition, excavation, and construction of the Project site including the five parcels, the Grand Avenue streetscape, and the Civic Park, would involve the use of potentially hazardous

¹⁴⁰ Oral communication with Genevieve Proctor of Iris Environmental, March 30, 2006.

materials, including vehicle fuels, paints, cleaning materials, and caustic construction compounds. While the use of these substances would be temporary, they could pose a potential health risk to construction workers during demolition and excavation and to the general public during transport. As such, construction activities would occur in accordance with standard construction practices and manufacturer guidelines, as required by OSHA and Cal/OSHA.

With the implementation of applicable federal and state guidelines and statutes, and LAFD requirements for the handling of common hazardous materials, construction activities would not create a significant hazard to the public or environment through the disturbance, removal, storage or disposal of hazardous construction materials. As such, Project construction would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, and impacts would be less than significant.

(b) Operation

The Project with County Office Building Option comprises a mix of residential, commercial, retail, and recreational uses. Potentially hazardous materials used and stored during routine operation of the Project would include cleaning solvents typically used in multi-family residential and commercial development, pesticides and related chemicals associated with landscaping maintenance, and paints and solvents. Specifically with regard to the Civic Park and Grand Avenue streetscape, it is anticipated that hazardous materials including fertilizers, herbicides and pesticides would be used to maintain the greenscape of the park and associated landscaping, as well as the landscaping along the Grand Avenue streetscape.

Since the transport, use, and storage of these materials would be managed in accordance with applicable federal, state, and local regulations, these materials would not be expected to pose significant risks to the public or the environment. With the implementation of existing Cal-EPA and LAFD regulations, the proposed Project would not significantly expose people to hazardous substances and chemicals. The probable frequency and severity of consequences to people to a potential health hazard due to the transport, use and storage of common hazardous materials used in commercial cleaning and landscaping would therefore be less than significant.

In addition, there are no facilities that are upgradient or cross-gradient within a 0.5-mile radius listed on the RCRAInfo database (formerly the Resource Conservation and Recovery Act Information System [RCRIS]) of Transportation, Storage, and Disposal (TSD) facilities. The site is, however, located in the vicinity of several sites listed on the RCRAInfo TSD database and the RCRAInfo-LQG and SQG (Large and Small Quantity Hazardous Waste Generators) databases. More specifically, there are two upgradient or cross-gradient facilities within 0.25 mile of the site listed on the RCRAInfo-LQG database, at the John Ferraro Building—LADWP

at 111 North Hope Street and the Los Angeles Times building at 202 West First Street, respectively. No violations were recorded at either facility. Nine facilities either upgradient or cross-gradient within 0.25 mile of the site are listed on the RCRAInfo-SQG database. No violations were recorded at any of the listed facilities.

Furthermore, there are 16 facilities within 0.25 mile of the site listed on the Underground Storage Tank (UST) Registrations Database. Of the 16 facilities, five are downgradient of the site. The remaining 11 are upgradient or cross-gradient of the site, and are listed as having one current UST each. None of the 11 listed on any databases indicate a materials leak or spill, with one exception: the General Office Building is listed at 111 North Hope Street on the Leaking Underground Storage Tank (LUST) Information System database, but under the LADWP facility name. According to the LUST database, the Regional Water Quality Control Board (RWQCB) closed the case on October 29, 2004.

Based on its database review, it is determined that conditions surrounding the parcels would not likely be of material impact to the site. Consequently, Project operation would not expose people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As such, Project operation would not result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials, and impacts would be less than significant.

(2) Project with Additional Residential Development Option

In addition to the Project with County Office Building Option, an optional residential development scenario has been defined. The Project with Additional Residential Development Option provides for an additional 600 residential units in lieu of the 681,000 square feet of commercial office space proposed by the Project with County Office Building Option. All other components of the Project with County Office Building Option are the same under the Project with Additional Residential Development Option.

(a) Construction

As discussed above, there are no potential RECs on any of the parcels slated for development. In addition, the Project site is not located within a City of Los Angeles Engineering Department "Methane Zone." Thus, as with the Project with County Office Building Option, there would be a less than significant risk of encountering hazardous materials or potentially hazardous materials during construction of the Project with Additional Residential Development Option.

While the makeup of land uses under the Project with Additional Residential Development Option would differ somewhat from those of the Project with County Office Building Option through the additional 600 residential units, overall the quantity of new construction (i.e., total square footage) would be substantially similar. It is therefore anticipated that the same amount and type of construction would occur, and that the short-term use of potentially hazardous materials would be largely similar to construction of the Project with County Office Building Option. Given that use of these substances could pose a potential health risk to construction workers during demolition and excavation and to the general public during transport, construction activities would occur in accordance with standard construction practices and manufacturer guidelines, as required by OSHA and Cal/OSHA.

With the implementation of applicable federal and state guidelines and statutes, and LAFD requirements for the handling of common hazardous materials, construction activities associated with the Project with Additional Residential Development Option would not create a significant hazard to the public or environment through the disturbance, removal, storage or disposal of hazardous construction materials. Subsequently, as in the case with the Project with County Office Building Option, construction of the Project with Additional Residential Development Option would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, and impacts would be less than significant.

(b) Operation

Operation of the Project with Additional Residential Development Option would be substantially similar to operation of the Project with County Office Building Option and would not create significant hazard to the public or the environment. As discussed earlier, there are no RECs at the Project site, and the site is not listed in federal regulatory databases of hazardous materials. In addition, as discussed above, conditions surrounding the parcels would not likely be of material impact to the site, as determined by Iris Environmental.

Similar to the Project with County Office Building Option, potentially hazardous materials introduced into the Project with Additional Residential Development Option during operation would include substances typical of other residential and commercial developments throughout the City. The transport, use, and storage of these materials would be managed in accordance with applicable federal, state, and local regulations, and therefore these materials would not be expected to pose significant risks to the public or the environment. As such, compliance with manufacturer guidelines, along with applicable regulations, would reduce impacts associated with operation of the Project with Additional Residential Development Option to a less than significant level.

Given the above, and as in the case of the Project with County Office Building Option, operation of the Project with Additional Residential Development Option would not expose people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. In addition, operation of the Project with Additional Residential Development Option would not result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials, and impacts would be less than significant.

4. CUMULATIVE IMPACTS

Section III.B of the Draft EIR identifies the related projects that are anticipated to be developed within the vicinity of the Project site. The related projects span a wide range of uses, including residential, commercial, retail, office, schools, and restaurants. Under existing federal and state regulations, potential hazardous materials must be identified and remediated prior to construction and operation of any habitable facility. As such, any groundwater or soil contamination occurring on the related project sites would be addressed in accordance with applicable regulations during the permitting process by the applicable responsible agencies. Remediation activities would therefore be expected to reduce any significant impacts associated with hazardous materials to a less than significant level.

As analyzed above, compliance with federal, state, and local regulations would result in a less than significant impact with regard to hazardous materials during construction and operation of the Project with County Office Building Option or the Project with Additional Residential Development Option. As such, with monitoring and compliance with federal, state and local regulations and procedures, the potential for cumulative impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

5. MITIGATION MEASURES

The proposed Project would have less than significant impacts with regard to hazards and hazardous material. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure H-1: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall properly decommission all unused groundwater monitoring wells, per applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or

department, shall determine compliance with this measure with regard to the five development parcels. The Regional Water Quality Control Board shall enforce compliance with this measure.

Regulatory Measure H-2: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall test for the presence or absence of hydrogen sulfide and methane beneath the site by subsurface sampling. Should the sampling result in the discovery of hydrogen sulfide and/or methane, appropriate health and safety measures shall be implemented, in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure H-3: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall take fill samples from each of the five parcels, and shall analyze these samples for contaminants at elevated concentrations. Should elevated contaminant concentrations be discovered, appropriate measures shall be implemented, in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure H-4: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall undertake an appropriate investigation to ascertain whether any hazardous conditions would occur as a function of implementing the streetscape improvements along Grand Avenue and/or the Civic Park. Should elevated concentrations of contaminants be identified, appropriate measures shall be implemented in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure H-5: Prior to demolition or renovation in the Civic Center Mall, the responsible parties for implementation of the Civic Park under the applicable agreements shall perform an asbestos-sampling survey to determine the presence of asbestos containing materials. If such materials should be found, the responsible parties for implementation of the Civic Park shall prepare and implement an Operations and Maintenance Plan that meets all applicable federal, state and local requirements. This plan shall safely maintain asbestos containing materials that remain on the site. The County's

CAO and/or Department of Public Works shall determine compliance with this measure.

Regulatory Measure H-6: Prior to the start of any demolition activities or renovation on any painted surfaces at the Project site, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall conduct a survey of lead based paint (LBP) to determine the level of risk posed to maintenance personnel, construction workers, facility staff, and patrons from exposure to the paints present at the site. Any recommendations made in that survey related to the paints present at the Project site shall be implemented prior to the demolition or renovation of said painted surfaces. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts associated with the potential discovery of hazardous and non-hazardous materials on the Project site would be reduced to a less than significant level with compliance with the above regulatory measures.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
1. FIRE

1. INTRODUCTION

This section analyzes the proposed Project's impacts relative to the fire and emergency medical services (EMS) provided by the City of Los Angeles Fire Department (LAFD). The analysis evaluates the impact of the Project relative to LAFD service capacity, fire flow, emergency response times and distances, and fire safety equipment and facilities required by the City's Fire Code for new construction. This section is based on information provided by the Los Angeles Fire Department's (LAFD) Planning Section and Bureau of Fire Prevention and Safety.

2. ENVIRONMENTAL SETTING

Fire prevention, fire suppression, and life safety services are provided throughout the City of Los Angeles by the LAFD as governed by the Fire Protection and Prevention Plan (Plan) and the Safety Element of the City's General Plan, as well as the Fire Code section of the Los Angeles Municipal Code (LAMC). The Plan and the Fire Code serve as guides to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed in these documents include: fire station distribution and location, required fire flow, fire hydrant standards and locations, and the provision of emergency access provision.¹⁴⁰ In addition, the California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is a compilation of building standards, including fire safety standards for residential buildings. Specific CBC regulations regarding fire protection systems have been incorporated by reference into the LAMC.

The LAFD is a full-spectrum life safety agency and provides fire protection and emergency medical services to the entire City. There are 103 Neighborhood Fire Stations covering roughly 470 square miles within the LAFD jurisdiction. The LAFD's 3,562 uniformed personnel provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service to a population of approximately 4 million throughout the City of Los Angeles. At any given time,

¹⁴⁰ *Fire Protection and Prevention Plan, a part of the General Plan of the City of Los Angeles, adopted January 1979.*

there are a total of 1,045 uniformed firefighters, including 215 firefighter/paramedics, on duty. In addition, the LAFD employs 338 non-sworn technical and administrative support personnel.¹⁴¹

The City of Los Angeles Fire Code specifies maximum response distances allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements. For high density commercial land uses, the Fire Code indicates a maximum response distance of 0.75 mile to the nearest engine company and 1.0 mile to the nearest truck company. Where response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.).

The LAFD has identified the Project as being within the service area of Station Nos. 3, 4, 9, and 10, the locations of which are shown in Figure 47 on page 623.¹⁴² Due to the geographic extent of the Project, distances to the Project site vary depending on specific locations within the site. Notwithstanding, Fire Station No.3 is located less than 0.75 miles from all of the locations within the Project site (the distance from the easterly edge of Parcels W-1/W-2 is less than 0.50 miles). This station would experience the shortest response distance to all areas of the Project site in the event of an emergency. The LAFD utilized the intersection of Grand Avenue and First Street as the central address from which to calculate distances from the identified fire stations to the Project site.

Table 73 on page 624 lists the fire stations that would provide service to the Project site, their respective distances from the site, staffing, and equipment. As shown, Fire Station No.3 at 108 North Fremont Avenue is closest to the Project site, located 0.3 miles from the central address. This Task Force Station is furnished with a truck and an engine company, a paramedic and a Basic Life Support (BLS) rescue ambulance, and is staffed by 16 LAFD personnel. This facility serves as Division Headquarters. Fire Station No. 4 is located 1.1 miles from the site at 800 North Main Street and is staffed by 18 members. Equipment located at this facility includes a truck and an engine company, hazardous materials fire apparatus, a paramedic and a BLS rescue ambulance. Fire Station No. 9 is located approximately 1.3 miles from the Project area at 430 East Seventh Street. This Task Force Station is equipped with a truck company, two engines, two paramedic rescue ambulances, and is staffed by 17 LAFD personnel. This station serves as Battalion One Headquarters. Fire Station No. 10 is located approximately 1.5 miles from the Project area at 1335 South Olive Street. This Task Force Station is comprised of a truck and an engine company, a paramedic and a BLS rescue ambulance, and is staffed by 14 LAFD personnel.

¹⁴¹ LAFD website, <http://www.lafd.org/about.htm>, accessed January 5, 2006.

¹⁴² Fax to PCR from Captain II - Paramedic William Wells, LAFD Planning Section, January 10, 2006.

LEGEND

 Fire Station

 Project Site

No. 3: 108 N. Fremont Ave,
Los Angeles, CA 90012

No. 4: 800 N. Main St,
Los Angeles, CA 90012

No. 9: 430 E 7th St,
Los Angeles, CA 90012

No. 10: 1335 S Olive St,
Los Angeles, CA 90015

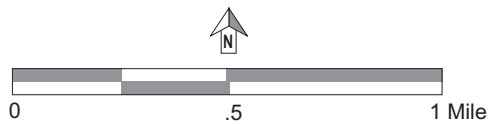
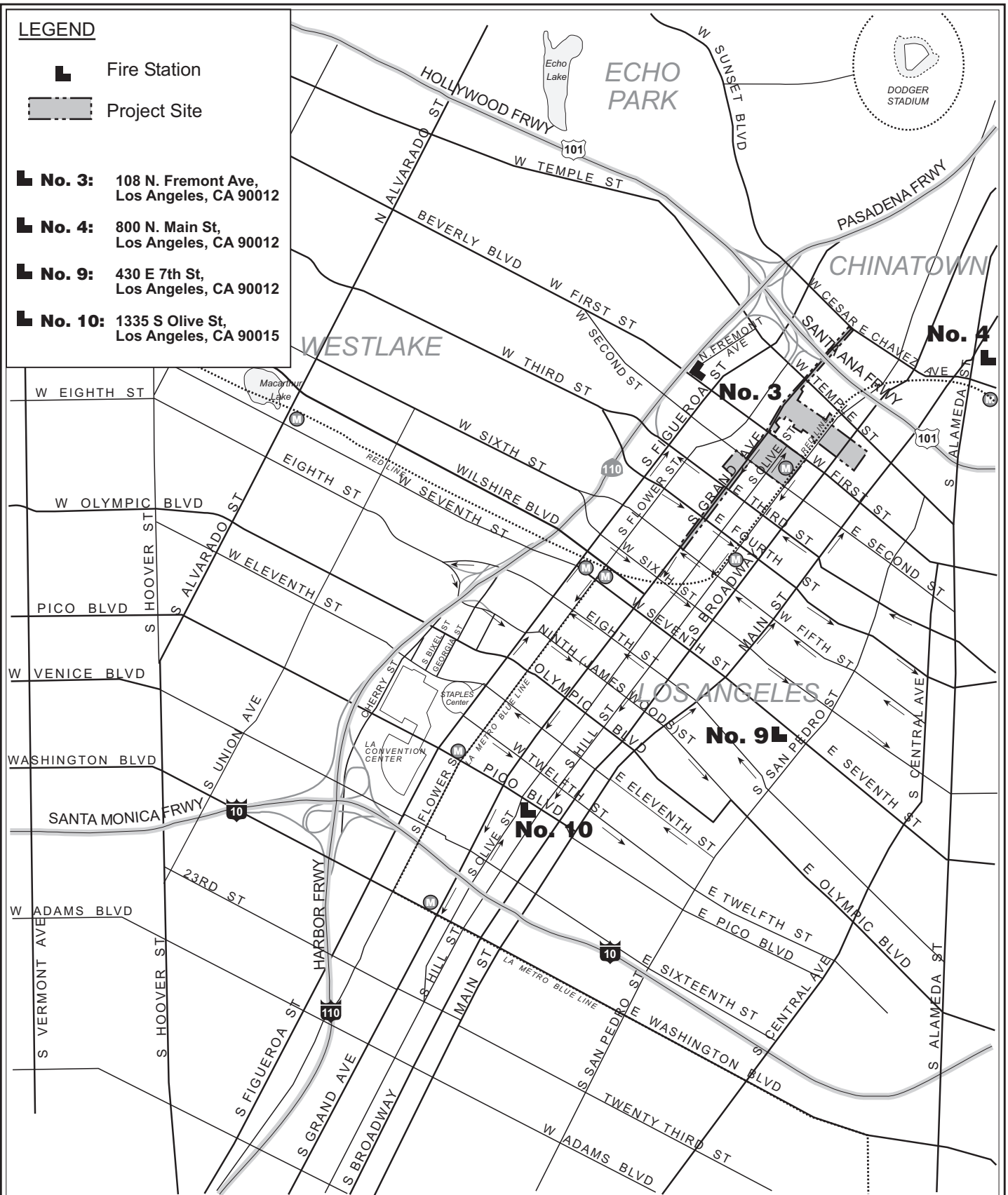


Figure 47
City of Los Angeles Fire Stations

Source: PCR Services Corporation, 2006

Table 73

City Fire Facilities Within the Vicinity of the Project Site

City Fire Facility	Distance	Staffing	Equipment
Fire Station No 3 Central Division Headquarters 108 North Fremont Avenue	0.3 miles	Light Force (Truck and Engine): 6 Fire Engine: 4 Paramedic Rescue Ambulance: 2 BLS Rescue Ambulance: 2 Division Command Team: 2 Total: 16 members at all times.	Task Force Truck and Engine Company Paramedic Ambulance BLS Rescue Ambulance
Fire Station No. 4 800 North Main Street	1.1 miles	Light Force (Truck and Engine): 6 Fire Engine: 4 Hazardous Materials Squad: 4 Paramedic Rescue Ambulance: 2 Basic Life Support (BLS) Rescue Ambulance: 2 Total: 18 members at all times.	Task Force Truck and Engine Company Hazardous Materials Fire Apparatus Paramedic Ambulance BLS Rescue Ambulance
Fire Station No. 9 Battalion 1 Headquarters 430 East Seventh Street	1.3 miles	Truck Company: 5 Fire Engines : 8 Paramedic Rescue Ambulances: 4 Total: 17 members at all times.	Task Force Truck and Engine Company 2 Fire Engines 2 Paramedic Ambulance
Fire Station No. 10 1335 South Olive Street	1.5 miles	Light Force (Truck and Engine): 6 Fire Engine: 4 Paramedic Rescue Ambulance: 2 Basic Life Support (BLS) Rescue Ambulance: 2 Total: 14 members at all times.	Task Force Truck and Engine Company Paramedic Ambulance BLS Rescue Ambulance

Source: Fax to PCR from Captain II - Paramedic Wells, LAFD Planning Section, January 10, 2006.

The LAFD provides average response times according to the following two categories: response times to EMS incidents and response times to fire incidents. As mentioned previously, the LAFD utilized the intersection of Grand Avenue and First Street as the central address from which to calculate response times from the identified fire stations to the Project. Table 74 on page 625, shows average response times for each individual station serving the site. With the exception of the average response time to fire incidents from Fire Station No.3, all response times from Station Nos. 3, 4, 9, and 10 are below the Citywide averages of 5.5 minutes to EMS incidents and 5.4 minutes to fire incidents.

Table 74

Fire Department Response Times to Project Site and Summary of Calls for Service

Fire Station	Address	Distance	Response Time to Site	Average EMS Incidents per Day	Average Response Times	Average Fire Incidents per Day	Average Response Times
3	108 N. Fremont St.	0.3	3.1 minutes	7.6	5.3 minutes	3.3	5.9 minutes
4	800 N. Main St.	1.1	5.1 minutes	9.8	4.6 minutes	1.8	5.3 minutes
9	430 E. 7th St.	1.3	5.6 minutes	28.8	4.8 minutes	5.5	5.3 minutes
10	1335 S. Olive St.	1.5	6.1 minutes	19.4	4.9 minutes	4.7	4.9 minutes

Source: PCR Services Corporation, 2006

Fire flow, the quantity of water available or needed for fire protection in a given area, is another important factor in fire suppression activities. Fire flow is normally measured both in gallons per minute (gpm) and duration of flow. The quantity of water necessary for fire protection varies by land use type, life hazard, occupancy, and the degree of fire hazard. Based on these factors, the LAFD requires flows ranging from 2,000 gpm from three adjacent fire hydrants flowing simultaneously in low density residential areas, to 12,000 gpm available to any city block in high density commercial or industrial areas. High density areas (i.e. high density commercial, principal business districts), in which simultaneous fires might occur, may require an additional 2,000 to 8,000 gpm above these standards.¹⁴³ A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system, while the necessary gpm is flowing, in order to be considered adequate by Fire Code standards.¹⁴⁴

3. PROJECT IMPACTS

a. Methodology

Fire service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the proposed

¹⁴³ *Fire Code of the Los Angeles Municipal Code, Section 57.09.06.*

¹⁴⁴ *Ibid.*

Project.¹⁴⁵ Changes in these factors resulting from the proposed Project may increase the demand for services. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis to determine if a proposed project would require additional equipment, personnel, or facilities and to review a project's emergency features. Beyond the standards included in the Los Angeles Fire Code, consideration is given to project size, proposed uses, required fire-flow, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials.

b. Thresholds of Significance

Based on the factors set forth in the City of Los Angeles Draft CEQA Thresholds Guide (1998), a significant impact to LAFD fire prevention and suppression services and/or emergency medical services would occur if the proposed Project would:

- Cause a substantial increase in emergency response times as a result of increased traffic congestion; or
- Exceed the capability of existing fire stations and emergency personnel to serve the Project site.

c. Impact Analysis

As discussed in Section 2.0 Project Description, the Project with County Office Building Option consists of the following components: the creation of a 16-acre Civic Park that includes, and expands upon, the Civic Mall, which would connect Los Angeles City Hall to Grand Avenue; streetscape improvements along Grand Avenue between Fifth Street and Cesar E. Chavez Avenue; and development of five parcels with up to 2,060 residential units; up to 275 hotel rooms; up to 449,000 square feet of retail space (plus 15,000 square feet of hotel meeting space and 10,000 square feet for a restaurant within the Civic Park); and up to 681,000 square feet of County office building space. In lieu of the 681,000 square feet of County office building space, up to 600 additional residential units may occur, under the Project with Additional Residential Development Option. Under the Project with Additional Residential Development Option, the total Project would consist of up to 449,000 square feet of retail space (plus 15,000 square feet of hotel meeting space and 10,000 square feet for a restaurant within the Civic Park), up to 275 hotel rooms, no County office building space, and up to 2,660 residential units. In addition to the permanent increase in residents and employees attributable to the Project, Project development would result in an increase in visitors associated with the Civic

¹⁴⁵ LA CEQA Thresholds Guide, 1998.

Park, the streetscape improvements, and the retail component. Thus, Project implementation would increase the demand on LAFD services.

(1) Project with County Office Building Option

(a) Construction

Construction activities may temporarily increase the demand on fire services due to the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources. Heat or fire sources may include machinery and equipment sparking, exposed electrical lines, welding activities, chemical reactions in combustible materials and coatings, and lighted cigarettes. The Project during its construction would comply with OSHA and Fire and Building Codes regarding site safety. Since the Project would comply with existing codes, any additional demand on fire services would not exceed the current capabilities of the LAFD and, therefore, impacts would be less than significant.

Construction of the Project may result in temporary lane closures in the immediate area of the Project. The LAFD shall be notified of all construction scheduling in order to plan appropriate alternative response routes. Public detour routes would be established where required to divert traffic from the affected street segments. Due to the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, street and/or lane closures are not anticipated to significantly affect emergency access or emergency response times. In addition, emergency vehicle access to adjoining and nearby properties would be maintained at all times. Furthermore, project construction would comply with all LAFD code and ordinance requirements. The LAFD's ability to respond to emergency incidents would not be significantly impacted by construction activities.

Traffic associated with construction activities would potentially affect emergency access. Although construction of the Project would contribute to traffic levels in the area, both construction worker and truck trips would be predominantly freeway-oriented and would generally occur during off-peak hours. Fire and emergency medical vehicles can generally respond to the Project site area without the use of nearby freeways. Given the generally acceptable levels of service (LOS) at intersections in the vicinity of the Project site during peak and off-peak hours, impacts on area surface streets would be minimal. Thus, LAFD emergency response times would not be significantly impacted by construction traffic.

(b) Operation

The Project would comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan Element, as well as the Safety Element, both of which are elements of the General Plan of the City of Los Angeles.

The adequacy of fire protection for a given area is based on required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in the area. In general, the required fire flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.¹⁴⁶ Implementation of the Project with County Office Building Option, including the generation of up to roughly 2,925 new residents and approximately 3,930 employees, would create an increased demand on LAFD fire services and facilities. In addition, events associated with the proposed Civic Park would generate high levels of occupancy and traffic on an intermittent basis.

The Project site is located approximately 0.3 miles from Fire Station No.3, the nearest engine and truck company. This response distance is within City Fire Code requirements, and thus, the Project would have no impacts relative to LAFD response distance. Notwithstanding, the Project would be required to install automatic fire sprinkler systems in all structures. Fire hydrants with the required fire flow would also be installed per LAFD specifications. In addition, supplemental fire protection devices (e.g., fire alarms, fire extinguishers, emergency exits, etc.) would be incorporated into new Project structures, as required by the Fire Code. Further, as the Project site is within the service area of four Task Force truck and engine companies, no significant impacts to LAFD staff and equipment capabilities are anticipated. Notwithstanding, Project Design Features and Mitigation Measures are identified below to reduce potential impacts. .

Events at the Civic Park could result in considerable traffic congestion on area streets, at intersections, and freeway on- and off-ramps in the vicinity of the Project site. This traffic congestion could potentially cause delays in LAFD emergency response times for responses within or through the Project site. Mitigation measures have been developed to reduce this potentially significant impact to a less than significant level.

With regard to fire flow requirements, 4,000 gpm from four adjacent hydrants is generally required for high density residential and commercial uses. However, due to the Project site's location in the downtown area, the LAFD has determined fire flow required for the Project

¹⁴⁶ Letter from Douglas Barry, Assistant Fire Marshal, LAFD Bureau of Fire Prevention and Public Safety, December 19, 2005.

to be 12,000 gpm from eight fire hydrants flowing simultaneously.¹⁴⁷ Based on the analysis presented in Section IV.N, Water, of this Draft EIR, the Los Angeles Department of Water and Power (LADWP) has indicated that sufficient fire flow currently exists to serve the Project site. As such, Project impacts with regard to fire flow are concluded to be less than significant.

(2) Project with Additional Residential Development Option

The Project with Additional Residential Development Option provides for an additional 600 residential units in lieu of the 681,000 square feet of County office building space proposed by the Project with County Office Building Option. All other components of the Project are the same under the Project with Additional Residential Development Option.

(a) Construction

For the purpose of analysis, it is anticipated that while the design of the residential structures may be markedly different than that of the offices under the Project with County Office Building Option, overall the quantity of new construction (i.e., total square footage) would be substantially similar. As such, it is anticipated that the same amount and type of construction would occur and, subsequently, that similar short-term impacts would result. Such impacts, as in the case with the Project with County Office Building Option, would be less than significant, since the Project in either case would comply with existing LAFD requirements, emergency response times would not be significantly impacted by the Project's construction and emergency vehicle access to adjoining and nearby properties would be maintained at all times.

(b) Operation

Potential impacts to fire services would be comparable to those of the Project with County Office Building Option as development under the Project with Additional Residential Development Option would comply with all Fire Code provisions, the distances from the fire stations would be unchanged (i.e., response times to the Project site would be the same), the replacement residential buildings would be fully sprinklered, fire flow requirements and the ability of the water conveyance system in the Project area to deliver those flows would be the same. Therefore, as is the case with the Project with County Office Building Option, impacts of the Project with Additional Residential Development Option with regard to fire protection services would be less than significant.

¹⁴⁷ *Ibid.*

4. CUMULATIVE IMPACTS

The LAFD has determined that development of the Project with County Office Building Option, in conjunction with other approved and planned projects, may result in the need for the following: (1) increased staffing at existing facilities; (2) additional fire protection facilities; and (3) relocation of existing fire protection facilities. However, as related project applicants would be required to coordinate with the LAFD to ensure that related project construction and operations would not significantly impact LAFD services and facilities, no significant cumulative impacts are anticipated.

5. MITIGATION MEASURES

The proposed Project would have less than significant impacts with regard to fire services. Notwithstanding, the following regulatory measures and project design features have been identified to address the Project's less than significant impact.

a. Construction

Regulatory Measures

Regulatory Measure I.1-1: During demolition activities occurring during each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure sure that emergency access shall remain clear and unobstructed. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County Fire Department (LACoFD) shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-2: Prior to each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall prepare, and thereafter implement, plans and specifications to ensure that the construction contractor is apprised of the requirement to maintain access to sub-surface parking structures associated with the Civic Center Mall, the Music Center, and the Colburn School for Performing Arts. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-3: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall maintain access for emergency response personnel to the Kenneth Hahn Hall of Administration, the Paseo de los Pobladores de Los Angeles, the County Courthouse, the Colburn School for Performing Arts, and the Walt Disney Concert Hall. The LAFD shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-4: Prior to each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, a plan to ensure that emergency evacuation from the northwest side of the County Mall and Colburn School for Performing Arts, the southeast side of the Music Center and the Walt Disney Concert Hall would not be impeded by construction of the individual Project elements. With respect to the plan for the Mall, it must be prepared to coordinate with emergency evacuation plans for the Courthouse and the Hall of Administration. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-5: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that sufficient fire hydrants shall remain accessible at all times during Project construction. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-6: Prior to the start of each construction phase and during Project operations, Related, with regard to the five development parcels shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, and the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708). The City of Los Angeles Fire Department (LAFD) shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-7: During Project operations, Related, with regard to the five development parcels shall maintain all access roads, including fire lanes, in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code. The LAFD shall determine compliance with this measure with regard to the five development parcels.

b. Operations

Regulatory Measures

The following regulatory measures for fire protection and services are based on information provided by the LAFD¹⁴⁸ and shall be implemented for the Project:

Regulatory Measure I.1-8: Prior to the start of each construction phase, Related, with regard to the five development parcels and the responsible parties for implementation of the Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications in accordance with LAFD requirements, and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the five development parcels or the Streetscape Program. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

Regulatory Measure I.1-9: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall prepare, and thereafter implement, plans in accordance with LACoFD requirements, and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the Civic Park. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-10: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, a plan that will assure that any required fire hydrants that are installed shall be fully

¹⁴⁸ Letter from Douglas Barry, Assistant Fire Marshal, LAFD Bureau of Fire Prevention and Public Safety, December 19, 2005.

operational and accepted by the Fire Department prior to any building construction. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-11: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall submit plot plans indicating access roads and turning areas to the LAFD for review and approval. Related, with regard to the five development parcels shall implement the approved plot plans. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-12: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, engineering plans that show adequate fire flow and placement of adequate and required public and private fire hydrants. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-13: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall provide emergency access for Fire Department apparatus and personnel to and into all structures. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-14: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that will provide that any private roadways for general access use and fire lanes shall not be less than 20 feet wide and clear to the sky. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-15: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that will provide that any fire lanes and dead end streets shall terminate in a cul-de-sac or other approved turning area. No dead end street or fire lane shall be greater than 700 feet in length or secondary access

shall be required. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-16: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that designs any proposed development utilizing cluster, group, or condominium design not more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-17: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that designs fire lanes to be not less than 28 feet in width. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-18: Prior to the start of each construction phase, Related, with regard to the five development parcels, where above ground floors are used for residential purposes, shall prepare, and thereafter implement, a plan that interprets the access requirement as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of the residential units. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-19: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall prepare, and thereafter implement, a plan that designs the entrance or exit of all ground level residential units to be no more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-20: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides access that requires the accommodation of Fire Department apparatus, shall design the minimum outside radius of the paved surface to be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-21: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall not construct any building or portion of a building to be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-22: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall prepare, and thereafter implement, a plan that provides for access that requires accommodation of Fire Department apparatus, a design for overhead clearances to be not less than 14 feet. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-23: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides for additional vehicular access required by the Fire Department, where buildings exceed 28 feet in height. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-24: Prior to the start of each construction phase, Related, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides, where fire apparatus shall be driven onto the road level surface of the subterranean parking structure, for the structure to be engineered to withstand a bearing pressure of 8,600 pounds per square foot. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-25: Prior to the start of each construction phase, Related, with regard to the five development parcels shall record any private streets as Private Streets and Fire Lanes. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-26: During operation of the Project, Related, with regard to the five development parcels, shall provide that all electric gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety, or other appropriate City agency or department, granting a Certificate of Occupancy. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-27. Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall prepare, and thereafter implement, a plan that would not construct any building or portion of a building more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel with the exception that dwelling unit travel distance shall be computed to the front door of the unit. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-28. Prior to the start of each construction phase, Related, with regard to the five development parcels shall submit plans to the Fire Department for review and approval. Where rescue window access is required, Related, with regard to the five development parcels, shall incorporate conditions and improvements necessary to meet accessibility standards as determined by the LAFD. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-29. During operations of the Project, Related, with regard to the five development parcels shall have the curbs of all public street and fire lane cul-de-sacs painted red and/or be posted “No Parking at Any Time” prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-30. During operations of the Project, planning for large events at the Civic Park shall be implemented by the County or County Park Operator to reduce potential adverse affects on emergency access. As part of the planning process, representatives of the LACoFD, County Office of Public Safety, LAFD, LAPD and LADOT shall be advised of the activities and consulted to establish appropriate procedures for crowd and traffic control. Plans shall be submitted to the County Chief Administrative Officer for review and approval.

Project Design Feature

Project Design Feature I.1-1: Prior to the start of each construction phase, Related, with regard to the five development parcels shall submit building plans to the LAFD for review and approval that demonstrate that automatic fire sprinklers shall be installed in all structures. The LAFD shall determine compliance with this measure.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

After compliance with all fire safety regulations, the incorporation of Project Design Features and the implementation of mitigation measures, no significant unavoidable impacts are anticipated with respect to fire services. With the implementation of the above listed measures, impacts would be reduced to a less than significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
2. POLICE

1. INTRODUCTION

This section addresses impacts on police services that would arise from increased population, traffic, and construction activities associated with the proposed Project. The focus of the analysis is on the Los Angeles Police Department (LAPD) facilities that currently serve the Project site and the ability of the LAPD to provide police services to the Project. This section is based on information provided by the LAPD's Central Area, the Information Technology Division and input from the Crime Prevention Unit.

2. ENVIRONMENTAL SETTING

Police protection services for the Project site are provided by the LAPD. The LAPD is comprised of 18 community stations operated by four geographically located bureaus: the Central, South, West, and Valley Bureaus. LAPD also provides a variety of support systems including the Direct Support Division, Special Operations, Municipal Division, SWAT, K-9, and the Mounted Unit. The Project site is located in the Central Bureau service area, which covers a 66.85-square-mile area and administers operations from the following five Community Police Stations: (1) Central, (2) Rampart, (3) Hollenbeck, (4) Northeast and (5) Newton.

The Project site is located within the LAPD's Central Area which encompasses an approximately 4.83 square mile area bounded roughly by Lilac Terrace, Lookout Drive, and the Harbor/Pasadena (110) Freeway to the north, the Los Angeles City Boundary to the east, Sunset Boulevard and the Harbor/Pasadena (110) Freeway to the west, and Washington Boulevard, Maple Street, and Seventh Street to the south.¹⁵⁰ The LAPD Central Area is subdivided into 52 reporting districts, which are small geographic units used for resource deployment purposes and statistical analysis.¹⁵¹ The Project site falls within the following six Reporting Districts: 111, 112, 122, 123, 132 and 142. The boundaries for the six Reporting Districts are Cesar E. Chavez to the north, Broadway and Grand Avenue to the east, Fifth Street to the south, and Flower Street to the west. The Central Community Police Station at 251 East Sixth Street is located less than

¹⁵⁰ *Letter from Officer Tanya Hanamaikai, Community Relations Section, Crime Prevention Unit, November 29, 2005.*

¹⁵¹ *Draft City of Los Angeles Citywide CEQA Technical Guide, August 1998.*

one mile south of the Project site and would provide police services to the Project. Figure 48 on page 640 depicts the Reporting Districts for the Project and the service boundary for the Central Area Police Station.

a. Existing Conditions

There are roughly 3,978,000 persons within the LAPD's 473.14 square-mile jurisdiction. The LAPD deploys 8,328 sworn personnel, and thus, the ratio of officers per resident is roughly one officer for every 478 residents. The Project site is located within the LAPD Central Area Police Station service area which is the headquarters for the Central Area. The LAPD Central Area has a population of 43,748 and deploys 337 sworn personnel over three watches. In addition to sworn personnel, there are 30 civilian employees. Based on this data, the officer-resident ratio is approximately one officer per 130 residents as compared to the Citywide ratio of one officer per 478 persons. This difference is most likely attributable to the unique characteristics of the downtown area (i.e., extremely high daytime population, greater numbers of homeless, etc.)

The total area of the Reporting Districts serving the Project area within the LAPD Central Area is approximately 0.7 square miles. The LAPD does not keep records of the populations within each of the individual Reporting Districts due to the area's transient and undocumented populations. Nevertheless, the transient, or homeless, population is currently estimated to be 10,000 persons.¹⁵² The LAPD also assumes that, in certain geographical areas, populations may be two to three times higher than estimated due to multiple families sharing a single dwelling unit.¹⁵³ Therefore, the number of officers serving the Central Station is based on the amount of crimes committed versus the station's service population.¹⁵⁴ The allocation of sworn personnel throughout the LAPD is determined according to the crime statistics generated by the Department's computerized crime control model, COMPSTAT. Personnel deployment is reviewed on a monthly basis.¹⁵⁵

In 2004, there were 154 crimes committed per 1,000 residents in the LAPD Central Area and 424 crimes committed per 1,000 residents Citywide.¹⁵⁶ Thus, based on population, the

¹⁵² Telephone conversation with Detective Smith of the LAPD Central Area Detective Unit, December 12, 2005.

¹⁵³ Telephone conversation with Officer Perkins, Crime Prevention Unit, December 12, 2005.

¹⁵⁴ *Ibid.*

¹⁵⁵ *Ibid.*

¹⁵⁶ Statistical information is based on 2004 Los Angeles Police Department Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 report.

LEGEND

 Reporting Districts for Project

 Central Area Police Station

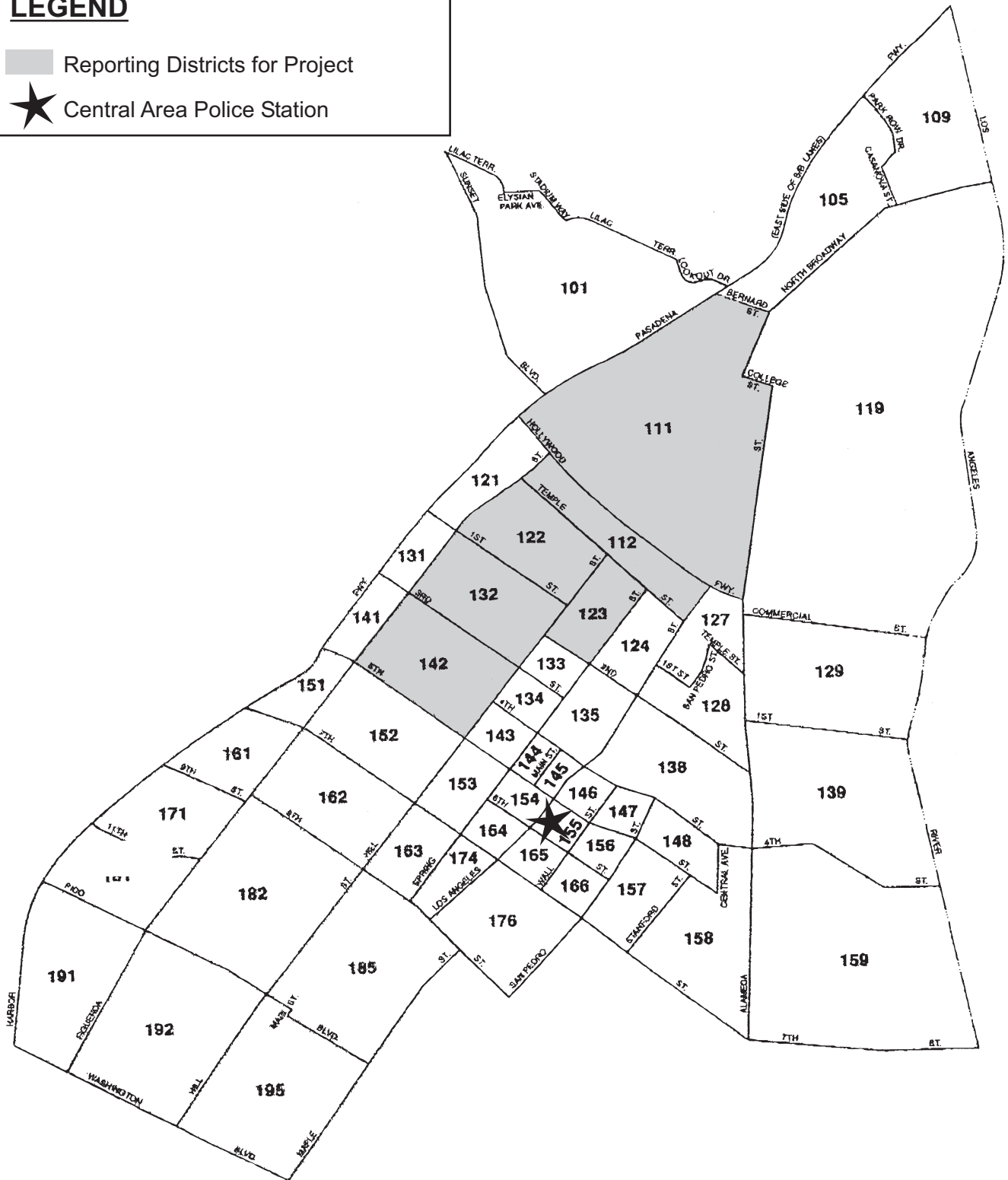


Figure 48
Location of Reporting
Districts and Police Station

Source: Research Division, 2005

Citywide crime rate was much higher as there were far fewer crimes committed per population in the LAPD Central Area. However, as shown in Table 75 on page 642, the number of crimes committed that each officer handles on an average basis was the same in the LAPD Central Area as it was Citywide; approximately 20 per officer.

Numbers of selected crimes and attempts by crime category were obtained for all six Reporting Districts, the LAPD Central Area, and Citywide and are shown in Table 75. According to LAPD crime statistics, the predominant crimes Citywide, as well as in the Central Area, were burglaries from vehicles, theft, aggravated assault and robberies, respectively. The Reporting Districts serving the Project area also reported a predominance of burglaries from vehicles, theft, aggravated assault and robberies. However, there were slightly fewer incidences of aggravated assault as compared to robberies. The average response time to emergency calls in the LAPD Central Area during 2004 was 6.0 minutes which compares favorably with the Citywide average of 6.5 minutes.

The existing demand for police services at the Project site is considered minimal as much of the Project site is currently developed with surface parking. In addition, according to the LAPD, calls for service to the existing Civic Mall are minimal due to the presence of occupied government buildings and associated police, employee, and visitor activities which serve as deterrents to homeless encampments and other illicit activities.

3 PROJECT IMPACTS

a. Methodology

The demand for police services relates to the population, the geographic area served, the number and the type of calls for service, and other characteristics of the community. In the event that a project affects these factors, the demand for LAPD services may be increased. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services in the Area serving the Project site. The analysis presents statistical information, based on COMPSTAT data as provided by LAPD's Crime Prevention Unit, for three geographical areas: (1) the six Reporting Districts serving the Project site, (2) the Central Area (Station), and (3) Citywide. Data include the ratio of officer per residents, major crimes and arrests per capita, and arrests per officer in the LAPD Central Area and Citywide.¹⁵⁷ The determination of impacts on LAPD services and personnel is based on the potential for the annual average number of crimes that each officer handles in the division substantially exceeds Citywide averages. The Project's estimated population is multiplied by the district's annual per

¹⁵⁷ Data for the RDs is limited to the number of crimes committed as detailed population data is unavailable.

Table 75

**2004 Crime Statistics
Crimes by Reporting District**

Type of Crime	RD 111	RD 112	RD 122	RD 123	RD 132	RD 142	Total RDs	Central	Citywide
Theft	175	12	27	20	35	83	352	3,167	76,984
Burglary	124	11	10	18	30	47	240	1,674	48,451
Aggravated Assault	33	4	3	5	5	6	56	926	26,930
Robbery	39	6	1	6	3	11	66	874	14,179
Rape	3	0	1	1	0	1	6	65	1,267
Murder	0	0	0	0	0	0	0	10	526
Bunco	0	0	0	0	0	0	0	28	169
Total	374	33	42	50	73	148	720	6,744	168,506

Reporting District	Population	Crimes	Crimes per 1000 Persons	Officers	Officer per Population	Crimes Handled per Officer
Total RDs	6,342	720	108	49	130	14.7
Central	43,748	6,744	154	337	130	20
Citywide	3,978,000	168,506	424	9,024	441	19

Source: 2004 Los Angeles Police Department Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 report.

capita crime and arrest averages to determine the comparative effects of the Project on average annual arrests per officer. The estimated population increase includes population from residential uses and commercial uses, per police service conversion factors set forth in the City of Los Angeles' CEQA Thresholds Guide.

b. Thresholds of Significance

The Project would result in a significant impact on police protection services provided by the LAPD if it would result in any of the following:

- Generate demand for additional police protection services that substantially exceeds the capability of the LAPD to serve the Project site; or
- Cause a substantial increase in emergency response times as a result of increased traffic congestion and/or limited emergency access, during either construction or operation of the Project.

c. Project Design Features

The proposed Project would provide for on-site security consisting of personnel and equipment. The proposed Project would also incorporate the following design features to facilitate and ensure on-site security:

- Lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Lighting of building entries and pedestrian walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Public spaces designed to be easily patrolled and accessed by safety personnel; and
- Design of entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

d. Impact Analysis

(1) Project with County Office Building Option

(a) Construction

Construction of the proposed Project may result in temporary lane closures in the immediate Project area. It is anticipated that the lanes nearest to each Development Parcel would be closed temporarily during construction activities on that parcel. Public detour routes would be established, where required, to divert traffic from the affected street segments. Traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Due to the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, street and/or lane closures would not be expected to significantly affect emergency access or emergency response times. Further, the LAPD would be notified of all construction scheduling in order to plan appropriate alternative response routes. With coordination between the Project's construction managers and the LAPD, the potential impact of construction on emergency access and response times would be reduced to a less than significant level.

The LAPD Central Area Community Police Station is centrally located within its service area. Police vehicles can generally respond to sites throughout its service area without the use of nearby freeways. Although construction of the proposed Project would contribute to traffic

levels in the area, both construction worker and truck trips would be predominantly freeway-oriented and would generally occur during off-peak hours. Given the proximity of regional freeways and the generally acceptable levels of service (LOS) at intersections in the vicinity of the Project site during off-peak hours, impacts on area surface streets would be minimal. Although minor traffic delays may result, particularly on freeway ramps, these impacts would be temporary in nature and therefore not significant. As such, LAPD emergency response times would not be significantly impacted by construction traffic associated with the Project. Therefore, impacts would be less than significant.

During construction, the on-site storage of construction equipment and building materials could result in theft. This may potentially necessitate police involvement unless adequate safety and security measures are implemented. A mitigation measure has been developed to reduce this potentially significant impact during construction to a less than significant level.

(b) Operation

As discussed in Section II, Project Description, one of the main objectives for the Civic Park is to create a central gathering place for all residents of the City with this being realized through a program of ongoing and special civic events and activities. In addition, development under the Project with County Office Building Option would consist of up to 2,060 residential units, 412 of which would be provided as affordable housing; up to 275 hotel rooms; up to 449,000 square feet of retail space (plus 15,000 sq.ft. of hotel meeting space and 10,000 sq.ft. for a restaurant within the Civic Park); up to 681,000 square feet of County office building; and up to 4,925 parking spaces. With an estimated average household size of 1.42 persons, the residential component of the Project with County Office Building Option would generate approximately 2,925 new residents. Using Police Service Population Conversion Factors for commercial uses, the commercial component is estimated to generate a population of 4,559.¹⁵⁸ For the purpose of analyzing potential impacts related to police services, the total population for the Project with County Office Building Option, inclusive of residential and commercial components, is 7,484. With the development, crimes associated with the proposed uses are anticipated to occur, placing an increased demand on police protection services.

¹⁵⁸ *The Los Angeles Police Department measures service ratios on the basis of residential populations. At a City-wide scale this practice recognizes that citizens act as both residents and employees, and are thereby accounted for in the more inclusive residential category. However, to provide a more conservative analysis and account for the Project's localized commercial activities, the analysis of impacts on police services includes the Project's commercial population, and treats that population as though they were residents and thus, contributors to the LAPD per resident ratios. The population conversion factors for the commercial activities are taken from the City of Los Angeles CEQA Thresholds Guide, May 14, 1998. The factors are 4 persons per 1,000 sq.ft. of office space, 3 persons per 1,000 sq.ft. of retail space and 1.5 persons per hotel room..*

The population growth attributed to the Project with County Office Building Option would reduce the existing police officer per resident ratio. With the addition of the site population of 7,484,, the officer per resident ratio in the LAPD Central Area would be reduced from 1 officer per 130 residents to 1 officer per 152 residents. Nonetheless, this ratio, as discussed previously, compares favorably to the Citywide officer/resident ratio. Assuming that the Project's population would generate a demand for police protection services in accordance with available statistical data for the Central LAPD Area, there would be approximately 1,153 additional crimes per year. Thus, the average number of crimes committed annually in the LAPD Central Area would increase from roughly 6,744 to 7,897. With the same number of officers as under existing conditions the ratio of crimes to be handled by each officer would increase from approximately 20 for each officer to 23.4 for each officer, an increase of 3.4 for each officer. This level of increased demand when viewed in the context as occurring over the entire year is concluded to not constitute a substantial exceedance of LAPD's capacity and, thus, a less than significant impact on the demand for LAPD services would occur.

Increased activity within the revitalized Civic Park would likely result in an increased demand for police protection services. Through the provision of private security personnel in the park, the demand for police protection services provided by the LAPD is not anticipated to increase over existing conditions. During special and large civic events, security staff would be added commensurate with the attendance at each event to assure the public's safety. With coordination between the operators of the Civic Park and the LAPD, potential impacts on LAPD services would be reduced to less than significant levels.

Emergency access to the Project site would continue to be provided from local public roadways. Roadways traversing and adjacent to the Project site would continue to provide public and emergency access. During events at the Civic Park and during the post-event period, traffic could result in considerable congestion at many area streets and intersections in the vicinity of the project site. This traffic congestion could potentially cause significant delays in LAPD emergency response times for responses within or through the Project site, thereby creating delays for other occupants and residents in the area. Mitigation measures have been developed to reduce this potentially significant impact to a less than significant level.

(2) Project with Additional Residential Development Option

The Project with Additional Residential Development Option provides for an additional 600 residential units in lieu of the 681,000 square feet of County office building space proposed by the Project. All other components of the Project with County Office Building Option are the same under the Project with Additional Residential Development Option.

(a) Construction

For the purpose of analysis, it is anticipated that while the design of the residential structures may be markedly different than that of the offices, overall the quantity of new construction (i.e., total square footage) would be substantially similar. As such, it is anticipated that the same amount and type of construction would occur and, subsequently, that similar short-term impacts would result. Such impacts, as in the case with the Project with County Office Building Option, would be less than significant, since emergency access would be maintained throughout construction and operation of the Project with Additional Residential Development Option. Further, the LAPD would be notified of construction and special events scheduling in order to plan appropriate alternative response routes and police coverage.

(b) Operation

Under the Project with Additional Residential Development Option, up to 600 residential units would be constructed in lieu of 681,000 square feet of County office building space. The Project with Additional Residential Development Option would be the same as the Project with County Office Building Option, except that it would provide up to 2,660 residential units, twenty percent of which (up to 532 units) would be affordable, and no County office building space. Under this scenario, the residential component would generate approximately 3,777 new residents; 852 more than the Project with County Office Building Option. However, the absence of the 681,000 square feet of County office building space associated with the proposed Project would reduce the Project's commercial population by roughly 2,724 to 1,835. Therefore, the total population for calculating impacts on police services under this option would total 5,612 as opposed to the population of 7,484 under the Project with County Office Building Option, and thus, impacts as a function of population would be less. Notwithstanding, an increased demand on police protection services is anticipated to occur with implementation of this development option.

The population growth attributed to the Project would reduce the existing police officer per resident ratio. With an additional site population of 5,612, the officer per resident ratio in the LAPD Central Area would be reduced to 1 officer per 146 residents. Since the Citywide officer/resident ratio is far less than this ratio, police coverage as a function of population in the Project area would remain greater. In accordance with statistical crime data for the LAPD Central Area, there would be approximately 864 additional crimes per year associated with the population generated by the Project with Additional Residential Development Option; 289 fewer than the Project with County Office Building Option. Thus, the average number of crimes committed annually in the LAPD Central Area would increase from roughly 6,744 to 7,608 as

compared to the 7,897 with the Project with County Office Building Option.¹⁵⁹ With the same number of officers as under existing conditions the ratio of crimes that are handled by each officer would fractionally decrease from the approximately 23.4 per officer anticipated in association with the Project with County Office Building Option to 22.6 per officer. As is the case with the Project with County Office Building Option, this level of increased demand when viewed in the context as occurring over the entire year is concluded to not constitute a substantial exceedance of LAPD's capacity and, thus, to result in a less than significant impact on the demand for LAPD services.

The demand for LAPD services relative to the Civic Park under the Project with Additional Residential Development Option would be the same as the Project with County Office Building Option, as no changes to the Civic Park would occur under the Project with Additional Residential Development Option. Thus, as is the case with the Project with County Office Building Option, impacts on LAPD services under the Project with Additional Residential Development Option would be less than significant.

4. CUMULATIVE IMPACTS

Of the 93 related projects identified in Section III.B of this Draft EIR, 61 of the related projects are located within the LAPD Central area. These projects would provide a total of 12,044 residential units and, based on an average household size of 1.63, would generate a total of 19,632 new residents.

They would also include approximately 2,605,000 square feet of retail space generating a population of 7,815; approximately 11,600,000 square feet of office space generating a population of 46,387; and approximately 2,550 hotel rooms generating a population of 3,825.¹⁶⁰ Thus, the total additional downtown population within the LAPD Central Area, inclusive of residential and non-residential populations, would be 77,657 persons.¹⁶¹

¹⁵⁹ *Crimes committed in the Central Area in 2004: 6,744 + Crimes anticipated in association with the Project with County Office Building Option: 1,153 = 7,897 + Increment anticipated in association with the Project with Additional Residential Development Option: 864 = 7,608.*

¹⁶⁰ *Based on the same factors from the City of Los Angeles CEQA Thresholds Guide that were used to calculate Project impacts: 4 persons per 1,000 sq.ft. of office space, 3 persons per 1,000 sq.ft. of retail space and 1.5 persons per hotel room.*

¹⁶¹ *As discussed above in the analysis of Project impacts, the use of the combined population is conservative and overstates the impacts on police services, since the LAPD evaluates service levels per residential population, and much of the non-residential population in the Central City area is double counted since they are also residents within the City.*

When combined with the population of the Project with County Office Building Option, 7,484 persons, the total cumulative growth would be 85,141 persons. When further combined with the existing population in the LAPD Central area of 43,748 the total population would be 128,889 persons. If the current 337 officers in the area were to remain constant at 337 officers, the ratio of population to officers would increase from 130 persons for each officer to 382 persons for each officer. If the per capita crime rate were to remain constant at 154 crimes per 1,000 population there would be 19,849 additional crimes and the crimes that would need to be handled by each officer would increase from 20 to 59. Under the Project with Additional Residential Development option, the total site population for purposes of calculating police impacts would be reduced from 7,484 to 5,612, and the total cumulative population would be reduced from 128,889 to 124,025 persons.

The cumulative 59 crimes that would be handled by each officer within the LAPD Central Area would be approximately three times greater than the 19 crimes that are handled by each officer that currently occurs Citywide, if additional officers were not added to the force. This level of increased demand is concluded to constitute a substantial exceedance of LAPD's capacity to provide services. Thus, cumulative impacts with regard to police protection services would be significant. However, if the City added resources in response to this growth, then cumulative impacts would be less than significant.

With regard to construction activities, no significant cumulative impacts associated with emergency access in and around the Project site would occur since the related projects are not located adjacent to or in close enough proximity to the Project site so as to cause a cumulative impact. Furthermore, the related projects are anticipated to maintain emergency access and to maintain secure sites during the respective construction periods, so that the construction of the related projects in the City of Los Angeles would not result in a demand on police services greater than the existing capability of the LAPD.

Although additional traffic generated by the Project and related projects could potentially cause delays in LAPD emergency response times, the ability to handle these circumstances are within the capabilities of the LAPD. As such, a less than significant cumulative impact with regard to emergency vehicle access would occur.

5. MITIGATION MEASURES

a. Construction

Regulatory Measures

Regulatory Measure I.2-1: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall provide clear and unobstructed LAPD access to the construction site. The LAPD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.2-2: During ongoing construction, Related, with regard to the five development parcels shall provide security features on the construction site(s), such as guards, fencing, and locked entrances. The LAPD shall determine compliance with this measure.

b. Operations

Regulatory Measure I.2-3: Prior to the start of each construction phase, Related, with regard to the five development parcels, shall submit plot plans for all proposed development to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented by Related to the extent feasible.

Regulatory Measure I.2-4: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plot plans for all proposed development to the County Office of Public Safety for review and comment. Security features subsequently recommended by the Office of Public Safety shall be implemented by the County or County Park Operator to the extent feasible.

Regulatory Measure I.2-5: At the completion of each construction phase, Related, with regard to the five development parcels shall file as-built building plans with the LAPD Central Area Commanding Officer. Plans shall include access routes, floor plans, and any additional information that might facilitate prompt and efficient police response. The LAPD shall determine compliance with this measure.

Regulatory Measure I.2-6: During Project operations, Related, with regard to the five development parcels and the responsible parties for implementation of the Civic Park shall install alarms and/or locked gates on doorways providing public access to commercial facilities. The LAPD shall determine compliance with this measure with regard to the five development parcels. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.2-7: During Project operations, Related, with regard to the five development parcels shall not plant landscaping in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users. The LAPD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. .

Regulatory Measure I.2-8: Additional lighting shall be installed where appropriate, including on the Project site and in parking garages, as determined in consultation with the LAPD with regard to the five development parcels and the County Office of Public Safety with regard to the Civic Park. Related shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement these measures prior to the completion of construction for each of those Project components.

Regulatory Measure I.2-9: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, a plan that incorporates safety features \ into the Project's design to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include the provision of security personnel; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the parking garages, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets. The LAPD shall determine compliance with this measure with regard to the five development parcels. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.2-10: Prior to the issuance of a certificate of occupancy for each construction phase and during Project operations, Related, with regard to the five development parcels, shall develop, and thereafter implement, a new or

modified Security Plan to minimize the potential for on-site crime and the need for LAPD services. The plan would outline the security services and features to be implemented, as determined in consultation with the LAPD. The LAPD shall determine compliance with this measure with regard to the five development parcels. The following shall be included in the plan:

- a. Provision of an on-site security force that would monitor and patrol the Project site. During operational hours, security officers shall perform pedestrian, vehicular, and/or bicycle patrols.
- b. Implementation of a video camera surveillance system and/or a closed-circuit television system;
- c. Additional security features shall be incorporated into the design of proposed parking facilities, including “spotters” for parking areas, and ensuring the availability of sufficient parking either on- or off-site for all building employees and anticipated patrons and visitors;
- d. Security lighting incorporating good illumination and minimum dead space in the design of entryways, seating areas, lobbies, elevators, service areas, and parking areas to eliminate areas of concealment. Security lighting shall incorporate full cutoff fixtures which minimize glare from the light source and provide light downward and inward to structures to maximize visibility;
- e. Provision of lockable doors at appropriate Project entryways, offices, retail stores, and restaurants;
- f. Installation of alarms at appropriate Project entryways and ancillary commercial structures;
- g. All businesses desiring to sell or allow consumption of alcoholic beverages are subject to the issuance of a Conditional Use Permit by the City;
- h. Accessibility for emergency service personnel and vehicles into each structure, and detailed diagram(s) of the Project site, including access routes, unit numbers, and any information that would facilitate police response shall be provided to the Central Area Commanding Officer.
- i. In addition, security procedures regarding initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance shall be outlined in the Security Plan. The plan would be subject to review by the LAPD, and any

provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.

Regulatory Measure I.2-11: Prior to the issuance of a certificate of occupancy for each construction phase and on-going during operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall develop, and thereafter implement, a Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by the LAPD with regard to the five development parcels and the County Office of Public Safety with regard to the Civic Park, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the recommended mitigation measures listed above, impacts to police protection services or response times would be less than significant. Cumulative impacts related to adequate police protection services remains significant and unavoidable.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
3. SCHOOLS

1. INTRODUCTION

This section evaluates potential impacts on the Los Angeles Unified School District (LAUSD) elementary, middle, and high school facilities that would serve the Project. The analysis is based on a forecast of the number of students generated by the Project, using LAUSD student generation factors, and focuses on whether LAUSD school facilities that serve the Project have would sufficient capacity to accommodate these students.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

Senate Bill 50 (SB 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of \$9.2 billion, including grants for new school construction and the modernization of existing schools. The New Construction Grant provides funding on a 50/50 State and local match basis. The Modernization Grant provides funding on a 60/40 basis. Districts that are unable to provide some or all of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.¹⁶⁰

SB 50 allows the LAUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD collects the maximum new school construction facility fee at a rate of \$3.60 per square foot of new residential construction, \$0.34 per square foot of new commercial construction and \$0.09 per square foot for parking structures. The payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant (see Government Code Section 65995).

¹⁶⁰ *State of California, Office of Public School Construction, School Facility Program Handbook, February 2005.*

b. Existing Conditions

The LAUSD encompasses roughly 704 square miles and serves the City of Los Angeles and all or portions of 28 other cities. The LAUSD is one of the largest public school districts in the nation, currently providing kindergarten through high school (K–12) education to a total of 718,238 students. The LAUSD is currently divided in eight Local Districts and operates 819 K-12 schools and centers including 419 elementary schools, 74 middle schools, and 50 senior high schools as well as numerous other educational facilities (i.e. magnet centers, continuation senior high schools, and special education).¹⁶¹ In addition, there are 61 independent charter schools and centers within the LAUSD’s jurisdiction.

The LAUSD has experienced an increase in enrollment over the last decade, from 636,000 students in the 1994–1995 school year to the expected 2005-2006 school year enrollment of over 737,000 students. In July 2004, David Taussig & Associates conducted a Residential Development Market Report (“Market Report”), for the LAUSD. The Market Report anticipates that over the next five years, an additional 13,217 students would be residing in 32,497 additional future residential units within the District’s boundaries.¹⁶²

The LAUSD makes a distinction between actual enrollment and eligible enrollment. Actual enrollment represents the number of students currently attending a school, whereas, eligible enrollment represents the number of students who are living within a school’s attendance boundaries and are eligible to attend that school. Eligible enrollment may be less than actual enrollment as the following options could allow students to enroll in schools away from their home attendance area:¹⁶³

- **Open Enrollment.** Open enrollment enables students anywhere within the district to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats;
- **Permits with Transportation (PWT).** The PWT program allows students to continue to go to the schools within the same feeder pattern¹⁶⁴ of the school they were enrolled in from elementary through high school. The LAUSD provides

¹⁶¹ *Los Angeles Unified School District, Office of Communications, Fingertip Facts 2004-2005*

¹⁶² *The LAUSD projected student enrollment was calculated using student generation rates established on the SGR Study conducted for the LAUSD by David Taussig & Associates, August 2004.*

¹⁶³ *Enrollment outside of a student’s home school of attendance is based on the availability of classroom seats at the desired school.*

¹⁶⁴ *A feeder pattern is the linkage from an elementary school to a middle school and a middle school to a high school.*

transportation to all students enrolled in the PWT program regardless of where they live within the District;

- **Employment-Related Transfer Permits.** Intra-district and inter-district parent employment-related transfer permits allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed;
- **Sibling Permits.** Sibling permits enable students to enroll in a school where a sibling is already enrolled; and
- **Child Care Permits.** Child care permits enable students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency or private organization or a verifiable child care provider.

The LAUSD has recently implemented a class size reduction program and as part of an effort to create the needed additional space, multi-track calendars are being utilized at many school sites. Currently, at least 30 percent of LAUSD schools are on multi-track year-round schedules to accommodate the heavy enrollment at overcrowded facilities.¹⁶⁵ According to the LAUSD, a school is considered to be overcrowded if any of the following conditions exist: (1) the school is currently on a multi-track calendar; (2) there is an expected seating shortage in the future; and/or (3) there is a seating overage of less than or equal to a safety margin of 30 seats in the future. Though the number of students eligible to attend a school is generally greater than actual enrollment, the LAUSD uses eligible enrollments to calculate seating overages and shortages.

A major goal of the LAUSD is to return all schools to a single-track calendar (two semesters). To help meet this goal, the LAUSD opened a total of 32 new schools for the 2005-2006 school year. These schools provide an additional 17,000 seats for K-12th grade students. The construction of these schools as well as the modernization and expansion of existing schools will serve to relieve overcrowding throughout the LAUSD. The proposed Project site is within LAUSD District 4. According to the LAUSD 2005 Strategic Execution Plan, an annual status report for the New School Construction Program, an estimated \$1.7 billion is budgeted to add 34,227 new two-semester seats to Local District 4.

¹⁶⁵ David Taussig and Associates, Inc., *Residential Development Market Report for Los Angeles School District*.

The following is a list of the existing schools that would potentially serve the Project, including location, distance from the Project area, eligible enrollment, and any seating shortages for the 2004–2005 school year.¹⁶⁶

1. Castelar Elementary School, located less than one mile to the northeast of the Project site at 840 Yale Street, provides educational services for kindergarten through fifth grades (K-5). The school operates on a single track and has an enrollment of 855 students.
2. Gratts Elementary School, located roughly one mile west of the Project at 309 Lucas Avenue, provides education services for kindergarten through fifth grades (K-5). The school operates on a three-track calendar and has an enrollment of 1,005 students.
3. Virgil Middle School, located approximately 3.5 miles from the Project site at 152 North Vermont Avenue, serves grades six through eight (6-8). The school operates on a three-track calendar, has an enrollment of 4,523 students, and a 1,704 seat shortage.
4. Belmont Senior High School, located roughly one mile from the Project site at 1575 West Second Street, provides educational services for 9th through 12th grade students. The school operates on a three-track calendar, has an enrollment of 6,764 students, and 1,849 seat shortage.

Table 76 on page 657 provides a summary of the existing enrollments and capacities of the schools that serve the project site. Currently, Castelar and Gratts Elementary Schools have available capacity of 43 and 41 seats, respectively. However, as Gratts Elementary School is operating on a three-track calendar it is considered to be overcrowded as per LAUSD standards. According to the number of students eligible for enrollment, Virgil Middle School and Belmont High School are operating with seating shortages of 1,704 and 1,849, respectively. However, if the actual number of students enrolled at these schools were compared to the current capacity, both schools would be operating with available capacity.¹⁶⁷ Notwithstanding, these schools are on a multi-track calendar, and thus, are considered to be overcrowded. The locations of the schools that currently serve the Project site are shown in Figure 49 on page 658.

¹⁶⁶ LAUSD School Information Branch, Planning, Assessment and Research Division, School Profiles, website, www.lausd.k12.ca.us/lausd/offices/icb/, accessed June 5, 2006.

¹⁶⁷ Current capacity (2,819) minus actual enrollment (2,803) at Virgil Middle School = 16, Current capacity (4,915) minus actual enrollment (4,799) at Belmont High School = 116

Table 76

Existing School Capacities

School	Calendar	Current Capacity	Eligible Enrollment	Actual Enrollment	Current Seating overage/(Shortage)	Overcrowding Now?
Castelar Elementary	1 Track	898	855	841	43	No
Gratts Elementary	3 Tracks	1046	1005	959	41	Yes
Virgil Middle	3 Tracks	2819	4523	2803	-1704	Yes
Belmont Senior High	3 Tracks	4915	6764	4799	-1849	Yes

^a Current capacity provided by the LAUSD for the 2004-2005 school year.

Source: NOP response letter from LAUSD, OEHS to The Grand Avenue Authority, October 10, 2005.

3. ENVIRONMENTAL IMPACTS

a. Methodology

As implementation of the streetscape program and the creation of the Civic Park would not generate students, the focus of this analysis is on development associated with the five development parcels. The analysis of potential Project impacts on school facilities is based on the type and amount of proposed construction occurring within the attendance boundaries of each school. In calculating student generation by the proposed Project it is assumed that all of the students associated with the residential component of the Project are located within the attendance boundaries of Castelar and Gratts Elementary Schools, Virgil Middle School, and Belmont High School. However, students generated by the commercial component and within the attendance boundaries of the four serving schools, as stated above, would be limited to those employees who reside within certain driving distances from their homes to their jobs. Project employees who travel less than five minutes to work are assumed to generate students within the attendance boundaries of Castelar and Gratts Elementary Schools, Project employees who travel less than 10 minutes to work are assumed to generate students within the attendance boundaries of Virgil Middle School, and Project employees who travel less than 15 minutes to work are assumed to generate students within the attendance boundaries of Belmont Senior High School.

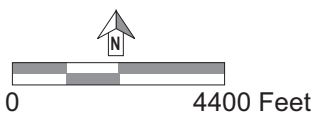
Though, parent employment-related transfer permits could allow students to enroll in a school that serves the attendance area where a student's parent is regularly employed, it is anticipated that the majority of students living outside of these drive-time parameters would attend schools located closer to their places of residence versus their parents places of employment.



LEGEND

- 1) Gratts Elementary School, 309 Lucas Ave, Los Angeles, CA
- 2) Belmont High School, 1575 W 2nd St, Los Angeles, CA
- 3) Castelar Elementary School, 840 Yale St, Los Angeles, CA
- 4) Virgil Middle School, 152 N Vermont Ave, Los Angeles, CA

 Project Site



Source: PCR Services Corporation, 2006.

Figure 49
School Location Map

The LAUSD student generation factors presented in this document as well as school enrollment and capacity data were obtained directly from the LAUSD. The number of students generated by the proposed Project was compared to projected capacities at the relevant LAUSD schools in order to identify the extent to which Project-generated students could be accommodated within these facilities. The number of students generated from the proposed Project was also compared to estimated capacities at planned LAUSD facilities in order to identify the extent to which Project-generated students could be accommodated within these facilities. The following methodology was used to determine potential Project impacts:

1. The number of students generated by the Project is calculated using LAUSD Generation Factors.
2. The number of Project-generated students is compared to the future capacity at each school that serves the Project area.
3. The number of Project-generated students is compared to the capacity of planned facilities that would serve the Project area.
4. A determination of the adequacy of facilities to accommodate the students generated by the proposed Project is made.

LAUSD's current enrollment forecasts are based on the 2004-2005 school year. The LAUSD limits its enrollment forecasts to five-year projections. Although Project buildout is anticipated to occur in 2015, future school capacity determinations are made based on LAUSD's five-year projections, as this constitutes the best available information.

b. Thresholds of Significance

Based on the factors set forth in the City of Los Angeles CEQA Thresholds Guide (1998), the proposed Project would have a significant impact on LAUSD schools if:

- The demand for school services anticipated at the time of project build out exceeds the expected level of service available; or
- The increased demand would require the construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (i.e., multi-track calendar), or other actions that would create a temporary or permanent impact on the school(s) serving the Project site.

c. Impact Analysis**(1) Project with County Office Building Option****(a) Construction**

Construction vehicles are anticipated to access the Project site primarily from the 110 Freeway at Third Street, although some construction traffic may access the Project site from the 101 Freeway to the north. As Castelar Elementary School is located to the north of the 101 Freeway and construction traffic would be traveling south off the freeway, haul routes would not pass nearby or in front of the school. Virgil Middle School is located approximately three miles north of the 110/101 freeway interchange. As the Project is located south of the freeway interchange, construction traffic would not exit nearby or in front of the school. Accordingly, pedestrian and bus routes would not be significantly impacted by construction-related traffic at either of these schools.

As stated above, construction-related traffic would exit the 110 Freeway at Third Street and travel southeast to the Project area. Thus, as Gratts Elementary School and Belmont Senior High School are located northwest of the 110 Freeway and the Project site, haul routes would not interfere with school bus or pedestrian routes. Since construction-related traffic would not interfere with school bus routes, school bus access and on-time performance would not be impeded. Therefore, due to the location of the identified schools in relationship to the Project, haul routes would not interfere with school bus or pedestrian routes during Project construction.

Due to the Project's location relative to the locations of the identified schools, construction staging and construction vehicle parking would not occur on or near school property. Safety and security would be maintained throughout construction of the Project, as construction activities would adhere to all applicable standard construction standards including the California Vehicle Code.

(b) Student Generation

The Project with County Office Building Option would introduce up to 2,060 residential units within the attendance boundaries of the identified schools including up to 1,648 condominium units and 412 multi-family units. The LAUSD has developed student generation factors for a variety of housing types, such as, single family detached units, single family attached units (i.e. condominiums), and multi-family units. Single family attached unit and multi-family unit student generation factors were utilized to estimate student generation for the residential component of the Project, as they are reflective of the type of development proposed. The student generation rates for single-family attached units, which includes condominiums, are

as follows: (1) 0.0867 elementary school student per dwelling unit; (2) 0.0434 middle school student per dwelling unit; and (3) 0.0438 high school student per dwelling unit. The student generation factors for multi-family units are: (1) 0.2396 elementary school student per dwelling unit; (2) 0.1070 middle school student per dwelling unit; and (3) 0.0933 senior high student per dwelling unit. As shown in Table 77 on page 662 based on LAUSD student generation factors, an estimated total of 468 students would be generated by the residential component of the proposed Project, consisting of 242 elementary school students, 116 middle school students, and 110 high school students.

The Project with County Office Building Option would also introduce up to 449,000 square feet of retail/commercial development (as well as 10,000 square feet of restaurant space within the Civic Park), 681,000 square feet of County office building uses, and up to 275 hotel rooms (with 15,000 square feet of hotel meeting space) into the attendance boundaries of the identified schools. As shown in Table 2, approximately 861 students would be generated by the commercial component of the Project with County Office Building Option, consisting of 425 elementary school students, 196 middle school students, and 240 high school students.

As stated in the Methodology section above, the number of students generated from the retail/commercial component would correspond to the driving distances of the employees to their jobs. According to Census 2000 data, approximately two percent of all workers in the Project area travel less than five minutes to work, 13 percent travel less than 10 minutes to work, and 25 percent travel less than 15 minutes to work.¹⁶⁸ It is anticipated that travel time to work for the employees generated by the Project would be similar to that of other workers living in the Project area. The Project would generate approximately 3,930 employees. Accordingly, 79 employees would constitute two percent, 511 would constitute 13 percent, and 983 would constitute 25 percent of the total.

Based on the number of employees living within the attendance boundaries of the schools that would serve the Project and the LAUSD student generation rates, employees of the commercial component of the Project with County Office Building Option would generate 92 students: eight students within the attendance boundaries of Castelar and Gratts Elementary Schools, 25 students within the attendance boundaries of Virgil Middle School, and 59 students within the attendance boundaries of Belmont High School. Therefore the residential and commercial components of the Project with County Office Building Option would collectively generate a total of 560 students that would attend the identified schools, consisting of 250 elementary school students, 141 middle school students, and 169 high school students. As previously stated, two separate elementary schools would serve the Project. As the Project is located in an area where students may attend either school and each school is located roughly

¹⁶⁸ *Census 2000, Table P31. Travel Time to Work for Workers 16 Years and Over, Census Tract 2075.*

Table 77

Estimated Student Generation for the Project with County Office Building Option

A. Residential Component*Condominium Units*

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.0867	1,648	143
Middle	0.0434	1,648	72
High	0.0438	1,648	<u>72</u>
Total Students (Single-Family Attached)			287

Multi-Family Units

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.2396	412	99
Middle	0.107	412	44
High	0.0933	412	<u>38</u>
Total Students (Multi-Family)			181

	Elementary	Middle	High	Total
Residential Component Student Generation	242	116	110	468

B. Commercial Component

School Level	Student Generation Rates ^c	Total Number of Employees	Forecasted Student Generation ^b
Elementary	0.106	3,930	417
Middle	0.049	3,930	193
High	0.060	3,930	<u>236</u>
Total Students (Commercial Component)			846

School Level	Student Generation Rates ^c	Number of Employees within Attendance Boundaries	Forecasted Student Generation ^b
Elementary	0.106	79 ^d	8
Middle	0.049	511 ^e	25
High	0.060	983 ^f	<u>59</u>
Total Students within Attendance Boundaries (Commercial Component)			92

C. Combined Total from Residential and Commercial

	Elementary	Middle	High	Total
Total Students Generated (Residential and Commercial Components)	659	309	346	1,314
Total Students Generated (Residential and Commercial: Within Attendance Boundaries)	250	141	169	560

Table 77 (Continued)**Estimated Student Generation for the Project**

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- ^a LAUSD Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004.
- ^b Number of Students rounded to the nearest whole number.
- ^c Based on rates generated by LAUSD.
- ^d It is assumed that elementary students would reside within an approximately five-minute drive of their home. According to Census 2000 data, approximately two percent of all workers travel less than five minutes to work. Thus, it is assumed that two percent of the employees live within the elementary attendance boundaries.
- ^e It is assumed that middle school students would reside within an approximately 10-minute drive of their home. According to Census 2000 data, approximately 13 percent of all workers travel approximately 10 minutes to work. Thus, it is assumed that 13 percent of the employees live within the middle school attendance boundaries.
- ^f It is assumed that high school students would reside within an approximately 15-minute drive of their home. According to Census 2000 data, approximately 25 percent of all workers travel approximately 15 minutes to work. Thus, it is assumed that 25 percent of the employees live within the high school attendance boundaries.

Source: PCR Services Corporation.

one mile from the Project area, it is anticipated that approximately half of the students (125 students) would attend Castelar Elementary School and half would attend Gratts Elementary School.

(c) Project Impacts on LAUSD Facilities

(i) Existing Facilities

The following discussion analyzes the impact on the ability of existing school facilities at Castelar Elementary School, Gratts Elementary School, Virgil Middle School, and Belmont High School, as well as planned future school facilities, to accommodate the anticipated students generated by the Project with County Office Building Option and the Project with Additional Residential Development Option. Although Project buildout is anticipated to occur in 2015, future school capacity determinations are made based on LAUSD's five-year projections (Year 2010) as this constitutes the best available information.

The 560 students generated by the Project with County Office Building Option, consisting of 250 elementary school students, 141 middle school students, and 169 high school students, would contribute to the projected seating shortage or overcrowding at all four of the identified serving schools. As shown in Table 78 on page 665, based on LAUSD projected enrollment figures, implementation of this Option would contribute to the following seating shortages: 257 seats at Castelar Elementary School, 310 seats at Gratts Elementary School, 2,398 seats at Virgil Middle School, and 5,080 seats at Belmont High School. As a result, impacts of

the Project with County Office Building Option on existing LAUSD facilities serving the Project site would be significant.

(ii) Future Facilities

As concluded above, all four schools that would serve the Project are projected to be overcrowded in the future with or without the Project. However, the issue of overcrowding is being addressed through the construction of nine new schools in the Project area.¹⁶⁹ Overcrowding at Gratts Elementary will be addressed through the new Gratts Primary Center, which will provide approximately 400 seats for students in grades K-2. Virgil Middle School will be relieved through the construction of two new middle schools and the reconfiguration of Belmont Senior High School, which will provide a total of approximately 4,482 seats.¹⁷⁰ Additionally, the construction of four new high schools and a new learning center will provide a total of approximately 11,260 seats to provide relief to the current overcrowding conditions at Belmont Senior High School.¹⁷¹ All of the above-mentioned facilities will be open by 2009. Funding for these schools is provided through the New School Construction Program. The new schools would be funded by sources that include, but are not limited to: Bond BB, Measure K, Measure R, Prop. 1A, Prop.47, and Developer Fees.

Therefore, although the students generated under the Project would contribute to the projected seating shortage and overcrowding at the four schools currently serving the Project site, it is anticipated that the Project's middle and high school students would be dispersed throughout the attendance boundaries of both the existing and the newly constructed schools as Project build-out would occur after the new schools are open for student occupancy. Thus, as students could be accommodated at the schools planned as part of the New School Construction Program, impacts on LAUSD middle and high schools attributable to the Project would be less than significant. Notwithstanding, significant impacts would continue to occur at Castelar and Gratts Elementary Schools as, despite the construction of the new Gratts Primary School, Project-generated students could not be accommodated within the existing or future capacities of these schools.

As stated above, students generated by the Project with County Office Building Option would contribute to seating shortages and overcrowding at all four schools identified to serve the Project. Thus, the construction of new facilities, a major reorganization of students or

¹⁶⁹ Los Angeles Unified School District, OEHS, letter in response to NOP from Glenn Striegler, October 10, 2005.

¹⁷⁰ Central Los Angeles Middle Schools 1 (1,703 seats) and 3 (810 seats). Belmont Senior High School reconfiguration (

¹⁷¹ Central Los Angeles High Schools numbers 9 through 12 (total seats = 7,020 seats). Central LA New Learning Center(4,240 seats).

Table 78

**Impact on Existing LAUSD School Facilities
Project with County Office Building Option**

School	Projected Capacity	Projected Enrollment	Projected Seating Shortage Without Project	Project-Generated Students	Project + Projected	Seating Shortage with Project and Projected Development
Castelar Elementary	687	819	132	125	944	257
Gratts Elementary	627	812	185	125	937	310
Virgil Middle	1,950	4,207	2,257	141	4,348	2,398
Belmont Senior High	3,042	7,953	4,911	169	8,122	5,080

Source: NOP response letter from LAUSD, OEHS to The Grand Avenue Authority, October 10, 2005 and PCR Services Corporation.

classrooms, or changes to school calendars may be required. However, payment of the requisite school facility development fees would offset the potential impacts attributable to the Project at all four of the identified schools. As a result, Project development would result in a less than significant impact to the LAUSD schools that would serve the Project site.

(2) Project with Additional Residential Development Option

(a) Construction

The Project with Additional Residential Development Option would consist of 600 residential units that would be developed in place of the 681,000 square feet of County office building space proposed by the Project with County Office Building Option. Construction of the optional 600 additional residential units would take place on Parcel W1/W2 where the County office building proposed by the Project with County Office Building Option is planned to be located. Therefore, as with the Project with County Office Building Option, haul routes under the Project with Additional Residential Development Option would not interfere with school bus or pedestrian routes during Project construction and a less than significant impact would result.

(b) Student Generation

The Project with Additional Residential Development Option would introduce 600 additional residential units compared to the Project with County Office Building Option. This amount of additional residential development consists of up to 480 condominium units and 120

multi-family units. As shown in Table 79 on page 667, under this development scenario, the residential component of the Project would consist of 2,660 units and generate a total of 603 students: 311 elementary school students, 149 middle school students, and 143 high school students. Therefore, the residential component of the Project with Additional Residential Development Option would generate 135 more students than would the Project with County Office Building Option.

The Project with Additional Residential Development Option would also include the removal of the 681,000 square feet of County office building space proposed by the Project. Thus, whereas, approximately 861 students would be generated by the commercial component of the Project with County Office Building Option, 302 students would be generated by the commercial component of the Project with Additional Residential Development Option. However, based on the number of employees living within the attendance boundaries of the schools that would serve the Project and the LAUSD student generation rates, employees under the Project with Additional Residential Development Option would generate 33 students: three students within the attendance boundaries of Castelar and Gratts Elementary Schools, nine students within the attendance boundaries of Virgil Middle School, and 21 students within the attendance boundaries of Belmont High School.

Overall, under the Project with Additional Residential Development Option, the residential and commercial components would generate a total of 632 students that would attend the identified schools, consisting of 314 elementary school students, 157 middle school students, and 161 high school students. As previously discussed, the Project with County Office Building Option would generate 560 students, 72 fewer than the Project with Additional Residential Development Option.

(c) Project Impacts on LAUSD Facilities

(i) Existing Facilities

The Project with Additional Residential Development Option would generate a total of 632 students, consisting of 314 elementary school students, 157 middle school students, and 161 high school students. As with the Project with County Office Building Option, this option would contribute to the projected seating shortage or overcrowding at all four of the identified serving schools. Based on LAUSD projected enrollment figures, implementation of the Project with Additional Residential Development Option, as shown in Table 80 on page 669, would contribute to the following seating shortages: 289 seats at Castelar Elementary School, 342 seats at Gratts Elementary School, 2,415 seats at Virgil Middle School, and 5,075 seats at Belmont High School. As a result, the impacts of the Project with Additional Residential Development Option on existing LAUSD facilities serving the Project site would be significant.

Table 79

Estimated Student Generation for the Project with Additional Residential Development Option

A. Residential Component*Condominium Units*

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.0867	2,128	184
Middle	0.0434	2,128	92
High	0.0438	2,128	<u>93</u>
Total Students (Single-Family Attached)			369

Multi-Family Units

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.2396	532	127
Middle	0.107	532	57
High	0.0933	532	<u>50</u>
Total Students (Multi-Family)			234

	Elementary	Middle	High	Total
Residential Component Student Generation	311	149	143	603

B. Commercial Component

School Level	Student Generation Rates ^c	Total Number of Employees	Forecasted Student Generation ^b
Elementary	0.106	1,206	128
Middle	0.049	1,206	59
High	0.060	1,206	<u>72</u>
Total Students (Commercial Component)			259

School Level	Student Generation Rates ^c	Number of Employees within Attendance Boundaries	Forecasted Student Generation ^b
Elementary	0.106	24 ^d	3
Middle	0.049	157 ^e	8
High	0.060	302 ^f	<u>18</u>
Total Students within Attendance Boundaries (Commercial Component)			29

C. Combined Total from Residential and Commercial

	Elementary	Middle	High	Total
Total Students Generated (Residential and Commercial Components)	439	208	215	862
Total Students Generated (Residential and Commercial: Within Attendance Boundaries)	314	157	161	632

Table 79 (Continued)**Estimated Student Generation for the Additional Residential Development Option**

^a LAUSD Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004

^b Number of Students rounded to the nearest whole number.

^c Based on rates generated by LAUSD.

^d It is assumed that elementary students would reside within an approximately five-minute drive of their home. According to Census 2000 data, approximately two percent of all workers travel less than five minutes to work. Thus, it is assumed that two percent of the employees live within the elementary attendance boundaries.

^e It is assumed that middle school students would reside within an approximately 10-minute drive of their home. According to Census 2000 data, approximately 13 percent of all workers travel approximately 10 minutes to work. Thus, it is assumed that 13 percent of the employees live within the middle school attendance boundaries.

^f It is assumed that high school students would reside within an approximately 15-minute drive of their home. According to Census 2000 data, approximately 25 percent of all workers travel approximately 15 minutes to work. Thus, it is assumed that 25 percent of the employees live within the high school attendance boundaries.

Source: PCR Services Corporation.

(ii) Future Facilities

As with the Project with County Office Building Option, students could be accommodated at the middle and high schools planned as part of the New School Construction Program and associated impacts attributable to the Project with Additional Residential Development Option would be less than significant. However, significant impacts would occur at Castelar and Gratts Elementary Schools as, despite the construction of the new Gratts Primary School, students generated under the Project with Additional Residential Development Option could not be accommodated within the existing or future capacities at these schools. Further, as more students would be generated with implementation of the Project with Additional Residential Development Option when compared to the Project with County Office Building Option, impacts to the LAUSD schools identified to serve the Project site would be greater. However, similar to the Project with County Office Building Option, payment of the requisite school facility development fees would offset the potential impacts attributable to the Project with Additional Residential Development Option at all four of the identified schools. As a result, development of the Project with Additional Residential Development Option would result in an impact that is less than significant to the LAUSD schools that would serve the Project site.

4. CUMULATIVE IMPACTS

Section III.B of this Draft EIR provides a list of related projects that have the potential to occur concurrent with the development of the Project. As the Project would not impact schools within other attendance boundaries, cumulative impacts related to schools are analyzed only for

Table 80

**Impact on Existing LAUSD School Facilities
Project with Additional Residential Development Option**

School	Projected Capacity	Projected Enrollment	Projected Seating Shortage Without Project	Project-Generated Students	Project + Projected Enrollment	Seating Shortage With Project and Projected Development
Castelar Elementary	687	819	-132	157	976	-289
Gratts Elementary	627	812	-185	157	969	-342
Virgil Middle	1,950	4,207	-2,257	157	4,365	-2,414
Belmont Senior High	3,042	7,953	-4,911	161	8,117	-5,072

Source: NOP response letter from LAUSD, OEHS to The Grand Avenue Authority, October 10, 2005 and PCR Services Corporation.

projects within the same attendance boundaries as the schools identified to serve the Project: Castelar Elementary School, Gratts Elementary School, Virgil Middle School and, Belmont Senior High School. Cumulative impacts were assessed utilizing the LAUSD student generation factors for non-specified housing types, as information regarding the specific dwelling unit mix of individual projects is not available.

Eleven related projects (Nos. 13, 14, 16-19, 55, 63, 71, 76 and 89) have been identified within the attendance boundaries of Gratts Elementary School. Related Project Nos. 18, 63 and 71 include the development of Central High School No. 10, Central High School No. 12, and the expansion of Gratts Primary Center, respectively. The remaining projects include the development of 1,415 dwelling units and 880,000 square feet of office uses. Based upon the generation rates presented in Tables 77 and 79 on pages 662 and 667, the 1,415 dwelling units, comprised of 870 single-family units and 545 multi-family units, are anticipated to generate approximately 206 students. The office uses within the identified related projects are anticipated to generate approximately 373 students of which seven would be within the local attendance boundary. Thus, the total number of students generated by the related-projects within the current attendance boundaries of Gratts Elementary School is approximately 213 students. These students in addition to the students generated by the Project with County Office Building Option (125 students) total 338 students. These students in addition to the students generated by the Project with Additional Residential Development Option-related (157 students) total 370 students.

Seven related projects (Nos. 12, 22, 23, 35, 56, 77 and 88) are within the attendance boundaries of Castelar Elementary School. Related Projects No. 12 and 22 include the development of Central High School No. 11 and Central High School No. 9, respectively. The remaining projects include the development of 1,576 multi-family dwelling units, 4,200 square feet of retail use, 17,000 square feet of supermarket uses, and 30 additional employees at the Hall of Justice (No. 56). The 1,576 dwelling units are anticipated to generate approximately 378 students. The retail, supermarket and increased employees at the Hall of Justice are anticipated to generate approximately one, five, and three students, respectively, of which less than one would be within the local attendance boundary. Thus, the total number of students generated by the related projects that are within the current attendance boundaries of Castelar Elementary School is approximately 379 students. These students in addition to the students generated by the Project with County Office Building Option (125 students) total 504 students. These students in addition to the students generated by the Project with Additional Residential Development Option-related (157 students) total 536 students.

Eleven related projects (Nos. 13, 14, 16, 18, 19, 63, 71, 75, 76, 89, 90) have been identified within the attendance boundaries of Virgil Middle School. As stated above, Related Project Nos. 18, 63, and 71 are future school sites. The remaining projects include the development of 870 single-family dwelling units, 465 multi-family dwelling units and approximately 54,000 square feet of medical/office uses. The dwelling units would generate approximately 88 students, while the medical/office uses would generate approximately 11 students, of which one would be within the local attendance boundary. Thus, the total number of students generated by the related projects that are within the current attendance boundaries of Virgil Middle School is approximately 89 students. These students in addition to the students generated by the Project with County Office Building Option (141 students) total 230 students. These students in addition to the students generated by the Project with Additional Residential Development Option-related (157 students) total 246 students.

Eighty-eight of the 93 related projects are within the attendance boundaries of Belmont High School. Only Related Projects No. 44, 48, 52, 54, 74 and 81 are not located within the attendance boundaries of Belmont High School. The 88 related-projects include approximately 8,900 single-family dwelling units and approximately 7,700 multi-family dwelling units. These residential uses would generate approximately 1,104 students. The total estimate of cumulative employees for all 93 related projects is approximately 62,370. As the five related-projects outside of the attendance boundaries would consist of approximately 1,229 employees, the 88 related-projects within the attendance boundaries would consist of approximately 61,141 employees. These employees would generate approximately 3,668 students, of which 917 would be located within the local attendance boundary. Thus, the total number of students with the attendance boundaries of Belmont High School for the related projects would be approximately 4,772. These students in addition to the students generated by the Project with County Office Building Option (169 students) total 2,021 students. These students in addition to

the generated by the Project with Additional Residential Development Option (161 students) total 2,182 students.

The generation of students from related projects in combination with students generated by the Project with County Office Building Option or the Project with Additional Residential Development Option would contribute to overcrowding to all of the aforementioned LAUSD schools, as existing school capacities would be exceeded, a significant cumulative impact would occur. However, as discussed above, future school facilities are currently planned that would help alleviate projected seating shortages at the impacted schools. With the addition of the related-projects students to the Project students under both Options, it is anticipated that middle and high school students would be dispersed throughout the attendance boundaries of both the existing and the newly constructed schools as Project build-out would occur after the new schools are open for student occupancy. Thus, cumulative impacts on LAUSD middle and high schools attributable to the Project with County Office Building Option or the Project with Additional Residential Development Option would be less than significant. However, the students generated by the related projects in combination with both Project Options could not be accommodated within the existing or future capacities at Gratts or Castelar Elementary Schools. As a result, a significant impact would occur. This impact would be reduced to a less than significant level as each related project would pay new school facility development fees, and, under the provisions of SB 50, the payment of these fees constitutes full mitigation of the impacts of these new developments

5. MITIGATION MEASURES

Based on the preceding analysis, the students generated by the Project could not be accommodated within the existing facilities at the identified schools. The additional elementary students generated by the Project would result in a potentially significant impact at Castelar Elementary School as neither expansion of the existing facilities nor the construction of new elementary schools in the school's attendance area is currently planned. Despite the planned construction of the new Gratts Primary Center, students generated by the Project would also result in a potentially significant to Gratts Elementary School. With regard to Virgil Middle School and Belmont Senior High School, the construction of additional facilities planned to relieve overcrowding would provide enough seats to sufficiently accommodate Project-generated middle and high school students, and thus, Project impacts would be less than significant. Notwithstanding, the Related Companies would be required to pay new school facility development fees at the time of building permit issuance. Pursuant to California Government Code Section 65995, payment of the developer fees required by State law provides full and complete mitigation of the impacts of the Project as well as the Additional Residential Development Option on school facilities, thereby reducing impacts to a less than significant

level. Through compliance with Government Code Section 65995, impacts on schools would be less than significant, and no other mitigation measures are required.

Mitigation Measure

Mitigation Measure I.3-1: Prior to the issuance of each building permit, Related, with regard to the five development parcels, shall pay school mitigation fees pursuant to the provisions of California Government Code Section 65995. Compliance with this measure shall be determined by the City's Department of Building and Safety, or other appropriate City agency or department.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Pursuant to the provisions of Government Code Section 65995, a project's impact on school facilities is fully mitigated through the payment of the requisite school facility development fees current at the time building permits are issued. As the Project applicant is required to pay school facility development fees, impacts under the Project with County Office Building Option or the Project with Additional Residential Development Option are concluded to be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
4. PARKS AND RECREATION

1. INTRODUCTION

This section analyzes the potential impacts of the proposed Project with regard to the parks and recreational facilities that would serve the Project's future residents. The analysis evaluates the Project's provisions for park and open space area compared to applicable goals and regulatory requirements. The City of Los Angeles Department of Recreation and Parks would be the principal provider of public recreational facilities to the proposed Project's residents. The facilities included in this analysis are the neighborhood, community, and regional parks that are within a 2-mile radius of the proposed Project site.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State Level

The California Government Code, Section 66477 (Quimby Act) was enacted in an effort to promote the availability of park and open space areas in response to the need for such facilities by residential development. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land and/or the payment of fees for park and/or recreational facilities for projects involving residential subdivisions. The Quimby Act provides that the dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area already exceeds that limit. As this standard is not exceeded in the Project area, the maximum exaction under the Quimby Act is 3 acres of park area per 1,000 persons.

(2) Regional Level

SCAG prepared the Regional Comprehensive Plan and Guide (RCPG) in conjunction with its constituent members and other regional planning agencies. The RCPG is intended to serve as a framework to guide decision-making with respect to the growth and changes that can be anticipated by the year 2015 and beyond. The RCPG provides a general view of various

regional plans. At the regional level, the goals, objectives and policies in the RCPG are relevant yardsticks for measuring consistency with adopted plans. However, the authority and responsibility for land use and other critical planning decisions rest with individual city and county governments. Accordingly, the RCPG proposes a strategy for local governments to use, voluntarily, to address issues related to future growth and to provide a means for assessing the potential impact of Projects within the context of the region.

The Open Space and Conservation Chapter of the RCPG is non-mandated and is intended for information and advisory purposes. Thus, the goals and objectives in this Chapter are not legal mandates with which local governments must comply. The purpose then is to guide local governments in planning for the provision of regional open space. The following goals pertaining to outdoor recreation have been identified by SCAG as being relevant to the proposed Project:

- Increase the accessibility to open space lands for outdoor recreation; and
- Promote self-sustaining regional recreation resources and facilities.

(3) Local Level

City of Los Angeles General Plan

The City of Los Angeles' General Plan indicates that a park and recreation system should address standards in three respects: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

The Project site is located within the City of Los Angeles' Central City Community Plan area. The Central City Community Plan (Community Plan) is organized according to neighborhoods and districts, one of which is Bunker Hill, wherein the Project is located. Several objectives, policies, and programs pertaining to open space and recreation are set forth in the Community Plan. The Central City Community Plan Area lists Pershing Square, Sixth and Gladys Street Park, City Hall South Lawn Park, Grand Hope Park, Maguire Gardens at the Central Library, and the Evergreen Recreation Center as open space and recreational resources. The existing Civic Mall, located in the Central City Community Plan area, is designated as an open space land use. The Community Plan also designates Civic Mall as "Civic Center," which allows government activities on publicly owned land, or activities related to the government complex, such as office space, retail uses, restaurants, or joint public/private enterprises, such as parking lots.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities. In addition to the standards established in the PRP, park and open space requirements are also set forth in Sections 12.21 and 17.12 of the City of Los Angeles Municipal Code (LAMC). The following provides information regarding both the PRP and applicable LAMC standards and requirements.

Public Recreation Plan (PRP)

The PRP was adopted in 1980 by the Los Angeles City Council.¹⁷² The PRP focuses on physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts. To a large extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radii and projected population levels.

Based on the standard park characteristics identified in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks include both neighborhood and community recreational sites and open space. The PRP also includes "small" parks in this category. A small park is usually less than 1 acre in size. A neighborhood recreation site is intended to serve its immediate neighborhood. It should provide space and facilities for outdoor and indoor recreation activities to meet the needs of the residents of all ages within the particular neighborhood it serves. Neighborhood parks typically include a recreation building, a multipurpose field, a hard court area, play apparatus, a picnic area, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be 10 acres, within the City of Los Angeles, they are usually 1 to 5 acres in size. A community recreation site is designed to serve residents of all ages in several surrounding neighborhoods. It provides facilities to serve a wider range of interests, including a community building, multi-purpose fields, hard court areas, parking, maintenance service areas, and play areas. It may also include baseball diamonds, football and soccer fields, tennis and handball courts and a swimming pool. The ideal size for a community recreation site is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for neighborhood and community park and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The desired long-range (minimum) standard for local parks is based on 2 acres per 1,000 persons for neighborhood parks with a service radius

¹⁷² *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.*

of 0.5 mile, and 2 acres per 1,000 persons for community parks with a service radius of 2 miles. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of 1 acre per 1,000 persons within a 1 mile service radius for neighborhood parks and 1 acre per 1,000 persons within a 3-mile service radius for community parks. Finally, the PRP establishes that no park or recreational facility should be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or unless the need is diminished due to population and/or land use changes.

City of Los Angeles Zoning Municipal Code (LAMC)

Section 12.21 of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms.

This section of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is an area that is contiguous to and immediately accessible from an individual dwelling unit. In developments built at an R5 density, such as the proposed Project, private open space may be provided above the first habitable room level. When so provided, it must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

In addition, Section 17.12 of the LAMC, as authorized under the State Quimby Act, provides standards for parkland acreage requirements by project density and identifies fees per unit by zoning designation. The area of land within a project required to be dedicated for park and recreation purposes is based upon the maximum density permitted within the zone where it is located.

Section 17.12 of the LAMC also permits recreational areas within a Project site that are developed for use by the project's residents to be credited against the Project's land dedication requirement. Recreational areas that qualify under this provision of LAMC Section 17.12

include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those in City parks. In addition, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.

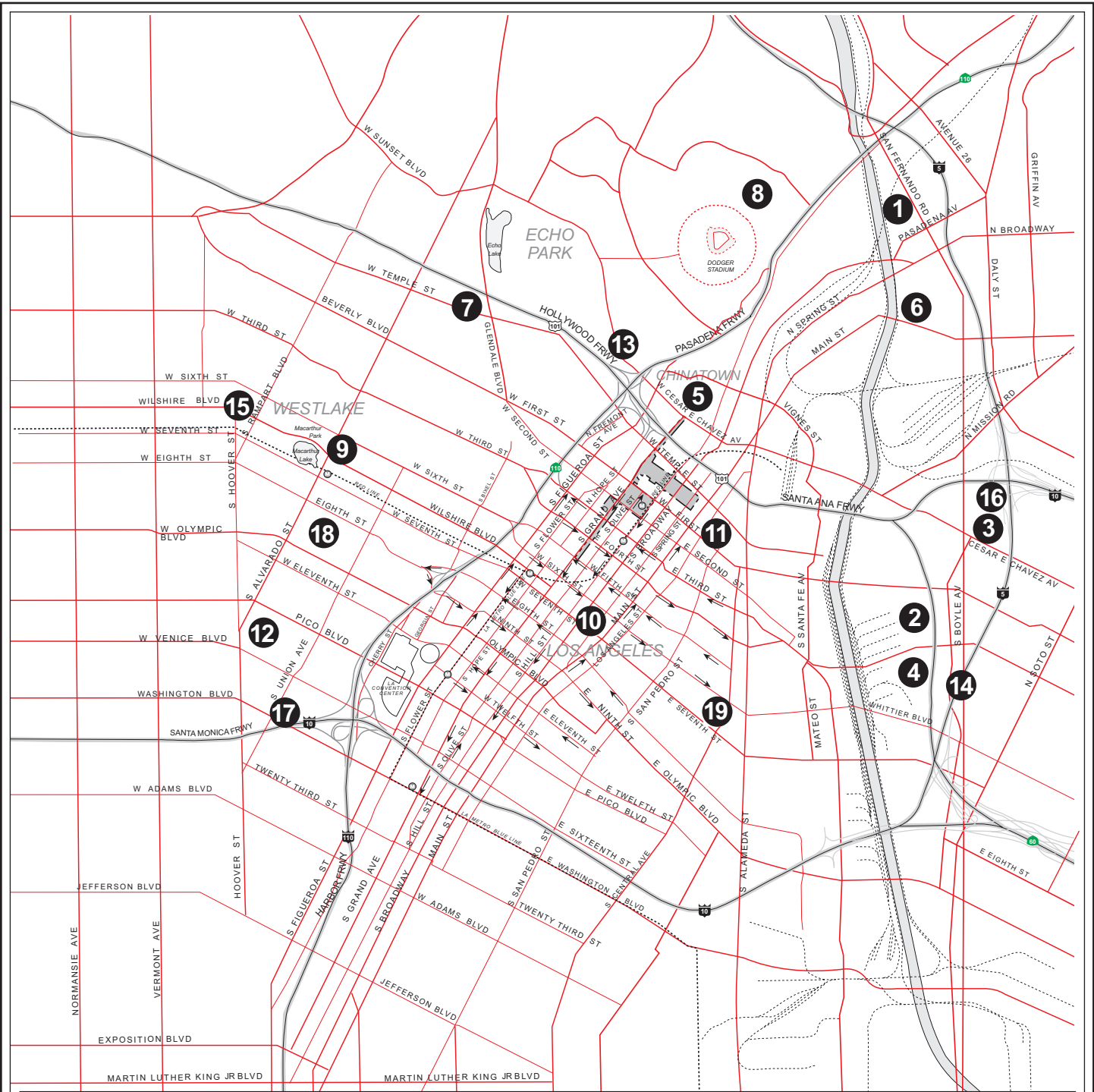
b. Existing Conditions

The City of Los Angeles Department of Recreation and Parks maintains over 15,600 acres of parkland with 387 neighborhood and regional parks, 7 lakes, 176 recreation centers, 372 children's play areas, 13 golf courses, 387 tennis courts, 8 dog parks, 58 swimming pools and 7 skate parks.¹⁷³ Several park and recreational facilities, totaling approximately 767 acres, are located within a 2-mile radius of the Project site. Figure 50 on page 678, illustrates the parks and recreational facilities that serve the Project site:¹⁷⁴

- Sixth & Gladys Street Park — Encompasses 0.3 acres and does not offer any specialized recreational facilities.
- Aliso-Pico Recreation Center — Encompasses approximately 40 acres and includes the following recreational features: an auditorium; a lighted baseball diamond; lighted indoor basketball courts; lighted outdoor basketball courts; a children's play area; two indoor gyms, each with a capacity of 250 persons; lighted tennis courts; and lighted volleyball courts. The park also contains a multi-purpose sports field with a lighted, youth-sized ball diamond. This site is located at 370 S. Clarence Street.
- Alpine Recreation Center — A 1.9-acre facility located at 817 Yale Street, which includes an auditorium, barbecue pits, lighted indoor basketball courts, lighted outdoor basketball courts, a children's play area, a community room (capacity of 80 to 100 persons), an indoor gym, and lighted volleyball courts.
- Alvarado Terrace Park – A 1.2-acre small park located at 1341 South Bonnie Brae Street.

¹⁷³ *City of Los Angeles Department of Recreation and Parks, website, www.laparks.org/dept.htm, accessed January 27, 2006.*

¹⁷⁴ *City of Los Angeles Department of Recreation and Parks, Center Locator, website, <http://gis.lacity.org/recandpark/recandpark.htm#>, accessed January 27, 2006 and Letter correspondence from Michael A. Shull, Superintendent with the City of Los Angeles Department of Recreation and Park, dated January 23, 2006.*



LEGEND

 Project Site

- 1) LA Youth Athletic Club, 401 N. Ave 19, Los Angeles, CA 90031
- 2) Pecan Recreation Center, 127 S. Pecan St., Los Angeles, CA 90033
- 3) State Street Reception Center/State Street Child Care, 716 N. State St., Los Angeles, CA 90033
- 4) Aliso Pico Recreation Center, 370 S. Clarence St., Los Angeles, CA 90033
- 5) Alpine Recreation Center, 817 Yale St., Los Angeles, CA 90012
- 6) Downey Recreation Center, 1772 N. Spring St., Los Angeles, CA 90031
- 7) Echo Park Recreation Center/Echo Park Child Care, 1632 Bellevue Ave., Los Angeles, CA 90026

- 8) Elysian Park Therapeutic Recreation Center, 929 Academy Rd., Los Angeles, CA 90012
- 9) MacArthur Park, 2230 W. 6th St., Los Angeles, CA 90057
- 10) Pershing Square Park, 532 S. Olive St, Los Angeles, CA 90013
- 11) City Hall Park Center, 200 N. Main St., Los Angeles, CA 90012
- 12) Alvarado Terrace Park, 1341 S. Bonnie Brae St., Los Angeles, CA 90006
- 13) Everett Park, Everett Street, Echo Park, CA 90026
- 14) Hollenback Park, 415 S. Saint Louis St., Los Angeles, CA 90033
- 15) Lafayette Park and Recreation Center, 2830 W. 6th St., Los Angeles, CA 90057
- 16) Prospect park, Echandia St., Los Angeles, CA 90033
- 17) Toberman Recreation Center, 1725 Toberman St., Los Angeles, CA 90015
- 18) Hope and Peace Packet Park, 843 South Bonnie Brae St., Los Angeles, CA 90057
- 19) Street Park, 6th and Gladys St., Los Angeles, CA 90021

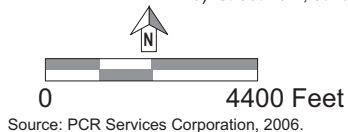


Figure 50
Park and Recreational Facilities
Location Map

- City Hall Park — This 4-acre park consists of the landscaped grounds of City Hall located at 200 North Spring Street, adjacent to the Project site.
- Downey Pool and Recreation Center — Encompasses 4.6 acres and includes an auditorium, a lighted baseball diamond, a children’s play area, an indoor gym, a multi-purpose sports field, and picnic tables. This site is located at 1772 North Spring Street.
- Echo Park Recreation Center — Located at 1632 Bellevue Avenue, this facility encompasses 29.4 acres and includes an auditorium/indoor gym with a capacity of 450 persons; a lighted baseball diamond; lighted indoor basketball courts; lighted outdoor basketball courts; a children’s play area; lighted football field; lighted tennis courts; a lighted soccer field; and three pools (two indoor, one outdoor). Additional facilities at this site include a childcare center, Echo Park Lake, and a shallow pool.
- Elysian Park and Therapeutic Recreation Center— Encompasses approximately 604 acres and includes the following recreational facilities: a 200-300 person amphitheatre; unlighted outdoor basketball courts; a children’s play area; indoor gym; barbeque pits; picnic tables; hiking trails; and two meeting rooms. This site is located at 929 Academy Road.
- Everett Park – A 0.7-acre small park located at Everett Street and Sunset Boulevard.
- Hollenbeck Park – A 21.2-acre community park located at 415 South Saint Louis Street. Facilities include an auditorium, skate-park, barbeque pits, basketball courts, children’s play area, community room, indoor gym and picnic tables.
- Hope and Peace Pocket Park — Located at 843 South Bonnie Brae Street, this pocket park encompasses one half acre and does not offer any specialized recreational facilities.
- Lafayette Park and Recreation Center – A 9.7-acre neighborhood park located at 2830 West Sixth Street. Facilities include an auditorium, basketball courts, children’s play area, community room, picnic tables, soccer field and tennis courts.
- MacArthur (General Douglas) Park and Recreation Center— Located at 2230 West Sixth Street, this park and recreation center encompasses approximately 32 acres and includes an auditorium, a children’s play area, picnic tables, and a lake with a boathouse.
- Pecan Pool and Recreation Center — Located at 127 South Pecan Street, this facility encompasses 4.3 acres and provides picnic tables, lighted outdoor basketball courts, a

children’s play area, a community room, lighted handball courts, and volleyball courts. The park also contains a multi-purpose sports field with a ball diamond.

- Pershing Square Park —This 5-acre park, located at 532 South Olive Street, hosts special events and concerts throughout the year. Facilities at this park include a seasonal ice-skating rink, a stage, and a sunken amphitheatre.
- Prospect Park – A 2.9-acre neighborhood park located at Echandia Street and Judson Street.
- State Street Recreation Center — Located at 716 North State Street, this facility encompasses 2.6 acres and includes the following recreational features: an auditorium, a lighted baseball diamond, lighted outdoor basketball courts, a children’s play area, a community room, and a multi-purpose sports field with a small lighted ball diamond.
- Toberman Recreation Center – A 2.7-acre neighborhood park located at 1725 South Toberman Street. Facilities include an auditorium, barbeque pits, baseball diamond, basketball courts, children’s play area, community room, indoor gym, and picnic tables.

Citywide, park and recreational space is provided at an estimated rate of 0.70 acre per 1,000 residents.¹⁷⁵ This ratio does not meet the City’s stated goals for the provision of 4 acres per 1,000 persons of combined neighborhood and community parkland. The Central City Community Plan area has a ratio of 0.09 acres of neighborhood and community parkland per 1,000 residents. This park ratio also falls below the target ratio as specified by the City.¹⁷⁶

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of parks and recreation impacts is based on comparing the recreational space ratio associated with the Project to the standards set forth by the Quimby Act, the LAMC, and the PRP. To be consistent with the standards set forth in the aforementioned regulatory guidance documents, the analysis of impacts is based on the acreage of recreational space available per 1,000 Project residents.

¹⁷⁵ Letter correspondence from Michael A. Shull, Superintendent with the City of Los Angeles Department of Recreation and Park, dated January 23, 2006.

¹⁷⁶ *Ibid.*

b. Thresholds of Significance

Based on the factors set forth in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would have a significant impact on recreation and park services if the Project generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services.

c. Impact Analysis

(1) Project Design Features

As discussed in Section II, Project Description, the Project consists of three components: (1) the creation of the 16-acre Civic Park, which represents and expands upon the existing Civic Mall; (2) streetscape improvements along Grand Avenue between Fifth Street and Cesar E. Chavez Avenue; and (3) development of five parcels with residential, hotel and retail uses as well as County office building uses under the Project with County Office Building Option. The streetscape improvements do not constitute usable open space and thus are not considered as proposed open space or recreational facilities.

The proposed 16-acre Civic Park is intended to facilitate a program of ongoing and special civic events and activities. The Civic Park would maintain the existing organization of space as three major areas: Grand Avenue to Hill Street; Hill Street to Broadway; and Broadway to Spring Street. Under the Conceptual Plan for the Civic Park, the westernmost, approximately 8-acre section is proposed to be utilized for cultural and entertainment uses. The middle, approximately 4-acre section would be used as a garden space for smaller scale uses and the easternmost, approximately 4-acre section would be used for daily/permanent civic and community events and activities, as well as passive park use. Currently, the easternmost section is utilized for surface parking. The Project proposes to replace the removed surface parking through renovation of the lower levels of the parking structures beneath the Civic Park area. The intent of the easternmost section, under the Conceptual Plan for the Civic Park, is to provide a setting for festivals and civic event programming, along with small pavilions that could host food and drink concessions. As such, the proposed Civic Park would increase existing park facilities from 12 acres to 16 acres.

Under the Conceptual Plan for Parcel Q, a central plaza space that emphasizes pedestrian connections to Grand Avenue and First Street, outdoor terraces, large amounts of landscaping and outdoor pools and terraces for the hotel, restaurant, and residential uses would be provided.. The outdoor public space in Parcel Q would be integrated into the streetscape improvements anticipated to occur on these streets. The pedestrian-oriented open space would include a landscaped and plaza, numerous seating areas, integrated public art and/or fountains, and a collection of gathering places. The outdoor orientation of the development on Parcel Q would

also be maximized on multiple floor levels through the use of patios, elevated walkways, and roof terraces.

The Conceptual Plan for Parcels W-1/W-2 includes a pedestrian bridge across Olive Street to connect Parcel Q's public space to public open space on Parcels W-1/W-2. This bridge would integrate Parcel Q's open space and, by extension, connect Parcels W-1/W-2 with Grand Avenue. In turn, the public open space on Parcels W-1/W-2 would provide to Parcel Q extensions to Hill Street, First Street and Second Street. Thus, the public space of Parcels Q and W-1/W-2 would provide linkages between both blocks to the surrounding streets and adjoining uses.

Under the Conceptual Plan, the proposed building structures on Parcels L and M-2 would be developed around a central courtyard that consists of an outdoor public open space. This area would incorporate a landscaped area with ground cover, shrubs, trees, and possibly water features.

Development of the proposed Project is anticipated to occur in three phases. The initial development phase includes the simultaneous completion of the Civic Park and development of Parcel Q, along with the Grand Avenue Streetscape improvements between Second and Temple Streets. The second phase of Project construction would include the development of Parcels L and M-2 and the section of the Grand Avenue Streetscape program between Second and Fifth Streets. The third phase includes the development of Parcels W-1/ and W-2 and the section of Grand Avenue Streetscape program between Temple Street and Cesar E. Chavez Avenue. Therefore, as the Civic Park would be completed in the first phase, the Project's future residents would have access to the renovated Civic Park, including the additional four acres within the easternmost section of the Park. It is also noted that the need to keep critical components of the existing Civic Mall open may result in a phased opening of the Civic Park.

(2) Analysis of Project Impacts

(a) Project with County Office Building Option

(i) Construction Impacts

Construction of the proposed improvements in Civic Park would require closure of the existing Civic Mall to implement those improvements. This would limit park availability and usage. Impacts on park usage could occur within the immediate area of construction activity and adjacent park areas that might be sensitive to construction activities. It is not known if the entire Park area would be affected at a single time, or if park improvements would be implemented on a smaller basis; e.g., block by block.

As the construction activities could adversely affect park usage, the Project is considered to have a significant, short-term impact on parks during construction. Upon completion of the Project, the affected park areas would return to operations with an enhanced level of operations, and be enlarged as well, due to the Project improvements that were implemented during the construction phase.

(ii) Operations

a. Quimby Act

Under the Quimby Act, the Project would be required to provide a maximum of three acres of parkland per 1,000 residents. The Project with County Office Building Option includes 2,060 dwelling units that are anticipated to generate approximately 2,925 residents. Accordingly, the Project with County Office Building Option is required to provide a maximum of approximately 8.8 acres of park/recreation space for its residents.

As described in the Project Design Features section, above, the Project would incorporate common and private open space areas within all five proposed development parcels. Additionally, the Project would renovate the four acres of existing parking uses east of the Civic Mall to park facilities that would feature a large paved plaza with landscaping at its north and south sides. However, the Draft EIR recognizes that the Civic Park represents a resource that is available to all the citizens of Los Angeles. Therefore, in this analysis the renovation of the existing Civic Mall as a component of the future Civic Park is not credited towards the park requirements for meeting the needs of Project residents.

As the site plan is conceptual in nature, the amount of park/recreation space available, if any, to be credited towards the maximum Quimby parkland dedication requirements for the Project's proposed residential uses would be determined during review and approval of the final map by the City's Planning and/or Building and Safety Departments. To be conservative, it is concluded that the demand for park or recreational facilities generated by the Project with County Office Building Option, per maximum Quimby Act requirements, would not be adequately accommodated by existing or planned facilities, and the potential for a significant impact on parks and recreation exists. As such, to satisfy the maximum Quimby requirement, the Related Companies would be required to do one of the following: (1) dedicate additional parkland beyond any credited park/recreation space, such that the Project would provide a total of 3 acres per 1,000 Project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide a combination of the above. Compliance with Quimby requirements would off-set the park impacts of the Project and avoid a significant impact.

(ii) Public Recreation Plan (PRP)

As previously stated, the desired long-range (minimum) standard for local parks is 2 acres per 1,000 persons for neighborhood parks and 2 acres per 1,000 persons for community parks or 4 acres per 1,000 persons of combined neighborhood and community parkland. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of 1 acre per 1,000 persons for neighborhood parks and 1 acre per 1,000 persons for community parks, or 2 acres per 1,000 persons combined.

The Project with County Office Building Option incorporates common and private open space areas within all five proposed development parcels and proposes to renovate the four acres east of the existing Civic Mall into park facilities. As the amount of parkland/recreation space available to future residents has yet to be confirmed by the City, it is conservatively concluded that the proposed Project does not meet the PRP's short- and intermediate-range standards.

(iii) City of Los Angeles Municipal Code (LAMC)

Section 12.21 of the LAMC requires that all buildings containing six or more dwelling units on a lot must provide a minimum square footage of usable open space per dwelling unit. Project open space would include landscaped outdoor areas, indoor recreational amenities for residents and a variety of public outdoor spaces. The Project's open space would be designed to comply with the open space requirements set forth in Section 12.21 of the LAMC. Compliance with these open space requirements would be determined during review and approval of the final map by the City's Planning and/or Building and Safety Department.

Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum density permitted within the zone where it is located. The Project's 8.6 acres of residential development would be developed at a R5 density, which allows residential development to be developed to a maximum density of over 200 dwelling units per acre. Based on the provisions set forth in LAMC Section 17.12, 32 percent of the gross subdivision area, or 2.75 acres would be required to be dedicated.

As the site plan of the Project with County Office Building Option is conceptual in nature, the amount of park/recreation space available, if any, to be dedicated for park and recreation purposes would be determined during review and approval of the final map by the City's Planning and/or Building and Safety Department. In order to satisfy the requirements of Section 17.12 of the LAMC, the Related Companies would be required to do one of the following: (1) dedicate additional parkland beyond any credited park/recreation space, such that

the Project would provide a total of 2.75 acres; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide a combination of the above. Compliance with Section 17.12 would off-set the park impacts of the Project with County Office Building Option and avoid a significant impact.

(b) Project with Additional Residential Development Option

As was the case with the Project with County Office Building Option, construction activities within the Civic Park area for the Project with Additional Residential Development Option would cause a significant, short-term impact. Upon completion of the Project, the affected park areas would return to operations with an enhanced level of operations, and be expanded as well, due to the Project improvements that were implemented during the construction phase.

The Project with Residential Development Option provides for an additional 600 residential units in lieu of the 681,000 square feet of County office building proposed by the Project with County Office Building Option. Under the Project with Additional Residential Development Option, the resident population would increase to 3,777 persons, an increase of 852 persons. At the same time, total employment under this Option would decrease to 1,206 jobs, a decrease of 2,724 jobs. All other components of the Project with County Office Building Option are the same under the Project with Additional Residential Development Option. Thus, the difference in demand for parks and recreation facilities between the two Options results from the additional demand associated with the addition of 852 persons.

As discussed above, the dedication of parkland is driven by the number of residents. The more residents generated by a particular project, the more parkland and open space that would be required. Because it has been conservatively concluded that the Project with County Office Building Option would not meet the demand for park or recreational facilities per maximum Quimby Act, PRP, or LAMC Section 17.12 requirements, it can be concluded that the Project with Additional Residential Development Option, which would generate more residents than the Project with County Office Building Option, would not meet its demand for park or recreational facilities either. However, as was the case with the Project with County Office Building Option, compliance with the Quimby provisions and Section 17.12 of the LAMC would off-set the park impacts and avoid a significant impact.

4. CUMULATIVE IMPACTS

No related projects are known to affect the use or availability of any existing recreational resources during either their construction or operations phases as the Project would prohibit the recreational use of the existing Civic Center Mall during construction, cumulative impacts on recreational resources are considered significant since the Project, in and of itself, would result in

a short-term significant impact on the recreational resources within the existing Civic Center Mall.

As the demand for parks and recreation facilities is attributable to the Project's residents, this analysis focuses on the cumulative impacts of the Additional Residential Development Option in conjunction with the related projects. This approach is taken since this analysis would identify cumulative impacts that are greater than those that would result from the combination of the Project with the County Office Building Option and the identified related projects. As the Project with the County Office Building Option would generate a demand for parks and recreation facilities that are less but similar to the Project with the Additional Residential Development Option, it is conservatively concluded that the cumulative impacts of the Project with the County Office Building Option are the same as those analyzed below.

Section III.B of this Draft EIR provides a list of the related projects that have the potential to occur concurrent with the development of the proposed Project. Of the related projects identified in Section III.B, all are located within a 2-mile radius of the Project site. The total population for the related projects is estimated to be 28,952, based on a forecasted average household size of 1.63 residents per unit.

The 3,777 residents under the Project with Additional Residential Development Option, plus the 28,592 residents associated with the related projects would result in a cumulative population increase of approximately 32,729 residents. The estimated park space requirement to meet the standards for this additional population would be: 65.5 acres to meet the PRP's short- and intermediate-range standards for community and neighborhood parks and roughly 98.2 acres to meet the three-acre per 1,000 residents standard.

As is the case with the Project, the related projects would be subject to LAMC Sections 12.21 and 17.12 with regard to the provision of open space. As each related project would comply with the requirements established under the Quimby Act and LAMC Sections 12.21 and 17.12, potential park and open space impacts of the related projects would be met. Therefore, cumulative impacts are also concluded to be less than significant as the demand for parks and open space attributable to cumulative development would be met through compliance with the requirements of the Quimby Act and LAMC Sections 12.21 and 17.12.

5. MITIGATION MEASURES

The proposed Project would have a significant impact with regard to parks and recreation services. In response, the following mitigation measure has been identified.

Mitigation Measure

Mitigation Measure I.4-1: Prior to the issuance of a certificate of occupancy, Related, with regard to the five development parcels, shall: (1) dedicate additional parkland such that the Project would provide a total of 3 acres per 1,000 Project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) a combination of the above. Compliance with this measure shall be determined by the City's Department of Building and Safety, or other appropriate City agency or department.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction of the Project would require the closure of the existing Civic Mall for varying durations of time to implement the proposed improvements, as well as Project construction adjacent to the Civic Mall. The potential effects on park use due to construction activity is considered to be a significant, short-term impact. Upon completion of the Project, the affected park areas would return to operations with an enhanced level of operations, and be expanded as well, due to the Project improvements that were implemented during the construction phase.

With regard to Project operations, potential significant impacts to park and recreational facilities associated with the Project would be reduced to a level that is less than significant through compliance with regulatory measures established for the purposes of expanding parklands commensurate with new development. This occurs through Project compliance with the requirements set forth in LAMC Section 12.21 and LAMC Section 17.12. Thus, the Project would meet the demand for parks addressed through those provisions. Therefore, potential impacts to park and recreational facilities attributable to the Project's operation would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
5. LIBRARIES

1. INTRODUCTION

This section addresses potential impacts on the facilities and services administered by the City of Los Angeles Public Library (LAPL). The analysis focuses on whether available library capacity is sufficient to accommodate the population growth generated by the proposed Project.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) Los Angeles General Plan

The City of Los Angeles General Plan Framework (Framework), adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City of Los Angeles and defines Citywide policies regarding land use, including infrastructure and public services. At the time the General Plan Framework was formulated, it recognized that deficiencies in library services existed and, as such, set forth goals and policies for the provision of adequate library services and facilities to meet the needs of the City's residents. Policy 9.20.1 proposes the development of library standards dealing with a facility's net floor area, the appropriate number of permanent collection books per resident, and service radii. Policy 9.20.2 proposes the development of a Citywide policy for locating non-English language permanent collections. Under the General Plan Framework Implementation Programs, Plans and Policies Chapter, Policy 13, the Department of Libraries is charged with the responsibility of updating the Library Master Plan to correct existing deficiencies and to meet the needs of future growth. Other applicable policies include the following:

- Identify improvements including new library facilities; alternatives to “stand alone facilities;” new methods for acquiring books and equipment; ways to connect library telecommunications services with other city agencies, as well as local college and university systems; and ways to identify regional libraries that are appropriate for non-English language collections, consistent with neighborhood needs.

- Strategies that enhance the viability of joint development and joint-use opportunities with large commercial projects and the Los Angeles Unified School District, thereby increasing the distribution of library services.
- Establish a new City library standard that is based on the needs, and reflects the character, of the City.
- Funding sources and mechanisms for facility improvements may include Citywide assessments, state and federal grants, and the solicitation of private donations for collections, audio-visual equipment, and computer materials.

Many of the policies of the General Plan Framework pertinent to libraries have been addressed through the Los Angeles Public Library Branch Facilities Plan, which is discussed below.

(2) Los Angeles Public Library Branch Facilities Plan

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) guides the construction, maintenance, and organization of public libraries and specifies standards in defining geographic service areas and the size of branch facilities. The Facilities Plan also outlines the required facility expansion needs of the libraries within the City. Under the Facilities Plan, the service population for branch libraries is defined according to total floor area, as shown in Table 81 on page 690.

In November 1998, City of Los Angeles voters approved the 1998 Library Bond Program, to provide \$178.3 million to construct 30 new branch libraries and to renovate and expand two existing library facilities. The 1998 Library Branch Facilities Plan, which described the funding, sizes, and geographic locations for new or renovated branch libraries, served as the basis for Proposition 1 and the Library Bond Program. The Library Branch Facilities Branch Plan is continually assessed and updated through annual and quarterly Library Bond Program Master Schedule reports. Between 2002 and 2004, the City Council added four additional branch libraries to the scope of the total facilities program. Under the total program, 18 existing library buildings have been demolished and replaced with new library buildings on the same sites; 14 new sites have been acquired and the new library buildings and parking facilities have been constructed; and four existing library buildings and associated facilities have been renovated and expanded.¹⁷⁷ Under the Library Bond Program Master Schedule, all 32 branch libraries in the original scope were scheduled for completion within six years from passage of the

¹⁷⁷ LAPL 1998 Library Bond Program Quarterly Report, Los Angeles Public Library Bureau of Engineering, Bond Update (October 2005).

Table 81**City of Los Angeles Public Library Branch Building Size Standards**

Population Served	Size of Facility
50,001 to 100,000	12,500 sq.ft.
35,001 to 50,000	10,500 sq.ft.
25,001 to 35,000	9,000 sq.ft. ^a

^a Facilities 9,000 square feet in size are no longer included in the 2004 LAPL facilities program.

Source: Los Angeles Public Library Branch Facilities Plan, adopted 1988, revised 1998, Los Angeles CEQA Thresholds Guide.

Library Bond measure. According to the Library Bond October 2005 Update, construction of all of the original 32 library projects is complete.

With additional monies available through a \$2.9 million block grant, \$1.5 million in donations, \$22.5 million in interest earnings, and \$5.3 million from the State Proposition 14 grant, the total budget for the Library Bond Program is \$210.5 million. As a result, four new projects have been added to the program. Of the four projects that have been added, the construction of one project is complete; the construction of one is underway; and the remaining two are in the design phase.

The Los Angeles Public Library (LAPL) is a member of the Metropolitan Cooperative Library System (MCLS), an association of public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. The LAPL also participates with other library systems in the “Library of California,” a network of public and private California libraries. Participation in these programs allows individuals to use their library cards in multiple jurisdictions, and for member libraries to receive compensation for such use.

b. Existing Conditions

The LAPL system provides library services to all areas of the City of Los Angeles. The LAPL consists of the Central Library and 71 branch libraries, with an inventory of 6.4 million items and 2,100 computer workstations with access to the Internet and 180 electronic databases. LAPL facilities were visited over 14 million times this year.¹⁷⁸

¹⁷⁸ LAPL and the Library Foundation of Los Angeles Annual Report 2004-2005.

Library facilities within two miles of a project site are generally considered to be within the service area of a project.¹⁷⁹ As shown in Figure 51 on page 692, there are a total of seven LAPL branch libraries within an approximate two-mile radius of the Project site. LAPL libraries that could potentially serve the Project include: the Central Library, Little Tokyo, Chinatown, Echo Park, Pico Union, Felipe de Neve, and Edendale. The LAPL has identified the Central Library as the facility that would primarily serve the Project site.¹⁸⁰ In addition, due to the proximity of the Project site to other libraries, the LAPL has identified the Little Tokyo Library and the Chinatown Library as facilities that may also serve the Project.

The Central Library is located adjacent to the southwest boundary of the Project's streetscape program at 630 West Fifth Street. This facility serves the entire City including local residents seven days and four nights a week and the retail/commercial population during the workday. This branch, which is the closest to the Project site, is 500,000 square feet in size and has a collection of 6,347,267 items. The Central Library has 180 staff positions and serves 7,000 people per day.¹⁸¹ There are no plans for library expansion or the construction of a new library in the service area as current demand at the Central Library is being adequately met.¹⁸²

The Chinatown Library is located at 639 North Hill Street, west of the 101 Freeway. The Echo Park Library is located at 1410 West Temple Street, northwest of the 110 Freeway. The Little Tokyo Library is located less than one mile to the east of the Project site at 203 South Los Angeles Street.

3. PROJECT IMPACTS

a. Methodology

The impact of a project on library services is based mainly on a comparison of the future residential population that would be served by the library (i.e., the estimated population generated by the project, combined with anticipated growth in the service area) to the target service population for the particular library, as defined by the LAPL. The assessment of potential Project impacts on library facilities is determined based on the following steps: (1) identify the primary service library or libraries that serve the Project site; (2) forecast the population generated by the Project; (3) identify the population within the library's service area

¹⁷⁹ *City of Los Angeles CEQA Thresholds Guide (1998)*

¹⁸⁰ *Letter to PCR from Anne Connor, Central Library Director, LAPL, November 22, 2005.*

¹⁸¹ *Ibid.*

¹⁸² *Ibid.*



LEGEND

- 1) Central Library, 630 W. 5th St., Los Angeles CA
- 2) Pico Union Branch Library, 1030 S. Alvarado St., Los Angeles, CA
- 3) Eden Dale Branch Library, 2011 W. Sunset Blvd., Los Angeles, CA
- 4) Little Tokyo Branch Library, 203 S. Los Angeles St., Los Angeles, CA
- 5) China Town Library, 639 N. Hill St., Los Angeles, CA
- 6) Echo Park Library, 1410 W. Temple St., Los Angeles, CA
- 7) Felipe De Neve Library, 2820 W. 6th St., Los Angeles, CA

Project Site

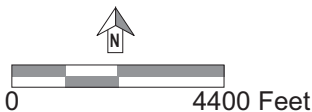


Figure 51
Library Location Map

Source: PCR Services Corporation, 2006.

at the time of Project buildout; (4) combine the Project's population with the forecasted service area population; and (5) compare the combined population to the target population for the library as determined by the LAPL.

b. Significance Thresholds

Based on the factors set forth in the City of Los Angeles CEQA Thresholds Guide (1998), the proposed Project would have a significant impact on library services if the Project would generate a demand for library facilities or services that would cause an increase in the community population which would exceed the LAPL-defined target service population.

c. Analysis of Project Impacts

(1) Project with County Office Building Option

The Project with County Office Building Option would generate an estimated residential population of 2,925 within the LAPL service area. As aforementioned, the analysis of impacts would include all three of the libraries recognized by the LAPL as having the potential to be impacted by the proposed Project: the Central Library, the Little Tokyo Library, and the Chinatown Library.

Development of the Project with County Office Building Option would cause an increased demand on LAPL facilities as a result of the additional residential population, retail employees and patrons, County office workers, and visitors. The 2,925 residents would utilize LAPL facilities most heavily during evenings and weekends. The development of the Project's other components would also generate demand for library services but to a lesser extent. The retail space would generate roughly 898 employees as well as patrons. Visits to LAPL facilities by retail employees would be limited due to the nature of retail employment. A large percentage of retail employees work on a part-time and seasonal basis, and thus, are not expected to spend extensive amounts of time outside of work using public facilities in the Project area. In addition, break times are typically not long enough (10 to 30 minutes on average) for employees to take advantage of nearby library services and facilities and return to work within the allotted time. The estimated 2,724 County office workers generated by the Project would mainly utilize the libraries during the daytime hours. Additional demand may also be generated from the 275-room hotel, and Civic Park activities, which would attract more visitors and tourists to the Project area. The Project's commercial component would incrementally increase the utilization of LAPL facilities and would not significantly impact the Central Library, the Little Tokyo Library or the Chinatown Library.

Though LAPL usage may incrementally increase as a result of the Project's commercial component and streetscape program, it is anticipated that the Project's residents would be the primary visitors to the LAPL's library facilities. The analysis assumes that one-half of the residents would utilize the Little Tokyo Library and one-half of the residents would utilize the Chinatown Library. However, it is conservatively assumed that all Project residents would utilize the Central Library.

Development of the Project with County Office Building Option is not expected to cause an increase in the community population that would exceed the LAPL-defined target service population. The Central Library, which would be most utilized by the proposed residents, is a main library facility that provides for a larger regional area compared to other branch libraries in the LAPL system. However, because this facility is located near the downtown, it is anticipated that most of its current clientele is oriented toward the downtown business area and primarily utilize this facility during daytime hours. Use of this facility by the proposed residents would not conflict with its current uses such that the facility would require expansion. Furthermore, the collective resources of the Central Library combined with the Little Tokyo Library and the Chinatown Library resources would provide for greater efficiency in accommodating the Project's residents. Therefore, the Project with County Office Building Option would not generate a demand for library facilities or services that would cause an increase in the community population which would exceed the LAPL-defined target service population.

LAPL has indicated that (a) the Project would have an impact on the Central Library, (b) that fees in the amount of \$200 per capita based on the Project's forecasted population be paid to off-set the increase in service demand and facility usage, and (c) that the payment of such a fee should allow the Central Library to meet the needs of the Project.¹⁸³ However, the detailed analysis provided in this section of the Draft EIR demonstrates that the Project would not cause a significant impact on library services, and the LAPL did not provide any data in its NOP response letter to the contrary. (In addition, it should be noted that the LAPL has not taken the necessary legal steps to impose a mitigation fee on all new development projects in its jurisdiction.) Accordingly, no mitigation measures are required.

(2) Project with Additional Residential Development Option

The Project with Additional Residential Development Option would consist of up to 600 additional residential units that would be developed in place of the 681,000 square feet of office space proposed by the Project with County Office Building Option. Construction of the 600 additional residential units would take place on Parcel W1/W2 where the County office uses proposed by the Project with County Office Building Option are planned to be located. As such,

¹⁸³ Letter to PCR from Anne Connor, Central Library Director, LAPL, November 22, 2005.

the impacts to library facilities associated with the non-residential component of the Project with Additional Residential Development Option would be incrementally reduced when compared to the Project with County Office Building Option, due to the elimination of the 2,724 workers associated with the potential County office building. As such, impacts from the non-residential components of the Project with Additional Residential Development Option would be less than the non-residential components of the Project with County Office Building Option.

As the Project with Additional Residential Development Option would add 600 residential units when compared to the Project with County Office Building Option, there would be an increase in residential population from approximately 2,925 persons to 3,777 persons. Accordingly, use of the library facilities would incrementally increase. Similar to the Project with County Office Building Option, the collective resources of the Central Library combined with the Little Tokyo Library and the Chinatown Library resources would provide for efficiency in accommodating the residents associated with the Project with Additional Residential Development Option. Therefore, implementation of the Project with Additional Residential Development Option would not generate a demand for library facilities or services that would cause an increase in the community population which would exceed the LAPL-defined target service population.

4. CUMULATIVE IMPACTS

Of the 93 related projects identified in Section III.B of this Draft EIR, a number of residential projects are located within two miles of the Little Tokyo Branch Library, the Chinatown Branch Library, or the Central Library. These projects would provide a total of 17,762 residential units with a forecasted population of 28,952 persons. Combined with the 2,925 residents associated with the Project with County Office Building Option, the cumulative residential population would be 31,877. The Project with Additional Residential Development Option in conjunction with the related residential projects would result in a total population of 32,729 persons. These populations could potentially increase the service demand and usage at the Tokyo Branch, Chinatown Branch, and Central Libraries. Other related projects may or may not pay LAPL per capita library fees based on each respective project's forecasted population. Payment of such fees would offset the increase in service demand and facility usage. As noted above, the LAPL has not taken the necessary legal steps to impose a mitigation fee on all new development projects in its jurisdiction. In the event that the related projects were to be developed without the payment of fees, significant impacts on library services may occur.

5. MITIGATION MEASURES

The Project would result in no significant impacts on library services, and no mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable adverse impacts relative to LAPL facilities and services would occur as a result of the Project.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. UTILITIES
1. WATER SUPPLY

1. INTRODUCTION

This section addresses the potential impacts of the Project on the water supply and whether there is sufficient water capacity to meet the Project's demand. Water supply and conveyance was analyzed using data from the Water Supply Assessment prepared by the Los Angeles Department of Water and Power (LADWP), dated April 13, 2006. The analysis is also based on a technical report prepared by Psomas for the Project, dated June 5, 2006. The Water Supply Assessment and the technical report are included in Appendix G of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State Level

Efficiency Standards

Title 20 of the California Administrative Code, (CAC) Section 1604, establishes efficiency standards (i.e., maximum flow rates) for all new showerheads, lavatory faucets, and sink faucets, and prohibits the sale of fixtures that do not comply with the regulations.

Other applicable State water conservation laws include:

- Health and Safety Code Section 17921.3 requires all new buildings, as of January 1, 1983, to install water conservation water closets, as defined by American National Standards Institute (ANSI) Standard A112.19.2, and urinals and associated flushometer valves that use less than an average of 1.5 gallons per flush.
- Title 20, CAC, Section 1604(f) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory and sink faucets, as specified in ANSI A112.18.1M-1979.

- Title 20, CAC, Section 1606(b) prohibits the sale of fixtures that do not comply with regulations.
- Title 24, CAC, Section 2-5307(b) prohibits the installation of fixtures unless the manufacturer has certified compliance with the flow rate standards.
- Title 24, CAC, Section 2-5352(i) and (j) address pipe insulation requirements that can reduce water used before hot water reaches fixtures.

California Urban Water Management Plan

The California Urban Water Management Planning Act requires every municipal water supplier that serves more than 3,000 customers or provides more than 3,000 acre-feet per year (af/yr) of water to prepare and adopt an Urban Water Management Plan (UWMP). UWMPs must include estimates of past, current, and projected potable and recycled water use, identify conservation and reclamation measures currently in practice, describe alternative conservation measures, and provide an urban water shortage contingency plan. UWMPs are required to be developed every five years to identify short- and long-term water demand so as to meet growing water demands during normal, dry, and multi-dry years.

LADWP is the water supplier responsible for providing water within the City limits and ensuring that the quality of the water delivered meets applicable State health standards for drinking water. Details of LADWP's efforts to promote the efficient use and management of its water resources are contained in its Year 2005 Urban Water Management Plan (UWMP). LADWP bases its water demand projections on historical trends in billing data, projections of water conservation, and projections of demographics provided by the Southern California Association of Governments (SCAG). The 2005 UWMP addresses existing and new state requirements, and discusses sustainability, climate change, water quality issues, and regional coordination efforts impacting the City's water resources.¹⁸⁶ In addition, the 2005 UWMP contains a revised demand forecast that has factored in the water demand for water supply assessments that have been prepared, as well as future demands.

SB 610 and SB 221

Additional State legislation, Senate Bill 221 (Kuehl) and Senate Bill 610 (Costa), expands upon the requirements of the California Urban Water Management Planning Act.

¹⁸⁶ *Los Angeles Department of Water and Power, Urban Water Management Plan, Fiscal Year 2003-2004 Annual Update, 2004.*

Senate Bill 610 (SB 610) recognizes the need to link water supply and land use planning as currently required by Section 10910 of the Water Code. Under certain circumstances, a city or county is required to request, in conjunction with a development project, a water supply assessment containing specific information from the water service provider.

SB 610 requires the water service provider to prepare a water supply assessment requested by a city or county for any “project” defined by Section 10912 of the Water Code that is subject to CEQA. The bill prescribes a timeframe within which a public water system is required to submit the assessment to the city or county and authorizes the city or county to seek a writ of mandamus to compel the public water system to comply with the requirements relating to the submission of the assessment. If the provider determines that water supplies are, or will be, insufficient, plans must be submitted for acquiring additional water supplies. Additionally, the bill requires a city or county to include the water supply assessment and other pertinent information in any environmental document prepared (e.g., EIR) for the project pursuant to the act.

Under SB 610, a water supply assessment must be evaluated and approved for larger projects (i.e., residential projects with more than 500 dwelling units, shopping centers employing more than 1,000 persons or having more than 500,000 square feet of floor space, or commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space). The approved water supply assessment, which evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and how they would be secured if needed, must be incorporated into the EIR for individual projects. Based on the quantity of development proposed, a water supply assessment for the Project was prepared and certified by LADWP.

Similarly, Senate Bill 221 (SB 221), a companion bill to SB 610, modifies state law (i.e., the Government Code, Subdivision Map Act and the Business and Professions Code) to focus on the link between water supply and land use planning. SB 221 requires “written verification” of water availability for large subdivision projects. While distinct from SB 610, it requires a similar demonstration of water availability. LADWP, as a water service supplier, has incorporated the provisions of SB 221 and SB 610 into its water supply planning process. The Project is subject to the requirements of both SB 221 and SB 610.

(2) Local Level

The LADWP is the water purveyor serving the Project area. In recent years, conservation has become an important element of managing the water supplies of Southern California. To this end, LADWP has prepared a UWMP to promote efficient use and management of its water resources.

In addition to summarizing historic, present, and projected water demand and water supply sources, the City's Plan outlines the strategies that will be used to meet the City's current and future water needs, within the following categories:

- Protect existing water supplies from contamination and clean up groundwater supplies;
- Pursue cost-effective water conservation and recycling projects to increase supply reliability and offset increases in water demand due to growth;
- Seek outside funding to offset capital investments needed to develop alternative supplies such as conservation and recycling projects and resource management programs; and
- Maintain the structural integrity of the Los Angeles Aqueduct and in-City water distribution systems.

In order to reduce the impact of potential supply deficiencies, the Los Angeles City Council has enacted ordinances mandating measures to reduce water consumption. Ordinance Nos. 163,532 and 164,093, enacted in 1988, with subsequent amendments, require new buildings to install all low-flush toilets and urinals (maximum 1.5 gallons per flush) in order to obtain building permits. Ordinance No. 163,532 also contained provisions requiring xeriphytic (low-water consumption) landscaping. This was superseded by Ordinance No. 170,978, which was approved by the City Council in April 1996 and has been in place since July 12, 1996. Ordinance No. 170,978 is a comprehensive landscape ordinance that applies to all projects except single-family dwellings that create 2,000 sq.ft. or more of non-permeable surface. The Ordinance replaces the blanket requirement for xeriscape with "Water Management." Although a xeriscape point system chart is still used, it has been slightly augmented by increased choices as well as strengthened so that projects have to propose and document substantive water conserving features and techniques. The measures described in the above-mentioned ordinances are considered baseline project permitting conditions.

b. Existing Conditions

(1) Water Capacity

The water needs of the City of Los Angeles are served by the LADWP. This public utility obtains its water supplies from three major sources: (1) the Owens Valley and the Mono basin on the east side of the Sierra Nevada Mountains by way of the Los Angeles Aqueduct (LAA); (2) Northern California and Colorado River imports from the Metropolitan Water District of Southern California (MWD); and (3) local groundwater basins, including the San

Fernando, Sylmar, Central Coast and West Coast Basins. In addition to these sources, some wastewater within the LADWP service area is reclaimed for reuse for irrigation, industrial use, and groundwater recharge.

In 2005, water consumption by the nearly four million residents of the City totaled approximately 661,000 acre-feet per year.¹⁸⁷ LADWP projects citywide water use to increase to 800,000 acre-feet by the year 2020.¹⁸⁸ Currently, residential consumers account for the largest share of water usage at 414,636 acre-feet (72%), followed by commercial and government facilities at 147,793 acre-feet (25%), and industrial facilities at 21,319 acre-feet (3%).¹⁸⁹

During the 1980s, per person water use had averaged more than 180 gallons per day per person. As a result of drought, wet weather, and economic recession, from 1991 to 1995, per capita water use decreased to about 145 gallons per day per person. The average per capita use is currently 135 gallons per day per person. The overall decline in water use from the 1980s to current conditions is attributed to long-term water conservation measures implemented by the City. The LADWP has invested more than \$164 million in conservation programs since 1991.¹⁹⁰

LADWP's 2005 UWMP is providing for future growth in population in its service area and for an increasing demand for water. The City-wide growth rate was assumed in the 2005 UWMP. LADWP determined future service reliability in average, single dry-year, and multi-year drought conditions, and has projected that under the three conditions water supply through 2030 will be reliable and adequate to meet expected demands. In a dry-weather year, water demands are anticipated to be approximately five percent greater than normal demands. The average year water supplies in 2030 is estimated by LADWP at approximately 897,200 acre feet, while 2030 dry year supplies are anticipated to be 934,200 acre feet.¹⁹¹ The plan for meeting the increasing demand for water relies on continued conservation measures, increased use of recycled water as well as reliance on the three primary sources of water: the Los Angeles Aqueduct, local groundwater and water purchases from the MWD.

¹⁸⁷ *An acre-foot equals approximately 326,000 gallons, which serves the water needs of approximately five people annually in the City of Los Angeles.*

¹⁸⁸ *www.ladwp.com.*

¹⁸⁹ *LADWP 2005 Urban Water Management Plan.*

¹⁹⁰ *Ibid.*

¹⁹¹ *Ibid.*

(2) Water Infrastructure

LADWP's water distribution system provides for more than 7,200 miles of pipe and approximately 680,000 service connections throughout its 465-square-mile service area. It also provides for 59,000 fire hydrants across the City.

There is neither existing demand nor existing water service on the five parcels that are currently being used for parking. The five parcels are located adjacent to existing water main lines in the surrounding streets.

Parcel Q is bounded by two, 12-inch water mains to the northwest along Upper Grand Avenue, an 8-inch water main to the northeast along First Street, a 12-inch water main to the southeast along Olive Street, and a 12-inch water main to the southwest along Second Street.

Parcels W-1 and W-2 are bounded by a 12-inch water main to the northwest along Olive Street, an 8-inch water line to the northeast along First Street, and two 12-inch water lines to the southeast along Hill Street.

Parcel L is bounded by a 6-inch water line to the northeast along Second Street, a 12-inch water main to the northwest along Hope Street, a 12-inch water main to the southwest along General Thaddeus Kosciuszko (GTK) Way and an eight-inch and 12-inch water line to the southeast along Lower Grand Avenue. Parcel M-2 is bounded to the northeast by a 12-inch water line in GTK Way, a 12-inch water main to the northwest along Hope Street, and an eight-inch and 12-inch main to the southeast along Lower Grand Avenue.

The Civic Center Mall is bounded by a 12-inch water main along Grand Avenue to the northwest, a water main which varies from eight- to 12-inches along Temple Street to the northeast, 12- and 20-inch water mains in Spring Street to the southeast, an eight-inch water main to the southeast in Broadway, an eight-inch water main to the southeast in Main Street, and an eight-inch water main to the southwest along First Street. There is irrigation service totaling approximately 58,400 gallons per minute (gpm) for the Civic Center Mall. There is no irrigation service for landscaping along the Grand Avenue Corridor.

The eight-acre portion of the Civic Center Mall bounded by Grand Avenue and Hill Street contains a water feature and a small coffee shop. As the water feature recirculates its water, there is no recurring demand attributable to this element of the Civic Center Mall, whereas the small coffee shop has four sinks and one toilet. The plumbing fixtures within the coffee shop use approximately 1,200 gallons of water per day. In addition, the eight-acre park area of the Civic Center Mall includes approximately 2.75 acres of landscaping. Irrigation associated with the landscaping uses approximately 9,845 gallons per day (gpd) of water. The four-acre Court of

Flags that is located within the Civic Center Mall contains a landscaped area of approximately 1.5 acres that uses approximately 5,370 gpd for irrigation. Given the above, the Civic Center Mall generates an overall water demand of 16,415 gpd.

City water mains are designed to meet fire flow requirements established by the Fire Department according to land use, as set forth in the Fire Code of the Los Angeles Municipal Code, Section 57.09.06. Please refer to Section IV.I, Fire Services, for additional information regarding the Project's fire flow requirements as they relate to LAFD's fire suppression capabilities.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The LADWP has provided a forecast of the proposed Project's potable water demand as part of the water supply assessment prepared for the Project. The following analysis incorporates this forecast, as well as data from the technical report prepared by Psomas, to determine the potential impacts of the Project on water supply. As such, the following analysis is based on the anticipated increase in water demand resulting from Project implementation, relative to the City's existing water supply capacity and water distribution system. Water supply consumption calculations were determined using sewer generation rates provided by the City of Los Angeles Bureau of Engineering. The technical report utilized historic water usage as the baseline for conclusions regarding anticipated demand.

For the purpose of this analysis, it is assumed that the Project comprises three components: the built structures proposed for the five parcels, the Grand Avenue streetscape, and the Civic Park. To determine consumption estimates for the built structures, factors from the Los Angeles Bureau of Engineering were multiplied by the Project's land uses provided in the Project Description, according to the proposed square footage for commercial, retail and office uses; the number of hotel rooms; the number of residential dwelling units; or Project facilities, as appropriate. To determine consumption estimates for the streetscape, it is anticipated that associated improvements would involve approximately one acre of landscaping.¹⁹²

Based on the current Conceptual Plan, the Civic Park would include both greenscape and hardscape areas. As a final design for the Civic Park has not been completed, this analysis takes a conservative approach to forecasting anticipated water demand generated by the Civic Park by

¹⁹² Assumption based on a 10-foot wide planting strip located on the east and west sides of Grand Avenue as part of the streetscape program.

assuming that the park would be composed of approximately 14 acres of greenscape and two acres of hardscape, within which a 10,000-square foot restaurant and public restroom facilities would be located. Furthermore, it is anticipated that the final park design would include more than two acres of hardscape areas. As such, the park's actual water demand would be less than that analyzed in this Draft EIR. Therefore, the analysis presented herein reflects a conservative estimate of the water demand attributable to the Civic Park.

The Conceptual Plan for the Civic Park divides the park into three major areas. With regard to restrooms, it is assumed that there would be one restroom facility in each of the three areas of the park. Each of the three facilities would consist of 14 toilets and 8 sinks, for an overall total of 42 toilets and 24 sinks in the park.

In addition, it is reasonable to assume that event pavilions and food-related kiosks could locate within the park after Project operation has begun. In cases of special use occasions in which event pavilions would be utilized, it is anticipated that portable toilets would be provided specifically for each event by a private vendor and removed thereafter, should additional restroom facilities beyond those currently provided be warranted. As such, the event pavilions would not generate a water demand in excess of what is analyzed below. It is also assumed that no cooking would occur on site and therefore no water associated with the food kiosks would be required.

b. Thresholds of Significance

Based on the factors set forth in the City of Los Angeles *CEQA Thresholds Guide* (1998), the proposed Project would have a significant impact on water supply if:

- The public water system's total projected water supplies available during normal, single dry and multiple dry water years during the current 20-year projection would not meet the projected water demand associated with the proposed Project, as well as all other future uses, including agricultural and manufacturing uses.
- The estimated water demand for the Project would exceed the available capacity within the distribution infrastructure that would serve the Project site.
- The construction of a new or upgraded water distribution infrastructure would result in substantial obstruction of vehicle and/or pedestrian access.

c. Impact Analysis

(1) Project with County Office Building Option

(a) Construction

Water would be used in the short-term during construction for demolition, excavation, grading, dust suppression, the mixing and pouring of concrete, and other construction-related activities. Water usage for such purposes would, however, be intermittent throughout construction and temporary in nature, and would not exceed that of the completed development. As such, demolition and construction activities would require minimal water and demand is not anticipated to have any adverse impact on the available water supply or the existing water distribution system. Therefore, no significant impact to water supply is anticipated to occur during construction of the Project with County Office Building Option.

The water distribution system for the Project with County Office Building Option would likely require new connections to the existing water mains. The precise size and locations of the services would be developed once final site plans for the Project with County Office Building Option have been developed.

Construction involving connections to the water mains could involve trenching, backfilling, and repaving of the affected roadways. Such construction could result in temporary street lane and sidewalk closures in the immediate area of the Project site. Public detour routes would be established, as necessary, to divert pedestrians and traffic from the affected street segments. These detours would be temporary and limited in nature. Nonetheless, such construction associated with modifications to the water supply system would be considered a secondary impact, as it may obstruct pedestrian and vehicle access to the site. The analysis of Project impacts on traffic and circulation includes a discussion of construction impacts, and recommends a Traffic Management Plan as a mitigation measure. With incorporation of this mitigation, short-term impacts on pedestrian and traffic access would be less than significant.

(b) Operation

(i) Water Use and Supply

Development of the Project site would result in a long-term water demand for operational and maintenance uses associated with the Project with County Office Building Option. Specifically, domestic water would be required for residential units, offices, restaurants, hotel uses, restrooms, health club locker rooms, and landscaping. The operation of uses proposed for the Project with County Office Building Option is estimated to have a net average potable water

demand of 844,403 gpd at build out, with the maximum net demand of 1,435,484 gpd. Table 82 on page 707 presents a breakdown of proposed land uses and their corresponding estimated water demands for both average daily consumption and peak rates. As shown, the average daily water demand is generated in large part by the residential uses, as well as commercial office uses and outdoor water use.

The water infrastructure is believed to be adequate to provide for the increase in domestic and irrigation water demand and pressure, as determined by the Water Engineering & Technical Services business Unit of LADWP.¹⁹³ As such, new water mainline construction associated with domestic and irrigation water demand is not anticipated. New domestic water and irrigation meters would be provided, with new water connections to the existing LADWP water mains adjacent to the parcels as discussed above.

Compliance with state laws with regard to water conservation, including relevant provisions of Title 20 and Title 24 of the California Government Code, would result in a reduction of water consumption estimates at build out, and in turn, a reduction of the demand on City supplies.

LADWP has concluded in its Water Supply Assessment dated April 13, 2006 (see Appendix G of this EIR) that it would be able to meet the water demands of the proposed Project with County Office Building Option and of existing and other future uses over the 20-year horizon described in SB 610 and SB 221, during single year and multiple dry years. Therefore, the total estimated water demand for the Project at build out would not exceed available supplies, nor would the estimated water demand for the Project exceed the available capacity within the distribution infrastructure that would serve the Project site. Given the above, implementation of the Project with County Office Building Option would result in a less than significant impact on water supply.

(ii) Fire Flow

Fire flow is the quantity of water available or needed for fire protection in a given area, and is considered an important factor in fire suppression activities. Fire flow is normally measured both in gallons per minute (gpm) and duration of flow. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the

¹⁹³ Meeting with LADWP and Ferrain Farsai, December 7, 2005.

Table 82

Anticipated Water Demand – Project with County Office Building Option

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
PARCELS Q, L and M-2, W-1/W-2						
Commercial						
Hotel ^c	225	room	130	35,750	221	60,775
Hotel Meeting	15,000	square feet	800	12,000	1,360	20,400
Retail	307,000	square feet	80	24,560	136	41,752
Restaurant ^d	92,000	square feet	900	82,800	1,530	140,760
Health club	50,000	square feet	800	40,000	1,360	68,000
Office	681,000	square feet	180	<u>122,580</u>	306	<u>208,386</u>
<i>Subtotal</i>				<i>317,690</i>		<i>540,073</i>
Outdoor Water Use (28% of Consumption)				<u>88,953</u>		<u>151,220</u>
Total Commercial				406,643		691,293
Residential						
1 bedroom	1,211	dwelling unit	120	145,320	204	247,044
2 bedroom	719	dwelling unit	160	115,040	272	195,568
3 bedroom	130	dwelling unit	200	<u>26,000</u>	340	<u>44,200</u>
<i>Subtotal</i>				<i>286,360</i>		<i>486,812</i>
Outdoor Water Use (18% of Consumption)				<u>51,545</u>		<u>87,626</u>
Total Residential				337,905		574,438
Parking^e	1,636	ksf	20	<u>32,720</u>	34	<u>55,624</u>
TOTAL - PARCELS Q, L and M-2, W-1/W-2				777,268		1,321,355
Streetscape	1	acres	3,650	3,650	8,030	8,030
Park						
Landscaped Areas ^f	14	acres	3,650	34,685	6,205	58,964
Restaurant ^d	10,000	square feet	900	9,000	1,530	15,300
Restrooms ^g	198	fixture units	100	<u>19,800</u>	170	<u>33,660</u>
Total Park				63,485		107,924
Total – Proposed Project with County Office Building Option				844,403		1,435,484

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses other than hotel rooms are expressed in terms of gpd per 1,000 square feet of floor area. (See Appendix 2, Table A2.1 for rate table)

^b Water consumption factors multiplied by the standard LADWP maximum daily peaking factor of 1.7. Subsequent to the issuance of LADWP's Water Supply Assessment, the number of hotel rooms was increased from 225 to 275 rooms. This increase of 50 rooms represents a corresponding increase in water demand that would account for 0.8% of the total overall water demand for the Project with County Office Building Option. This increase is considered negligible and does not change the conclusions reached by the Water Supply Assessment.

^d Based on approximately 33 square feet per seat and a consumption rate of 30 gpd per seat.

^e 325 square feet per parking space.

^f The 14 acres of landscaped areas within the park would generate a total water demand of 51,000 gpd and 86,870 gpd under average and peak day conditions, respectively. Thus, the water demand for the landscaped areas that are shown in the table are not of the Civic Center Mall's existing water demand of 16,415 gpd under an average day. Applying the 1.7 parking factor to this total yields a peak day water demand for the existing Civic Center Mall of 27,906 gpd.

^g Based on approximately 42 toilets and 24 sinks for new public restrooms in each of the three areas of the park.

Source: PCR Services Corporation, 2006.

degree of fire hazard.¹⁹⁴ Based on these factors, the Los Angeles Fire Department (LAFD) (requires flows ranging from 2,000 gpm from three adjacent fire hydrants flowing simultaneously in low-density residential areas to 12,000 gpm available to any city block in high-density commercial or industrial areas. High-density areas (i.e., high density commercial, principal business districts), in which simultaneous fires might occur, may require an additional 2,000 to 8,000 gpm above these standards.¹⁹⁵ Though 4,000 gpm from four adjacent hydrants is generally required for high density residential and commercial uses, the LAFD has determined fire flow required for the Project to be 12,000 gpm from eight fire hydrants flowing simultaneously. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system while the necessary gpm is flowing in order to be considered adequate by Fire Code standards.¹⁹⁶ As such, the Project would comply with LAFD specifications to satisfy fire flow requirements.

Based on LAFD fire flow requirements as well as pressure flow reports from the LADWP, no upgrades to the existing water system serving Parcels Q, M-2, and the Civic Park would be required. However, while the water lines serving Parcels W-1/W-2 and Parcel L each yield above the required 12,000 gpm for hydrant flow, Second Street would require fire coverage. As such, the installation of new water lines would be required along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L. New fire water meters would be provided with the new water connections to the existing LADWP water mains. Additional fire hydrants beyond those currently existing would also be necessary to satisfy fire suppression requirements. Laterals for fire hydrants or sprinkler service would be installed per LAFD specifications. Given the above, impacts associated with fire flow would be less than significant.

(2) Project with Additional Residential Development Option

In addition to the Project with County Office Building Option as proposed, an optional development scenario has been defined. The Project with Additional Residential Development Option provides for an additional 600 residential units in lieu of the 681,000 square feet of commercial office space proposed by the Project with County Office Building Option. All other components of the proposed Project are the same under the Project with Additional Residential Development Option.

¹⁹⁴ *Letter from Douglas Barry, Assistant Fire Marshal, LAFD Bureau of Fire Prevention and Public Safety, December 19, 2005.*

¹⁹⁵ *Fire Code of the Los Angeles Municipal Code, Section 57.09.06.*

¹⁹⁶ *Ibid.*

(a) Construction

For the purpose of analysis, it is anticipated that while the design of the residential structures may be markedly different than that of the offices under the proposed Project with County Office Building Option, overall the quantity of new construction (i.e., total square footage) would be substantially similar. As such, it is anticipated that the same amount and type of construction would occur and, subsequently, that similar short-term impacts would result. Such impacts, as in the case with the Project with County Office Building Option, would be less than significant, as water consumption associated with construction activities is not anticipated to cause a measurable increase in demand.

Similar to the Project with County Office Building Option, construction of the Project with Additional Residential Development Option with regard to modifications to the water conveyance system would be considered a secondary impact of the Project with Additional Residential Development Option, as it would obstruct vehicle and pedestrian access to the site. Incorporation of the mitigation measure discussed above regarding the implementation of a Traffic Management Plan would reduce impacts on traffic and pedestrian access to a less than significant level, as is the case with the proposed Project.

(b) Operation**(i) Water Use and Supply**

The difference in long-term water demand generated by the Project with Additional Residential Development Option, when compared to the Project with County Office Building Option, results from the difference in water consumption associated with the addition of 600 residential units in lieu of 681,000 square feet of office development. As shown in Table 83 on page 710, the operation of uses under this scenario is anticipated to have a net average potable water demand of 786,881 gpd at buildout, with a net peak demand of 1,337,696 gpd. Under the Project with Additional Residential Development Option, the Grand Avenue streetscape and the Civic Park would generate respective water demands equivalent to that of the Project with County Office Building Option.

Comparing the two development options, residential uses under the Project with Additional Residential Development Option would consume 97,940 gpd more than the residential uses under the Project. However, the Project with County Office Building Option's commercial uses would utilize 156,902 more gpd than the commercial uses under the Project with Additional Residential Development Option. Overall, the total water demand of the Project with Additional Residential Development Option represents a seven percent reduction

Table 83

Anticipated Water Demand – Project with Additional Residential Development Option

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
PARCELS Q, L and M-2, W-1/W-2						
Commercial						
Hotel ^c	275	room	130	35,750	221	60,775
Hotel meeting	15,000	square feet	800	12,000	1,360	20,400
Retail	307,000	square feet	80	24,560	136	41,752
Restaurant ^d	92,000	square feet	900	82,800	1,530	140,760
Health club	50,000	square feet	800	40,000	1,360	68,000
Office	0	square feet	180	<u>0</u>	306	<u>0</u>
<i>Subtotal</i>				<i>195,110</i>		<i>331,687</i>
Outdoor Water Use (28% of Consumption)				<u>54,631</u>		<u>92,872</u>
Total Commercial				249,741		424,559
Residential						
1 bedroom	1,565	dwelling unit	120	187,800	204	319,260
2 bedroom	936	dwelling unit	160	149,760	272	254,592
3 bedroom	159	dwelling unit	200	<u>31,800</u>	340	<u>54,060</u>
<i>Subtotal</i>				<i>369,360</i>		<i>627,912</i>
Outdoor Water Use (18% of Consumption)				<u>66,485</u>		<u>113,024</u>
Total Residential				435,845		740,936
Parking^e	1,708	ksf	20	<u>34,160</u>	34	<u>58,072</u>
TOTAL - PARCELS Q, L and M-2, W-1/W-2				719,746		1,223,567
Streetscape	1	acres	3,650	3,650	8,030	8,030
Park						
Landscaped Areas ^f	14	acres	3,650	34,685	6,205	58,964
Restaurant ^a	10,000	square feet	900	9,000	1,530	15,300
Restrooms ^g	198	fixture units	100	<u>19,800</u>	170	<u>33,660</u>
Total Park				63,485		107,924
Total – Project with Additional Residential Development Option				786,881		1,337,696

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses other than hotel rooms are expressed in terms of gpd per 1,000 square feet of floor area. (See Appendix 2, Table A2.1 for rate table)

^b Water consumption factors multiplied by the standard LADWP maximum daily peaking factor of 1.7. Subsequent to the issuance of LADWP's Water Supply Assessment, the number of hotel rooms was increased from 225 to 275 rooms. This increase of 50 rooms represents a corresponding increase in water demand that would account for 0.8% of the total overall water demand for the Project with County Office Building Option. This increase is considered negligible and does not change the conclusions reached by the Water Supply Assessment.

^d Based on approximately 33 square feet per seat and a consumption rate of 30 gpd per seat.

^e 325 square feet per parking space.

^f The 14 acres of landscaped areas within the park would generate a total water demand of 51,000 gpd and 86,870 gpd under average and peak day conditions, respectively. Thus, the water demand for the landscaped areas that are shown in the table are not of the Civic Center Mall's existing water demand of 16,415 gpd under an average day. Applying the 1.7 parking factor to this total yields a peak day water demand for the existing Civic Center Mall of 27,906 gpd.

^g Based on approximately 42 toilets and 24 sinks for new public restrooms in each of the three areas of the park.

Source: PCR Services Corporation, 2006.

when compared to that of the Project with County Office Building Option. Thus, impacts on water service for the Project with Additional Residential Development Option would be less than those of the Project. As the total estimated water demand for the Project with Additional Residential Development Option would neither exceed available supplies nor exceed available capacity within the distribution infrastructure and the Project with Additional Residential Development Option would consume less water, it is concluded that the Project with Additional Residential Development Option would also neither exceed available supplies during normal, single dry, and multiple dry water years during a 20-year horizon nor exceed available capacity within the distribution infrastructure. As such, impacts under the Project with Additional Residential Development Option would be less than significant.

(ii) Fire Flow

Given that the Project would comply with LAFD specifications to satisfy fire flow requirements, and the Project with Additional Residential Development Option would produce a smaller demand, the Project with Additional Residential Development Option would also comply with LAFD specifications for fire flow. As such, it is not anticipated that an expansion of the existing system or site-specific fire suppression improvements beyond that required for the Project with County Office Building Option would be necessary under the Project with Additional Residential Development Option. However, new fire water meters would be provided with new water connections to the existing LADWP water mains, and it is anticipated that additional fire hydrants beyond those currently existing would also be necessary to satisfy fire suppression requirements. Laterals for fire hydrants or sprinkler service would be installed per LAFD specifications. Given the above, as in the case of the Project with County Office Building Option, impacts associated with fire flow for the Project with Additional Residential Development Option would be less than significant.

4. CUMULATIVE IMPACTS

Section III.B of the Draft EIR identifies the related projects that are anticipated to be developed within the vicinity of the Project site.

As demonstrated above, the Project with Additional Residential Option would generate a water demand that is seven percent less than that of the Project with County Office Building Office. Therefore, the Project with Additional Residential Option in conjunction with the related projects would cumulatively consume less water than the Project with County Office Building Option plus related projects. As impacts on water supply are directly related to the quantity of water consumed or available in terms of live flow, this analysis focuses on the cumulative impacts of the Project with County Office Building Option in conjunction with the related projects. This approach is taken since this analysis would identify cumulative impacts that are

greater than those that would result from the combination of the Project with Additional Residential Development Option and the identified related projects. As the Project with Additional Residential Development Option would generate a water demand that is less but similar to the Project with County Office Building Option, it is conservatively concluded that the cumulative impacts of the Project with Additional Residential Development Option are the same as those analyzed below.

The water demand of the related projects, in conjunction with the Project with County Office Building Option, is shown in Table 84 on page 713. These related projects would cumulatively contribute, in conjunction with the Project with County Office Building Option, to the water demand in the Project area. The Project with County Office Building Option plus related projects would yield a total demand of approximately 7.7 million gpd, with a peak demand of 13.1 million gpd. Related projects are anticipated to be developed in compliance with State and water conservation regulations and within the build-out scenario of the Community Plans and the City of Los Angeles General Plan elements. As such, impacts associated with cumulative water demand would be less than significant.

As discussed earlier in Subsection 2.a., Regulatory Framework, LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing development within the City as well as projected growth anticipated to occur through redevelopment of existing uses and the development of new uses. LADWP's 2005 UWMP concludes that adequate water supplies are available.

As previously discussed, a Water Supply Assessment was prepared by LADWP for the Project. The assessment concludes that adequate water supplies would be available to meet the potable water demand for the Project with County Office Building Option and the Project with Additional Residential Development (See Appendix G of this Draft EIR). Given that the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through the related projects, and that the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects have been carefully considered relative to LADWP's ability to adequately meet future needs, it is anticipated that LADWP would be able to supply the demands of the Project with County Office Building Option and related projects through the foreseeable future and no significant impacts related to water demand are anticipated.

Table 84

Forecast of Cumulative Water Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
Commercial						
Retail	2,577,350	square feet	80	206,188	136	350,520
Office	11,677,301	square feet	180	2,101,914	306	3,573,254
Supermarket/Grocery	107,000	square feet	80	8,560	136	14,552
Restaurant/Bar ^c	400,097	square feet	900	360,087	1,530	612,148
Hotel	2,550	rooms	130	331,500	221	563,550
Theater	12,200	seats	4	48,800	6.8	82,960
Total Commercial				3,057,049		5,196,984
Residential^d						
Apartments	7,770	d.u.	160	1,243,200	272	2,113,440
Condominiums	9,414	d.u.	160	1,506,240	272	2,560,608
Live/Work Lofts	578	d.u.	80	46,240	136	78,608
Total Residential				2,795,680		4,752,656
Schools						
Kindergarten	380	students	8	3,040	13.6	5,168
Primary School	380	students	8	3,040	13.6	5,168
High School	6,019	students	12	72,228	20.4	122,788
Performing Arts School ^e	128,000	square feet	80	10,240	136	17,408
Total School				88,548		150,532
Child Care	45	children	8	360	13.6	612
Community Facilities						
Community Building	132,000	square feet	80	10,560	136	17,952
Museums	100,700	square feet	20	2,014	34	3,424
Library	12,500	square feet	80	1,000	136	1,700
Performing Arts Hall	37,500	square feet	80	3,000	136	5,100
Other	14,100	square feet	80	1,128	136	1,918
Total Community Facilities				17,702		30,093
Medical/Health Offices	84,075	square feet	250	21,019	425	35,732
Municipal/Civic Facilities						
Metro Jail	512	beds	85	43,520	144.5	73,984
Offices	2,940	employees	4	11,760	6.8	19,992
Courthouse with support offices, satellite library ^f	1,016,000	square feet	150	152,400	255	259,080
Total Municipal Facilities				207,680		353,056
Parking	11,516	stalls	20	227,320	34	386,444
Warehouse	640,000	square feet	20	12,800	34	21,760
Park	457,380	square feet	1	457,380	1.7	777,546
Total - Related Projects				6,885,538		11,705,415
Proposed Project				844,403		1,435,484
Total Cumulative Water Demand				7,729,941		13,140,899

Table 84 (Continued)

Forecast of Cumulative Water Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
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^a Calculations are based on rates provided by City of Los Angeles Bureau of Engineering. Development expressed in square footage is shown in terms of gpd per 1,000 square feet.

^b Factors multiplied by a maximum daily peaking factor of 1.7.

^c Based on approximately 33 square feet per seat and a consumption rate of 30 gpd per seat.

^d Gpd for apartments and condominiums assumes a conservative average of two bedrooms per unit.

^e Assumes 2,000 square feet for each of 64 classrooms.

Source: PCR Services Corporation

5. MITIGATION MEASURES

The proposed Project would have a significant impact with regard to the availability of water lines along Second Street with regard to Parcels W-1/W-2 and L. All other water-related impacts are less than significant. As such, a mitigation measure has been identified to address the one significant impact. In addition, a series of regulatory measures are identified that would result in reducing the water demand attributable to the Project.

Mitigation Measures

Mitigation Measure J.1-1: Prior to initial occupancy of the buildings within Parcels L and W-1/W-2, Related shall install new water lines along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L. The City's Building and Safety Department shall review and approve all plans related to these new water lines. Related shall be responsible for the implementation of these improvements.

a. Construction

Regulatory Measures

Regulatory Measure J.1-1: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall call DIG-ALERT to identify and mark on the

ground surface the locations of existing underground utilities. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.1-2: Prior to the start off each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall perform potholing of existing water and gas mains to verify the depth of cover. If the depth of cover over the lines is shallow and the total street pavement section is thick (around 24 inches), then the temporary cover over the lines during construction may be reduced to 12 inches or less. Under these circumstances, protective measures shall be implemented to prevent damage or breakage of the lines during the pavement sub-grade preparation process. Notices of service interruption, if necessary, shall be provided to customers in accordance with DWP-Water and ACG requirements. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.1-3: Prior to issuance of building permits for each construction phase, Related, with regard to the five development parcels, shall pay the appropriate fees as may be imposed by the City's Department of Building and Safety, or other appropriate City agency or department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements. Compliance with this measure shall be determined by the City's Department of Building and Safety, or other appropriate City agency or department.

Regulatory Measure J.1-4: Prior the issuance of building permits for each construction phase, Related, with regard to the five development parcels and the responsible parties for implementation of the Civic Park Plan under the applicable agreements, shall coordinate with the Los Angeles Department of Water and Power to conduct a flow test to confirm that the existing water system meets fire flow requirements imposed by the LAFD for the Project. Related, with regard to the five development parcels and the responsible parties for implementation of the Civic Park Plan under the applicable agreements, shall undertake and complete required improvements as identified by the LADWP, based on the findings of the flow test. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the

five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

b. Operations

Regulatory Measures

Regulatory Measure J.1-5: During Project operations, Related, with regard to the five development parcels, shall incorporate Phase I of the City of Los Angeles' Emergency Water Conservation Plan into all privately operated parcels. The Plan prohibits hose watering of driveways and associated walkways, mandates decorative fountains to use recycled water, mandates drinking water in restaurants to be served upon request only, and provides that water leaks are repaired in a timely manner. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure J.1-6: During Project operations, incorporate Los Angeles County water conservation policies into the operation of the Civic Park, and the County Office Building, if the Project proceeds with the County office building option. The responsible parties for the implementation of the Civic Park under the applicable agreements, and the County with regard to the County Office Building, if the Project proceeds with the County office building option, shall be responsible for implementing this measure. The implementation of this measure shall be subject to the review and approval of the County's CAO and/or Department of Public Works.

Regulatory Measure J.1-7: During Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements and the County Office Building operator shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.1-8: During Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall install automatic sprinkler systems to irrigate landscaping during morning

hours or during the evening to reduce water losses from evaporation, and sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The total estimated water demand for the Project with County Office Building Option or the Project with Additional Residential Development Option at build out is not expected to exceed available supplies during normal, single dry and multiple dry water years during a 20-year horizon, nor is it anticipated to exceed the available capacity within the distribution infrastructure that would serve the Project site. Other than connections from the Project site to the water mains and the installation of new water lines along Second Street, the construction of a new or upgraded distribution and conveyance infrastructure would not be required. With incorporation of mitigation measures discussed above, impacts to water supply associated with implementation of the Project would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. UTILITIES
2. WASTEWATER

1. INTRODUCTION

This section addresses the potential impacts of the proposed Project on local and regional wastewater facilities and infrastructure. The Project's consistency with adopted wastewater plans and policies is also addressed. The analysis estimates and compares the expected demand for service to the capacity of the existing collection, conveyance, and treatment facilities. The information contained herein is based on a technical report prepared by Psomas, dated June 5, 2006, and is included as Appendix G of this Draft EIR.

2. ENVIRONMENTAL SETTING

The City of Los Angeles Department of Public Works (LADPW), Bureau of Sanitation, is the wastewater collection and treatment agency serving the Project site, and regulates the acceptance of wastewater into the collection system.

In 1990, City Ordinance No. 166,060 (also known as the Sewer Allocation Ordinance) was adopted, which established regulations for projects that discharge into the Hyperion Treatment System (HTS). The ordinance established an annual sewage allotment of five million gallons per day (gpd), of which 34.5 percent (1,725,000 gpd) is allocated for priority projects, 8 percent (400,000 gpd) for public benefit projects, and 57.5 percent (2,875,000 gpd, with a monthly allotment of at least 239,583 gpd) for non-priority projects (of which 65 percent of this allocation is for residential projects and 35 percent to non-residential projects).

Before the Department of Building and Safety formally accepts a set of plans and specifications for a project for plan check, the LADPW must first determine if there is allotted sewer capacity available for the project. The LADPW will not make such a determination until the Department of Building and Safety has determined that the proposed Project's plans and specifications are acceptable for plan check. If the LADPW determines that there is allotted sewer capacity available for the project, then the Department of Building and Safety will accept the plans and specifications for plan check upon the payment of plan check fees. If a project is eligible to receive an allocation as a non-priority project, and the monthly allotment has been used, then the project is placed on a waiting list for the next month's allocation. At the request of the project applicant, the Department of Building and Safety will accept the project's plans

and specifications as acceptable for plan check even if the project has been placed on the waiting list and a sewer permit has not yet been obtained from LADPW, with the understanding that the project will not be able to connect to the City's wastewater system until capacity is available and a sewer permit issued.

City Ordinance No. 171,036, effective June 3, 1996, changed the rate structure for new and expanded development to be based upon the strength of the wastewater flow in addition to its volume. The determination of wastewater strength for each applicable project is based upon City guidelines for average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use.

As the Project site is currently used for parking, there is no sewer demand or service on any of the five parcels comprising the site, nor is there sewer demand for the existing Grand Avenue streetscape. The eight-acre portion for the existing Civic Center Mall bounded by Grand Avenue and Hill Street contains a small coffee shop. The plumbing fixtures within this coffee shop, which comprises four sinks and one toilet, generates approximately 1,200 gallons of wastewater per day.

The Project site is adjacent to existing public sanitary sewer mains in the streets. Parcel Q is bounded by a 12-inch main to the northwest along Upper Grand Avenue, a main to the northeast along First Street that increases from eight inches to ten inches, and a 12-inch main to the southeast along Olive Street.

Parcels W-1/W-2 are bounded by a 12-inch main to the northwest along Olive Street, a 10-inch line to the northeast along First Street, a 12-inch line to the southwest along Second Street, and eight-inch and 12-inch lines to the southeast along Hill Street.

Parcel L is bounded by a 12-inch line to the southwest of General Thaddeus Kosciuszko (GTK) Way and an eight-inch line to the southeast along Lower Grand Avenue. Parcel M-2 is bounded to the northeast by a 12-inch line in GTK Way and to the southeast by a 15-inch line in Lower Grand Avenue. The Civic Mall is bounded by an eight-inch sanitary sewer main along Temple Street to the northeast, a 12-inch sanitary sewer main to the southeast in Hill Street, and eight-inch and 15-inch sanitary sewer mains to the southwest along First Street.

Wastewater treatment would be provided by the Hyperion Treatment Plant (HTP), which is located near the coastline at the southern end of Playa Del Rey, directly south of the Los Angeles International Airport (LAX). The HTP has been improved to ensure capacity for the incremental increase in wastewater resulting from anticipated growth in the City of Los Angeles. Currently, the HTP treats more than 340 million gallons per day (mgd) and has an ultimate capacity of 450 mgd. The HTP treats wastewater from nearly the entire City of Los Angeles, as

well as surrounding cities including Beverly Hills, Burbank, Culver City, El Segundo, Glendale, San Fernando, and Santa Monica, and portions of unincorporated Los Angeles County.

3. PROJECT IMPACTS

a. Methodology

Wastewater generation estimates were developed for long-term operational use of the proposed Project to determine potential impacts of the respective Projects on wastewater treatment and conveyance facilities. For the purpose of this analysis, it is assumed that the Project comprises three components: the built structures proposed for the five parcels, the Grand Avenue streetscape, and the Civic Park.

To determine generation estimates for the built structures, factors from the Los Angeles Bureau of Engineering were multiplied by the Project's land uses provided in the Project Description, according to the proposed square footage for commercial, retail and office uses; the number of hotel rooms; the number of residential dwelling units; or Project facilities, as appropriate. To determine generation estimates for the streetscape, it is estimated that associated improvements would involve approximately one acre of landscaping.

Discussions are underway with regard to the final design of the Civic Park. As such, this analysis takes a conservative approach to forecasting anticipated sewer demand generated by the park. Specifically, it is estimated that there would be one restroom facility in each of the three areas of the park. Each of the three facilities would consist of 14 toilets and 8 sinks for an overall total of 42 toilets and 24 sinks in the park restrooms. Furthermore, it is assumed that a full-service, 10,000-square-foot restaurant could locate within the Civic Park.

It is anticipated that event pavilions and food-related kiosks could also locate within the park. In cases of special use occasions in which event pavilions would be utilized, it is anticipated that portable toilets would be provided specifically for each event by a private vendor and removed thereafter, should additional restroom facilities be warranted beyond those anticipated to be provided. As such, the event pavilions would not generate wastewater in excess of what is analyzed below. It is also assumed that no cooking would occur on site, and therefore no wastewater would be generated by the kiosks.

Given the above, sources of wastewater generated by the Civic Park would include the restrooms and a restaurant. When a final design is implemented, it is anticipated that its attributes would be addressed by the analysis contained in this Draft EIR.

b. Thresholds of Significance

Based on the factors set forth in the City of Los Angeles *CEQA Thresholds Guide* (1998), the proposed Project would have a significant impact on wastewater conveyance and treatment if:

- The Project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of the Hyperion Treatment Plant.
- The Project would cause 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.
- The construction of new or upgraded wastewater distribution infrastructure would result in a substantial obstruction of vehicle and/or pedestrian access.

c. Project Design Features

- The Related Companies shall comply with the procedural requirements of City ordinances regulating connections to the City sewer system (e.g., Ordinance No. 166,060).
- All necessary on-site infrastructure improvements shall be constructed to meet the requirements of the City's Department of Building and Safety.
- The Related Companies shall comply with the applicable provisions of City Ordinance No. 162,532, which provides for the reduction of water consumption levels, which in turn restricts wastewater flows. Water saving devices to be installed shall include low flow toilets and plumbing fixtures that prevent water loss.

d. Impact Analysis**(1) Proposed Project with County Office Building Option****(a) Construction**

During construction of the Project with County Office Building Option, a negligible amount of wastewater would be generated by construction personnel. It is anticipated that portable toilets would be provided and maintained by a private, contracted vendor during the construction phase of the Project, and that the vendor would dispose of waste off-site. Therefore,

wastewater generation from construction activities is not anticipated to cause 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. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of the HTP. Therefore, no significant impact to wastewater service is anticipated to occur during the construction phases of the Project with County Office Building Option.

Construction involving connections to the sewer mains adjacent to each development parcel could involve trenching, backfilling, and repaving of the affected roadways. Such construction could result in temporary street lane and sidewalk closures in the immediate area of the Project. Public detour routes would be established, as necessary, to divert traffic and pedestrians from the affected street segments. These detours would be temporary and limited in nature. Nonetheless, construction associated with modifications to the wastewater conveyance system would be considered a secondary impact, as it may obstruct vehicle and pedestrian access to the Project site. The analysis of Project impacts on traffic and circulation includes a discussion of construction impacts, and recommends a Traffic Management Plan as a mitigation measure. With incorporation of this mitigation, short-term impacts on traffic and pedestrian access would be less than significant. Given the above, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

(b) Operation

Development of the proposed Project with County Office Building Option would result in a long-term sewer service demand for operational uses of the Project with County Office Building Option. Sewer service demand would originate predominantly from commercial uses, including offices, restaurants, and health club locker rooms, as well as from residential uses. Table 85 on page 723 presents a breakdown of the proposed land uses of the Project with County Office Building Option and their corresponding estimated sewer flow calculations. As shown, based on the proposed land use mix, the Project with County Office Building Option at build out would generate a net total of approximately 631,650 gpd of wastewater, with a net peak rate of 1,073,805 gpd.

In addition to the commercial and residential uses proposed, it is anticipated that approximately three sets of public restrooms would be constructed within the Civic Park that would include roughly 198 fixtures, yielding an approximate total wastewater generation of 19,800 gpd. As discussed above in Section 3.a., Methodology, should additional restroom facilities be warranted in cases of special use occasions, it is anticipated that portable toilets would be provided specifically for each such event and removed thereafter. Additionally, it is considered a reasonable assumption that a restaurant of approximately 10,000 square feet could

Table 85

**Anticipated Sewer Demand
Proposed Project with County Office Building Option**

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total Consumption Rate (GPD) ^b	Peak Consumption Rate (GPD) ^b	Total (GPD)
PARCELS Q, L, M-2, W-1/W-2						
Commercial						
Hotel	275	room	130	35,750	221	60,775
Hotel meeting	15,000	square feet	800	12,000	1,360	20,400
Retail	307,000	square feet	80	24,560	136	41,752
Restaurant ^c	92,000	square feet	900	82,800	1,530	140,760
Health club	50,000	square feet	800	40,000	1,360	68,000
Office	681,000	square feet	180	<u>122,580</u>	306	<u>208,386</u>
Total Commercial				317,690		540,073
Residential						
1 bedroom	1,211	dwelling unit	120	145,320	204	247,044
2 bedroom	719	dwelling unit	160	115,040	272	195,568
3 bedroom	130	dwelling unit	200	<u>26,000</u>	340	<u>44,200</u>
Total Residential				286,360		486,812
TOTAL - PARCELS Q, L, M-2, W-1/W-2				604,050		1,026,885
PARK						
Restrooms	198 ^d	fixtures	100	19,800	170	33,660
Restaurant ^c	10,000	square feet	900	<u>7,800</u>	1,530	<u>13,260</u>
TOTAL - PARK				28,800		48,900
TOTAL - PROJECT WITH COUNTY OFFICE BUILDING OPTION				631,650		1,073,805

^a Calculations are based on rates provided by the City of Los Angeles, Department of Water and Power (LADWP). Consumption rates for commercial uses other than hotel rooms are expressed in terms of gpd per 1,000 square feet of floor area.

^b Factors multiplied by a maximum daily peaking factor of 1.7.

^c Based on approximately 33 square feet per seat and a consumption rate of 30 gpd per seat net of existing sewage generation within the park.

^d Based on approximately 42 toilets and 24 sinks for new public restrooms in each of the three areas of the park.

Source: PCR Services Corporation, 2006

locate within the Civic Park. It is anticipated that the restaurant would have a wastewater discharge of approximately 9,000 gpd.

Based on the locations of existing sewer main lines, it is anticipated that Parcels Q and W-1/W-2 would connect to the existing 12-inch sewer main in Olive Street. Parcel L is anticipated to connect to the eight-inch sewer main in Grand Avenue. Parcel M-2 is anticipated to connect to the 15-inch sewer main in Grand Avenue. The improvements proposed for the streetscape along Grand Avenue would not create land uses or facilities that would generate

wastewater; therefore, no connections would be warranted. The Civic Park is anticipated to connect to the existing 12-inch sewer main in Hill Street.

According to the *City of Los Angeles CEQA Thresholds Guide*, a sewer's capacity is considered constrained if the depth of flow is equal to or greater than three-quarters of the sewer's diameter. Table 86 on page 725 compares the capacities of each of the existing lines to the proposed generated demand by the Project with County Office Building Option. As shown, sufficient remaining capacity is available on all respective lines for each of the Parcels and the Civic Park. Therefore, the demand for sewer services would be adequately met by existing infrastructure.

With the exception of the new sewer connections that would tie in to the existing sewer main lines, as discussed in subsection 3.d(1), Construction, above, no upgrades to the existing infrastructure are anticipated. The new sewer connections would provide wastewater conveyance for the land uses proposed under the Project with County Office Building Option. With the inclusion of the sewer line tie-ins, the sewer infrastructure is concluded to be adequate to provide for the increase in wastewater service demand. Through compliance with City permitting processes, a sewer availability study would be prepared, as necessary, to confirm that there is sufficient remaining capacity in the local sewer lines that would service the Project site. In addition, to ensure that wastewater service demand is met, regulatory measures are identified below.

Regional wastewater facilities are at least partially funded through the collection of fees. The Sewerage Facilities Charge is collected by the City of Los Angeles from owners/developers of new land uses within the City. The Related Companies would be required to pay the Sewerage Facilities Charge for the proposed Project. In addition, all projects served by the HTP are subject to the Sewer Allocation Ordinance, which limits additional discharge according to a pre-established percentage rate. As previously discussed, before the Department of Building and Safety may formally accept a set of plans and specifications for a project, the LADPW is required to determine if there is available sewer capacity available for the project. By complying with the provisions of the Sewer Allocation Ordinance, this wastewater generation would not substantially or incrementally exceed the future scheduled capacity of the HTP. In addition, the Project with County Office Building Option would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or would cause a sewer's capacity to become constrained. Therefore, implementation of the Project with County Office Building Option would result in a less than significant impact.

Table 86

**Proposed Pipe Size Capacity Calculations For Project
with County Office Building Option**

Parcel ^c	Existing Line Diameter (inches)	Pipe Slope (FT/FT)	Allowable Capacity (cfs) ^a	Allowable Capacity (gpd) ^a	Proposed Demand (gpd) ^b	Existing Demand (gpd) ^e	Remaining Capacity (gpd)	Total Capacity ^g (%)
Q	12	0.013	1.59	1,027,600	240,210	240,000	547,400	23%
W-1/W-2	12	0.013	1.59	1,027,600	225,900	240,000	561,700	23%
L	8	0.01	0.60	390,400	68,970	100,000	221,400	22%
M-2	15	0.01	3.23	2,087,600	68,970	100,000	1,918,600	4%

Parcel	Existing Line Diameter (inches)	Pipe Slope (FT/FT)	Allowable Capacity (cfs) ^a	Allowable Capacity (gpd) ^a	Proposed Demand (gpd) ^b	Reduction in Capacity (%) ^f
Park	12 (Hill)	0.036	2.93	1,893,708	28,800	1.5
	10 (Broadway)	0.048	6.59	4,259,228	28,800	0.7

^a Allowable Capacity is equal to 1/2 the ultimate capacity of the pipe.

^b Generation factors from the City of Los Angeles Bureau of Engineering.

^c Parcels L and M-2 require equal sewer demand and would connect to sewer main in Grand Avenue. Parcels Q & W-1/W-2 to connect to sewer main in Olive Street.

^d Assumes 59% are 1-bedrooms, 36% are 2-bedrooms, and 5% are 3-bedrooms, similar to Project for Parcels W-1/W-2.

^e Existing Demand from Beleb Tamimi, Bureau of Sanitation / Wastewater Engineering Service Division on Jan 24, 2006.

^f Reduction in Capacity is equal to Proposed Demand divided by Allowable Capacity.

^g City of Los Angeles standard allows a capacity to 50% full.

Source: Psomas, Inc., 2006

(2) Project with Additional Residential Development Option

In addition to the Project with County Office Building Option as proposed, an optional residential development scenario has been defined. The Project with Additional Residential Development Option provides for an additional 600 residential units in lieu of the 681,000 square feet of commercial office space proposed by the Project with County Office Building Option. All other components of the proposed Project with County Office Building Option are the same under the Project with Additional Residential Development Option.

(a) Construction

For the purpose of analysis, it is anticipated that while the design of the residential structures may be markedly different than that of the offices proposed under the proposed Project with County Office Building Option, the overall quantity of new construction (i.e., total square footage) would be substantially similar. As such, it is anticipated that the same amount of

construction would occur and, subsequently, that similar short-term impacts would result. Such impacts, as also the case with the proposed Project with County Office Building Option, would be less than significant, as wastewater generation from construction activities is not anticipated to cause 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. Additionally, as is the case with the proposed Project with County Office Building Option, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of the HTP.

Similar to the proposed Project with County Office Building Option, construction of the Project with Additional Residential Development Option with regard to modifications to the wastewater conveyance system would be considered a secondary impact, as it may obstruct vehicle and pedestrian access to the site. Incorporation of the mitigation measure discussed above regarding the implementation of a Traffic Management Plan would reduce impacts on traffic and pedestrian access to a less than significant level, as is the case with the proposed Project with County Office Building Option.

(b) Operation

As discussed earlier, the difference in long-term sewer generation under the Project with Additional Residential Development Option when compared to the proposed Project with County Office Building Option, results from the addition of 600 residential units, in lieu of 681,000 square feet of office development. All of the other land uses included as part of the proposed Project with County Office Building Option would be developed under the Project with Additional Residential Development Option. As shown in Table 87 on page 727, the Project with Additional Residential Development Option would discharge a total of approximately 592,070 gpd, with a peak rate of 1,006,519 gpd. Comparing the two development options, residential uses under the Project with Additional Residential Development Option would generate 83,000 gpd more than the residential uses under the Project with County Office Building Option. However, the commercial uses under the Project with Additional Residential Development Option would discharge 122,580 gpd less than the commercial uses included in the proposed Project with County Office Building Option. As stated earlier, the streetscape improvements along Grand Avenue would not include land uses or facilities that would generate wastewater. Restrooms within the Civic Park would generate an equivalent amount of wastewater under the Project with Additional Residential Development Option as occurs under the proposed Project with County Office Building Option.

Overall, the total generation of wastewater produced by the Project with Additional Residential Development Option represents nearly seven percent less sewage generation than that of the proposed Project with County Office Building Option. Therefore, the wastewater produced by the Project with Additional Residential Development Option would have less of an

Table 87

**Anticipated Sewer Demand
Proposed Additional Residential Development Option**

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
PARCELS Q, L, M-2, W-1/W-2						
Commercial						
Hotel	275	room	130	35,750	221	60,775
Hotel meeting	15,000	square feet	800	12,000	1,360	20,400
Retail	307,000	square feet	80	24,560	136	41,752
Restaurant ^c	92,000	square feet	900	82,800	1,530	140,760
Health club	50,000	square feet	800	<u>40,000</u>	1,360	<u>68,000</u>
Total Commercial				195,110		331,687
Residential						
1 bedroom	1,565	dwelling unit	120	187,800	204	319,260
2 bedroom	936	dwelling unit	160	149,760	272	254,592
3 bedroom	159	dwelling unit	200	<u>31,800</u>	340	<u>54,060</u>
Total Residential				369,360		627,912
TOTAL - PARCELS Q, L and M-2, W-1/W-2				564,470		959,599
PARK						
Restrooms ^d	198	fixtures	100	<u>19,800</u>	170	<u>33,660</u>
Restaurant ^c	10,000	square feet	900	7,800	1,530	13,260
TOTAL - PARK				28,800		48,960
TOTAL – PROJECT WITH ADDITIONAL RESIDENTIAL DEVELOPMENT OPTION				592,070		1,006,519

^a Calculations are based on rates provided by the City of Los Angeles, Department of Water and Power (LADWP). Consumption rates for commercial uses other than hotel rooms are expressed in terms of gpd per 1,000 square feet of floor area.

^b Factors multiplied by a maximum daily peaking factor of 1.7.

^c Based on approximately 33 square feet per seat and a consumption rate of 30 gpd per seat net of existing sewage generation within the park.

^d Based on approximately 42 toilets and 24 sinks for new public restrooms in each of the three areas of the park.

Source: PCR Services Corporation, 2006

impact than the proposed Project with County Office Building Option and thus result in greater remaining capacity on the sewer lines serving Parcels W-1/W-2, as shown in Table 88 on page 729. Given the above, the impacts on sewer service for the Project with Additional Residential Development Option would be less than those of the Project with County Office Building Option. As such, implementation of the Project with Additional Residential Development Option would, as with the proposed Project with County Office Building Option, result in a less than significant impact on wastewater collection, conveyance, and treatment facilities.

4. CUMULATIVE IMPACTS

Section III.B of the Draft EIR identifies the related projects that are anticipated to be developed within the vicinity of the Project site.

As demonstrated above, the Project with Additional Residential Option would generate nearly seven percent less wastewater than that of the proposed Project with County Office Building Option. Therefore, the Project with Additional Residential Option in conjunction with the related projects would cumulatively generate less wastewater than the proposed Project with County Office Building Option plus related projects. As impacts on wastewater are directly related to the quantity of sewage flows, this analysis focuses on the cumulative impacts of the proposed Project with County Office Building Option in conjunction with the related projects. This approach is taken since this analysis would identify cumulative impacts that are greater than those that would result from the combination of the Project with Additional Residential Development Option and the identified related projects. As the Project with Additional Residential Development Option would generate sewage flows that are less but similar to the proposed Project with County Office Building Option, it is conservatively concluded that the cumulative impacts of the Project with Additional Residential Development Option are the same as those analyzed below.

The wastewater anticipated to be discharged by the related projects along with the proposed Project with County Office Building Option, is shown in Table 89 on page 730. These related projects would cumulatively contribute, in conjunction with the proposed Project with County Office Building Option, to the generation of wastewater in the Project area.

As discussed earlier, the HTP treats more than 340 mgd and has an ultimate capacity of 450 mgd. Table 89 shows that the increase in wastewater associated with the related projects in addition to the Project is approximately 6.0 million gpd, which represents approximately 1.3 percent of the HTP's full capacity. Each of the individual projects would be subject to the LADWP's determination of whether there is allotted sewer capacity available prior to the formal acceptance of plans and specifications by the Department of Building and Safety. Consequently, cumulative impacts to the local and regional sewer system under the proposed Project with County Office Building Option or the Project with Additional Residential Development Option, in conjunction with the identified related projects, would be less than significant.

Table 88

**Proposed Pipe Size Capacity For Project
with Additional Residential Development Option**

Parcel	Existing Line Diameter (inches)	Pipe Slope (FT/FT)	Allowable Capacity (cfs) ^a	Allowable Capacity (gpd) ^a	Proposed Demand (gpd) ^b	Existing Demand (gpd) ^e	Remaining Capacity (gpd)	Total Capacity ^g (%)
Q	12	0.013	1.59	1,027,600	240,210	240,000	547,400	23%
W-1/W-2 ^d	12	0.013	1.59	1,027,600	186,320	240,000	601,300	21%
L	8	0.01	0.60	390,400	68,970	100,000	221,400	22%
M-2	15	0.01	3.23	2,087,600	68,970	100,000	1,918,600	4%

Parcel	Existing Line Diameter (inches)	Pipe Slope (FT/FT)	Allowable Capacity (cfs) ^a	Allowable Capacity (gpd) ^a	Proposed Demand (gpd) ^b	Reduction in Capacity (%) ^f
Park	12 (Hill)	0.036	2.93	1,893,708	28,800	1.5
	10 (Broadway)	0.048	6.59	4,259,228	28,800	0.7

^a Allowable Capacity is equal to 1/2 the ultimate capacity of the pipe.

^b Generation factors from the City of Los Angeles Bureau of Engineering.

^c Parcels L and M-2 require equal sewer demand and would connect to sewer main in Grand Avenue. Parcels Q & W-1/W-2 to connect to sewer main in Olive Street.

^d Assumes 59% are 1-bedrooms, 36% are 2-bedrooms, and 5% are 3-bedrooms, similar to Project for Parcels W-1/W-2.

^e Existing Demand from Bebel Tamimi, Bureau of Sanitation / Wastewater Engineering Service Division on Jan 24, 2006.

^f Reduction in Capacity is equal to Proposed Demand divided by Allowable Capacity.

^g City of Los Angeles standard allows a capacity to 50% full.

Source: Psomas, Inc., 2006

5. MITIGATION MEASURES

The proposed Project would have less than significant impacts with regard to wastewater service. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure J.2-1: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park shall comply with City ordinances limiting connections to the City sewer system, in accordance with City Bureau of Sanitation procedures. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with

Table 89

Forecast of Cumulative Wastewater Generation

Use Type	Amount of Development	Units	Daily Average Rate (GPD) ^a	Total Average Sewer Demand (GPD)	Peak Rate (GPD) ^b	Total Peak Sewer Demand (GPD)
Commercial						
Retail	2,577,350	square feet	80	206,188	136	350,520
Office	11,677,301	square feet	180	2,101,914	306	3,573,254
Supermarket/Grocery	107,000	square feet	80	8,560	136	14,552
Restaurant/Bar ^c	400,097	square feet	900	360,087	1530	612,148
Hotel	2,550	rooms	130	331,500	221	563,550
Theater	12,200	seats	4	48,800	6.8	82,960
Total Commercial				3,057,049		5,196,984
Residential^d						
Apartments	7,770	d.u.	160	1,243,200	272	2,113,440
Condominiums	9,414	d.u.	160	1,506,240	272	2,560,608
Live/Work Lofts	578	d.u.	80	46,240	136	78,608
Total Residential				2,795,680		4,752,656
Schools						
Kindergarten	380	students	8	3,040	13.6	5,168
Primary School	380	students	8	3,040	13.6	5,168
High School	6,019	students	12	72,228	20.4	122,788
Performing Arts School ^e	128,000	square feet	80	10,240	136	17,408
Total School				88,548		150,532
Child Care	45	children	8	360	13.6	612
Community Facilities						
Community Building	132,000	square feet	80	10,560	136	17,952
Museums	100,700	square feet	20	2,014	34	3,424
Library	12,500	square feet	80	1,000	136	1,700
Performing Arts Hall	37,500	square feet	80	3,000	136	5,100
Other	14,100	square feet	80	1,128	136	1,918
Total Community Facilities				17,702		30,093
Medical/Health Offices	84,075	square feet	250	21,019	425	35,732
Municipal/Civic Facilities						
Metro Jail	512	beds	85	43,520	144.5	73,984
Offices	2,940	employees	4	11,760	6.8	19,992
Courthouse with support offices, satellite library, and 150 parking spaces	1,016,000	square feet	150	152,400	255	259,080
Total Municipal Facilities				207,680		353,056
Warehouse	640,000	square feet	20	12,800	34	21,760
Park	457,380	square feet	1	457,380	1.7	777,546
Total - Related Projects				6,658,218		11,318,971
Proposed Project With County Office Building Option				631,650		1,006,519
Total Cumulative Wastewater Generation				7,289,868		12,325,490

Table 89 (Continued)

Forecast of Cumulative Wastewater Generation

Use Type	Amount of Development	Units	Daily Average Rate (GPD) ^a	Total Average Sewer Demand (GPD)	Peak Rate (GPD) ^b	Total Peak Sewer Demand (GPD)
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^a Calculations are based on rates provided by City of Los Angeles Bureau of Engineering. Development expressed in square footage is shown in terms of gpd per 1,000 square feet.

^b Factors multiplied by a maximum daily peaking factor of 1.7.

^c Based on approximately 33 square feet per seat and a consumption rate of 30 gpd per seat.

^d Gpd for apartments and condominiums assumes a conservative average of two bedrooms per unit.

^e Assumes 2,000 square feet for each of 64 classrooms.

Source: PCR Services Corporation, 2006.

this measure with regard to the five development parcels. The County's CAO and/or Department of Public Works shall ensure compliance with this measure.

Regulatory Measure J.2-2: Prior to the start of each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park Plan, shall prepare, and thereafter implement, building plan specifications for the installation of low-flow water fixtures and further encourage reduction of water consumption to minimize wastewater flow to the sewer system, in accordance with applicable water conservation requirements. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO and/or Department of Public Works shall ensure compliance with this measure.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the recommended mitigation measures discussed above, any local deficiencies in sewer lines would be identified and remedied and wastewater generation rates would be reduced. As such, less than significant impacts on wastewater conveyances or the capacity of the HTP would occur.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. UTILITIES
3. SOLID WASTE

1. INTRODUCTION

This section addresses potential impacts of the proposed Project on solid waste facilities, service systems, and regulations. This section describes the City and County solid waste collection services and disposal facilities that would serve the Project Site, as well as the regulatory measures intended to minimize the volume of solid waste requiring landfill disposal, such as relevant State legislation and City/County recycling programs. This section also estimates the amount of solid waste generated daily by the proposed Project at buildout and evaluates the impacts of solid waste generation by the proposed Project on existing solid waste collection and disposal facilities that serve the City.

2. ENVIRONMENTAL SETTING

a. Regulatory Setting

The California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, identify programs local jurisdictions must implement to achieve specific solid waste disposal reduction goals and requires each development project to provide an adequate storage area for collection and removal of recyclable materials.

The Los Angeles County Solid Waste Management Action Plan is a comprehensive solid waste management study and implements a regional approach to managing solid waste, incorporating source reduction, recycling, and composting programs along with public education awareness programs. The Action Plan recognizes that landfills will remain an integral part of the County's solid waste management system for the foreseeable future, providing for 15 years of disposal capacity on a countywide basis. The Action Plan reaffirms the policy of managing solid waste in Los Angeles County through a reasonable balance of public and private operations and facilities, including a regional public/private landfill system. This policy, combined with sufficient daily disposal capacity, relies on competitive market forces rather than government action to regulate waste flow.

The City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) is the long-range solid waste management policy plan for the City, while the Source Reduction and Recycling Element (SRRE) is the strategic action policy plan for diverting solid waste from landfills. The objective of the CiSWMPP is to reduce at the source or recycle a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter. The CiSWMPP calls for the disposal of the remaining waste in local and possibly remote landfills. The CiSWMPP establishes citywide diversion objectives of 70 percent by 2020. The CiSWMPP provides direction for the solid waste management hierarchy and integrates into all facets of solid waste management planning. It ensures that disposal practices do not conflict with diversion goals. It also serves as an umbrella document for the City's SRRE as well as other Citywide solid waste management planning activities.

The following five goals of the CiSWMPP reflect the importance of source and materials recovery to the success of the plan and, therefore, the intent of the City to follow state regulations:

- **Maximum Waste Diversion:** The goal is to create an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes waste requiring disposal.
- **Adequate Recycling Facility Development:** To expand the siting of facilities that enhance waste reduction, recycling, and composting throughout the City beyond the current limits of the zoning code in ways that are economically, socially, and politically acceptable.
- **Adequate Collection, Transfer, and Disposal of Mixed Solid Waste:** The City shall ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed in a manner that minimizes adverse environmental impacts.
- **To develop an environmentally sound solid waste management system that protects public health and safety, protects natural resources, and utilizes the best available technology to accommodate the needs of the City.**
- **The City shall operate a cost-effective integrated waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs.**

The General Plan Framework Element (Element) is a strategy for long-term growth that sets a Citywide context to guide the update of the community plans and citywide elements. The Element responds to State and Federal mandates to plan for the future. In planning for the

future, the City of Los Angeles uses population forecasts provided by the Southern California Association of Governments (SCAG). The Element addresses many programs the City has implemented to divert waste from disposal facilities. These include source reduction programs such as home composting, recycling programs such as the Curbside Recycling Program, and composting programs. The Element suggests that for these programs to succeed, the City should site businesses at appropriate locations within its borders that handle, process, and/or manufacture recyclable commodities to allow a full circle recycling system to develop. It also discusses how Recycling Market Development Zones and other development zone areas should be utilized to bring these beneficial businesses into Los Angeles, and suggests that development and support of recyclable materials markets is one of the City's challenges in the years ahead. The Element addresses the means for dealing with the solid waste remaining after diversion, for which the City will have a continuing need for solid waste transfer and disposal facilities. It states that the capacity of the landfills located in Los Angeles is very limited, and that more transfer facilities will be needed to transfer waste from the collection vehicles and transport it to other, more remote landfill facilities. The Element acknowledges that capacity must be provided for the waste collected by both City agencies and private collection companies and identifies several landfill disposal facilities that may be accessed by truck. The Element also identifies other landfill disposal facilities that would require the City to ship its solid waste by train.

Solid waste recycling within the City of Los Angeles is also addressed through provisions set forth in various sections of the Los Angeles Municipal Code (LAMC) which were enacted under the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687, August 13, 1997). The Ordinance in addition to setting forth standards for the location and operating characteristics of recycling centers and processing facilities also sets forth the requirements for the inclusion of recycling areas within individual development projects.

b. Existing Conditions

With respect to the Project site, most of the site currently serves as a paved surface parking lot in an urban and developed area of the City. Under the existing use, solid waste is minimal. When the Project site is developed, demolition debris would consist primarily of asphalt paving. Any hazardous debris materials would be classified and disposed of accordingly. Such debris is expected to be very limited, if it occurs at all.

c. Disposal Locations

The great majority of municipal solid waste disposed of in Los Angeles County is disposed at Class III landfills (Municipal Solid Waste Landfills), which are facilities for non-hazardous, household waste. Unclassified (Inert) Landfills are defined as facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. The City

of Los Angeles does not own or operate any landfill facilities. As such, all solid waste generated within the City is disposed of at privately-owned landfill facilities.

Remaining landfill capacity within facilities located within Los Angeles County are declining and as a result there continues to be a shortage of solid waste disposal capacity within Los Angeles County itself. As a result, the solid waste disposal needs of the County are increasingly being met by landfill facilities located outside of Los Angeles County. Based on data for 2003, over 20% of the County's solid waste disposal needs were met by landfill facilities located outside of the County of Los Angeles. Due to the difficulties of establishing new landfills or expanding existing landfills, it is forecasted that increasing amounts of the County's solid waste disposal will occur at out-of-County landfills in the future. In order to meet the solid waste disposal needs of Los Angeles County over the next 15 years, the amount of out-of-County disposal will need to increase three- to five-fold over current out-of-County disposal rates. Notwithstanding, as of January 2003, Sunshine Canyon Landfill received planning approval to operate a new, 55-million-ton capacity expansion within the City of Los Angeles. On May 13, 2003, the California Integrated Waste Management Board approved a permit for the initial phase of the expansion project that increases the disposal area by 84 acres with a new capacity of 7.53 million tons.

Available inert landfills include the following: Azusa Land Reclamation, NU-Way Live Oak Landfill, Peck Road Gravel Pit and Reliance Pit #2. According to the County's 2003 Annual Report, as of December 31, 2003, the total remaining permitted inert waste capacity in Los Angeles County was estimated to be approximately 69.94 million tons. Based on the average 2003 disposal rate of 1.2 million tons per year, this capacity would be exhausted in approximately 60 years (i.e., around 2065). Based on this data, it is concluded that there is no anticipated shortfall in disposal capacity for inert waste within the County.

3. IMPACT ANALYSIS

a. Methodology

The analysis of the impacts on solid waste disposal estimates the amount of solid waste that would be generated by the Project, and compares that amount to the available disposal capacity of the waste disposal facilities that serve the City of Los Angeles. It also evaluates the Project's capacity to comply with the City's diversion and recycling goals. The analysis addresses both the Project's disposal of inert demolition materials (e.g., asphalt paving) during the construction phase, and the disposal of solid waste that would be generated during Project operations due to the Project's residential and commercial uses as well as the Civic Park. The estimates of solid waste generation are based on construction waste generation factors that are

prepared by EPA, and operations generation factors that are found in the CIWMB Solid Waste Characterization Database.

b. Thresholds of Significance

Based on the criteria set forth in the City of Los Angeles CEQA Thresholds Guide, the proposed Project would have a significant impact if:

- The Project generates solid waste at a level that exceeds the available capacity of the existing and/or planned landfills.
- The Project conflicts with diversion and recycling goals set forth in the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) and Source Reduction and Recycling Element (SRRE).

c. Project Impacts

(1) Project with County Office Building Option

(a) Construction

Construction and demolition debris would be generated during the construction of the proposed Project. As all five Development Parcels are currently paved with surface parking, construction debris would consist primarily of asphalt paving. The installation of water and sewer lines would generate related construction debris. However, as the Project site is essentially undeveloped, no structures of any note would be demolished during Project construction. Solid waste associated with construction activities would be disposed of at an unclassified landfill accepting inert waste.

The calculations of construction debris are based on an average of 4.02 pounds of construction debris per square foot of commercial construction and 4.38 pounds of construction debris per square foot of residential construction.¹⁹⁹ Construction of the approximately 1,360,000 square feet of commercial development under the Project with County Office Building Option would generate approximately 2,800 tons of construction debris. It is estimated that the 2,060 multifamily residential units under this Option would comprise approximately 2,240,000 square feet, which has been used to assess the amount of solid waste that would be generated by

¹⁹⁹ U.S. EPA, *Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.*

construction of this portion of the Project. Thus, construction of the residential component of the Project with County Office Building Option would generate approximately 5,000 tons of construction debris. In addition, debris may be created due to removal of pavement material for the Civic Park and Grand Avenue Streetscape Plan. Using, extremely conservative assumptions, it is estimated that up to 16 acres for the Civic Park and 2 acres for the Grand Avenue streetscape improvements would be affected to a depth of 6 inches. If such a volume of pavement were removed, the waste generation at 1.6 tons per cubic yard would be approximately 23,300 tons. Construction of a potential restaurant within the Civic Park of 10,000 square feet would generate another 20 tons of debris. Assuming that no construction debris would be recycled, construction of the Project with County Office Building Option would generate a total of roughly 31,120 tons of solid waste. With implementation the City's mandatory Construction and Demolition Debris Recycling Program, a minimum of 50 percent of the Project-generated construction waste would be diverted, and thus, not be disposed of at landfill facilities. With the implementation of the City's Construction and Demolition Debris Recycling Program, the total amount of construction debris disposed of at a landfill would be on the order of 15,560 tons.

As described above, the total remaining permitted inert waste capacity in Los Angeles County is estimated to be approximately 69.94 million tons. Based on the average 2003 disposal rate of 1.2 million tons per year, this capacity would be exhausted in approximately 60 years (i.e., around 2065). Based on this data, it is concluded that there is no anticipated shortfall in disposal capacity for inert waste; and impacts of the Project with County Office Building Option on solid waste due to construction activities would be less than significant.

(b) Operation

Proposed Project operations would generate municipal solid waste from the variety of residential and commercial uses anticipated on the Project site, as well as activities within the Civic Park. The estimated amount of solid waste that these uses would generate is based on solid waste disposal rates that are set forth in the CIWMB Solid Waste Characterization Database. The estimated amount of solid waste that would be disposed of during operations of the Project with County Office Building Option is presented in Table 90 on page 738.

Residential waste disposal rates reflect the amount (tons) of solid waste disposal generated per dwelling unit on an annual basis. The statewide waste disposal rate for multifamily residential units is 0.46 tons per unit per year. As 2,060 units would be constructed, approximately 948 tons of solid waste that requires disposal at a landfill accepting municipal waste would be generated yearly by the residential portion of the Project with County Office Building Option. Waste disposal rates for the business types anticipated to occur at the Project site are calculated according to the amount (tons) of waste that an employee generates on an annual basis that is anticipated to be disposed of at a landfill that accepts municipal waste. Based on the amount and types of proposed development, the commercial component would require the

Table 90

Anticipated Solid Waste – Project with County Office Building Option

Use Type	Amount of Development	Units	Employees ^b	Disposal Rate (tons/employee/year) ^a	Total (tons/year)
Commercial					
Hotel	275	room	248	2.10	521
Hotel Meeting Space	15,000	square feet	30	1.9	57
Retail	307,000	square feet	614	0.30	184
Restaurant	92,000	square feet	184	3.10	570
Health club	50,000	square feet	100	0.90	90
County Office Bldg	681,000	square feet	2,724	1.70	<u>4,631</u>
Total Commercial					6,053
Residential	2,060	dwelling unit		0.46	948
Park	16	acres	10	0.90	9
Park Restaurant	10,000	square feet	20	3.10	62
Total – Proposed Project					7,072

^a Disposal Waste rate calculations are based on CIWMB published units.

^b Derived from factors generated by PCR Services Corporation based on data presented in the Institute of Transportation Engineers, Trip Generation Manual.

Source: PCR Services Corporation

disposal of 6,053 tons of solid waste per year. In addition, it is estimated that the uses within the Civic Park would generate approximately 9 tons of waste per year, based on a waste disposal factor for parks of 0.90 tons per employee per year, and an additional 62 tons per year attributable to the potential restaurant that may locate within the Civic Park. Thus, the total of all operations would require the disposal of approximately 7,072 tons of solid waste per year.

The City of Los Angeles currently does not own or operate any landfill facilities. Whereas in the past solid waste disposal occurred solely within landfills located in Los Angeles County, the trend in recent years is an increase in solid waste disposal at landfills located outside the County of Los Angeles. For example, in 2003 approximately 20 percent of the solid waste generated within Los Angeles County was disposed of at landfill facilities located outside of Los Angeles County.²⁰⁰ Furthermore, the County of Los Angeles in its 2003 Annual Report to the

²⁰⁰ County of Los Angeles, Department of Public Works, 2003 Annual Report Presentation, page 11.

Los Angeles County Integrated Waste Management Plan (the “2003 Annual Report”), concludes that the use of out-of-County landfills will increase in the future given the difficulties associated with permitting new or expanded landfill facilities within the County itself. As such, the proper current context within which to view the Project’s potential solid waste impacts is total disposal capacity which consists of landfills located within, as well as outside of, Los Angeles County.

The Los Angeles County Integrated Waste Management Plan, inclusive of its annual reports, serve as the primary planning documents for the County’s waste disposal needs, which includes solid waste generated throughout the City of Los Angeles. The 2003 Annual Report (the most recent available report), forecasts conditions over a 15-year planning horizon. With each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time to address any future shortfalls in landfill capacity. The 2003 Annual Report clearly concludes that there is enough capacity within permitted solid waste facilities (i.e., landfills) to serve Los Angeles County through the 15-year planning period of 2003–2018. The 2003 Annual Report specifically states that “the County of Los Angeles will protect the health and safety of all residents in the County by ensuring that solid waste disposal service, an essential public service, is provided without interruption through the 15-year planning period and in the long term”.

Furthermore, the Los Angeles County Department of Public Works and the County Integrated Waste Management Task Force submitted the first Five-Year Review Report for the Countywide Integrated Waste Management Plan in June 2004 (the latest available report). The Five-Year Review Report was approved by the California Integrated Waste Management Board in September 2004. The February 2, 2004, transmittal letter for this report states that the “updated disposal capacity need analysis demonstrates that the County of Los Angeles meet the disposal capacity requirements of AB 939 by successfully permitting and developing all in-county landfill expansions, by more extensively utilizing out-of-County disposal capacity, and developing facilities utilizing conversion technologies to the extent technically feasible” (February 2, 2004, letter, page 1). The Five-Year Review Report states that the “remaining landfill capacity and the rate of depletion of that capacity give an indication of the ability of jurisdictions in the County to meet the solid waste disposal needs of their residents and businesses, thereby protecting public health and safety and the environment” (Five-Year Review Report, page 63). This report repeats the conclusion of the 2003 Annual Report that “the County continues to have adequate disposal capacity (i.e., greater than 15 years)” (Five-Year Review Report, page 65). The Five-Year Review Report’s conclusions are based in part upon a survey of all cities within the County regarding their disposal rates and waste diversion programs.

The maximum estimated increase in waste disposal from the Project with County Office Building Option, 7,072 tons per year, would constitute less than 0.001 percent of the 9.11 million tons of total solid waste (before diversion) generated within the City of Los Angeles annually and disposed of daily at major landfills in the region. The amount of Project-related waste

disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the Project, per compliance with the City's recycling and diversion goals. Mitigation measures are included below to ensure that support of related programs, and compliance with the City's SRRE, CiSWMPP, the General Plan Framework Element and the Curbside Recycling Program would occur. Waste generated by the Project would not exacerbate the existing shortfall of landfill capacity to the point of altering the projected timeline for landfills within the region to reach capacity. The available capacity of the existing and/or planned landfills would not be exceeded and impacts on solid waste disposal from Project operations would be less than significant.

(2) Project with Additional Residential Development Option

(a) Construction

Construction of the approximately 764,000 square feet of commercial development under the Project with Additional Residential Development Option would generate approximately 1,600 tons of construction debris. Development of the 2,660 multifamily residential units, with an estimate of 2,836,000 square feet, would generate approximately 6,200 tons of construction debris. As is the case with the Project with County Office Building Option, debris associated with the removal of pavement material for the Civic Park and the Grand Avenue streetscape improvements, and a potential restaurant within the Civic Park is estimated to be 23,320 tons. Assuming that no construction debris would be recycled, construction of the Additional Residential Development Option would generate a total of roughly 31,120 tons of solid waste. With implementation of the City's mandatory Construction and Demolition Debris Recycling Program, a minimum of 50 percent of the Project-generated construction waste would be diverted, and thus, not be disposed of at landfill facilities. With the implementation of the City's Construction and Demolition Debris Recycling Program, the actual total amount of construction debris disposed of at a landfill would be on the order of 15,560 tons. This is the same as that associated with the Project with County Office Building Option; and the construction debris from the Project with Additional Residential Development Option would comprise an extremely small percentage of the remaining inert landfill capacity, which is expected to be available for 60 years, based on 2003 average disposal rates. Thus, impacts from construction debris would be less than significant.

(b) Operation

The estimated solid waste disposal from the Project with Additional Residential Development Option is shown in Table 91 on page 741. As indicated, the 2,660 units that would be constructed would generate approximately 1,224 tons of solid waste that requires disposal at a landfill. Based on the amount and types of proposed development, the commercial component under this Option would require the disposal of 1,422 tons of solid waste per year. In addition,

Table 91

Anticipated Solid Waste – Project with Additional Residential Development Option

	Amount of Development	Units	Employees ^b	Disposal Rate (tons/employee/year) ^a	Total (tons/year)
Commercial					
Hotel	275	room	248	2.10	521
Hotel Meeting Space	15,000	square feet	30	1.9	57
Retail	307,000	square feet	614	0.30	184
Restaurant	92,000	square feet	184	3.10	570
Health club	50,000	square feet	100	0.90	90
Total Commercial					1,422
Residential	2,660	dwelling unit		0.46	1,224
Park	16	acres	10	0.90	9
Park Restaurant	10,000	square feet	20	3.10	62
Total – Additional Residential Development Option					2,717

^a Disposal Waste rate calculations are based on CIWMB published units.

^b Derived from factors generated by PCR Services Corporation based on data presented in the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition, 1997.

Source: PCR Services Corporation

there would be 9 tons per year associated with park uses, and an additional 62 tons per year with a potential restaurant within the Civic Park. Thus, operations associated with the Project with Additional Residential Development Option would require the disposal of approximately 2,717 tons of solid waste per year; 4,355 tons less than the Project with County Office Building Option. As is the case with that Option, impacts on solid waste due to operations of the Project with Additional Residential Development Option would be less than significant.

4. CUMULATIVE IMPACTS

Development of the identified 93 related projects would generate solid waste during their respective construction periods, and on an on-going basis following the completion of construction.

The calculation of the construction debris from the residential related projects uses the same generation factor as used for the Project, 4.38 pounds per square foot, and assumes that the residential floor areas per unit would be similar to those of the Project. Using these assumptions, the related residential projects would generate approximately 42,300 tons of construction debris. When added to the 5,000 tons of debris with the Project with County Office Building Option, the total is approximately 47,300 tons. The construction debris from the non-residential related projects is assumed to generate the same amount of debris that was used to calculate the debris from the Project, 4.02 pounds per square foot. It is estimated that the non-residential related projects would amount to approximately 26,500,000 square feet, and the total debris from their construction would be approximately 53,300 tons. When combined with the non-residential construction debris of 26,120 tons with the Project with County Office Building Option, the total non-residential debris from construction is approximately 79,420 tons. The total construction debris from residential and non-residential development would be approximately 127,000 tons, prior to recycling and diversion. In comparison to a remaining inert landfill disposal capacity of 69.94 million tons, cumulative construction debris, incorporating the conservative assumption that there is no recycling of construction wastes, constitutes 0.2 percent of the remaining inert landfill capacity. With a 50% reduction in the amount entering inert landfills, the total would be 63,500 tons, or 0.1 percent. Based on this small percentage, and the expected 60 life expectancy of these landfills, cumulative impacts on inert landfill capacity are concluded to be less than significant.

The estimated solid waste disposal resulting from the operations of the related projects, unto themselves as well as in conjunction with both Project Options, is shown in Table 92 on page 743. As indicated, the total cumulative solid waste disposal is forecasted to be 112,500 tons per year with the Project with County Office Building Option and 108,145 tons per year with the Project with Additional Residential Development Option. These levels of cumulative annual solid waste generation represent approximately 1.2 percent of the total solid waste generated in Los Angeles County in 2003. Based on these small percentages, and the County forecasts of 15 years of landfill availability, cumulative impacts on municipal landfill capacity are concluded to be less than significant.

It is anticipated that the Project and the other related projects would not conflict with solid waste policies and objectives in the SRRE or its updates, the CiSWMPP, the General Plan Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE, based on the programs in place to meet such diversion requirements. Impacts to solid waste policies and objectives intended to help achieve the requirements of AB 939 from implementation of the Project and related projects would not be cumulatively significant.

Table 92

Forecast of Cumulative Solid Waste Disposal

Use Type	Amount of Development	Units	Employees	Disposal Rate (tons/employees/ year)	Total (tons/year)
Commercial					
Retail	2,577,350	square feet	5,155	0.3	1,547
Office	11,677,301	square feet	46,709	1.7	79,405
Supermarket/Grocery	107,000	square feet	214	2.9	621
Restaurant/Bar	400,097	square feet	800	3.1	3,480
Hotel	2,550	rooms	2,318	2.1	4,868
Theater	12,200	seats	61	1.1	67
Total Commercial					88,987
Residential	17,762	d.u.		0.46	8,171
Schools					
Kindergarten-High School	6779	square feet	521	0.8	417
Performing Arts School ^a	128,000	square feet	128	0.8	102
Total School					519
Child Care	45	children	6	0.8	5
Community Facilities	296,800	square feet	594	0.9	535
Medical/Health Offices	84,075	square feet	336	1.5	504
Municipal/Civic Facilities					
Metro Jail	512	beds	51	0.4	20
Offices	2,940	employees	2,940	1.7	4,998
Courthouse with support offices, satellite library, and 150 parking spaces ^b	1,016,000	square feet	2,032	0.4	813
Total Municipal Facilities					5,831
Parking	11,366	stalls	23	0.9	21
Warehouse	640,000	square feet	422	1.9	802
Park	457,380	square feet	60	0.9	54
Total - Related Projects					105,428
Proposed Project					7,072

Table 92 (Continued)

Forecast of Cumulative Solid Waste Generation

Use Type	Amount of Development	Units	Employees	Disposal Rate (tons/employees/year)	Total (tons/year)
Total Cumulative With Proposed Project					112,500
Total - Related Projects					105,428
Additional Residential Development Option					2,717
Total Cumulative With Additional Residential Development Option					108,145

^a Assumes 2,000 square feet for each of 64 classrooms.

^b Information about the square footage of this project was not available. For the purpose of this analysis, it is assumed that the project has a similar intensity of use as an office use. As such, the square footage was calculated by integrating the number of trips generated by the project's use with the square footage generated by an office of comparable size.

Source: PCR Services Corporation

5. MITIGATION MEASURES

The proposed Project would have less than significant impacts with regard to solid waste service. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure J.3-1: Prior to the issuance of a certificate of occupancy for each construction phase, and thereafter during Project operations, Related, with regard to the five development parcels, shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the five development parcels. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure J.3-2: Prior to the issuance of each certificate of occupancy, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, a plan that designs all structures constructed or uses established within any part of the proposed Project site to be permanently equipped with clearly marked, durable, source sorted recyclable bins at all times to facilitate the separation

and deposit of recyclable materials. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.3-3: Prior to the issuance of each certificate of occupancy, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall prepare, and thereafter implement, a plan that designs primary collection bins to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

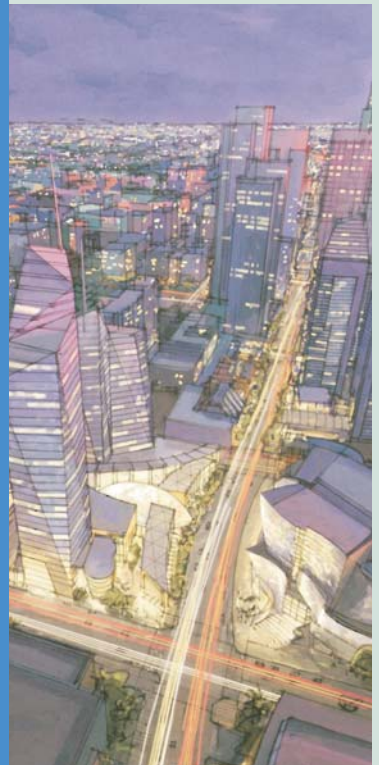
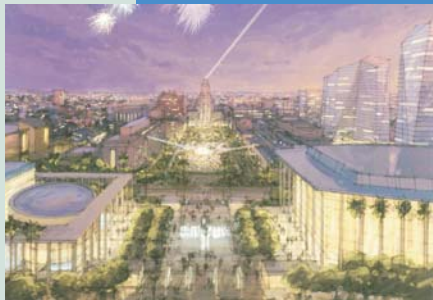
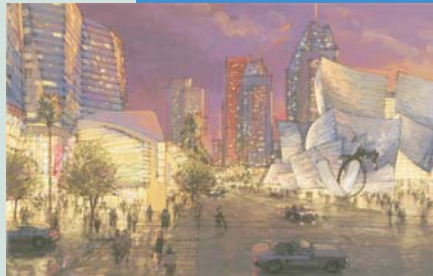
Regulatory Measure J.3-4: During Project operations, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall continuously maintain in good order for the convenience of businesses, patrons, employees and park visitors clearly marked, durable and separate bins on the same lot, or parcel to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.3-5: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction. The City's Department of Building and Safety, or other appropriate City agency or department, shall review and approve the plan with regard to the five development parcels and the Streetscape Program. The County's CAO and/or Department of Public Works shall review and approve the plan with regard to the Civic Park.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The analysis of potential solid waste impacts indicates that impacts of the Project would be less than significant. Nonetheless, mitigation measures have been proposed to identify compliance with plans, programs and policies for recycling, waste reduction and waste diversion. In conclusion, the proposed Project would not cause the available capacity of the existing and/or planned landfills to be exceeded, and impacts due to construction and operations would be less than significant. In addition, the Project would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Consequently, impacts relative to adopted solid waste diversion programs and policies would be less than significant. Impacts of the Project with County Office Building Option and the Project with Additional Residential Development Option would be substantially similar.

V. ALTERNATIVES



V. ALTERNATIVES TO THE PROPOSED PROJECT

A. INTRODUCTION

The State CEQA Guidelines (Section 15126.6[a]) require an EIR to: (1) describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project; and (2) evaluate the comparative merits of the alternatives. The State CEQA Guidelines (Section 15126.6[b]) direct that the analysis of alternatives be limited to alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

The selection and discussion of alternatives to the Project is intended to foster meaningful public participation and informed decision-making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote or speculative. The State CEQA Guidelines (Section 15126.6[e]) also require the analysis of a “No Project” alternative and the identification of an “Environmentally Superior Alternative.” If the environmentally superior alternative is the No Project “A” Alternative, then the EIR is required to identify an environmentally superior alternative among the other alternatives.

In addition, the State CEQA Guidelines (Section 15126.6[c]) require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Accordingly, alternatives that might avoid or substantially lessen Project impacts were considered. Of the alternatives that were considered, five were selected for analysis.

B. BASIC OBJECTIVES OF THE PROPOSED PROJECT

The following list identifies the basic objectives of the Project, pursuant to the requirements of Section 15124(b) of the State of California Environmental Quality Act (CEQA) Guidelines. The goal of the Grand Avenue Project as well as its priority objectives are set forth below and the Project objectives are presented in their entirety within Section II.B. Project Description of this Draft EIR.

GOAL

The ultimate goal of the Grand Avenue Project is to provide an economically viable, architecturally distinguished, community- oriented, mixed-use development with welcoming public open spaces that will create, define, and celebrate the Civic and Cultural Center as a regional destination in downtown Los Angeles.

OBJECTIVES

Priority Objectives

- Create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, through a mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill.
- Implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design, in order to create a pleasant living and working environment.
- Generate at least \$50 million in funds from the Project itself, and at least \$45 million from Phase 1, by the lease of public land, and use these funds to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve as a public gathering place for the entire region.
- Ensure that 20 percent of all residential units in the project are affordable units for low-income residents.
- Create a long-term stream of additional tax revenues for the City, the Community Redevelopment Agency and the County.

C. ALTERNATIVES SELECTED FOR THE ANALYSIS

As required by the CEQA Guidelines, this section of the Draft EIR describes reasonable alternatives to the Project, and evaluates the environmental impacts associated with each alternative. This section focuses on alternatives that potentially avoid or reduce the significant adverse impacts of the Project. Five alternative development scenarios have been developed and analyzed to assess the ability of any of these alternatives to reduce the Project's potentially significant impacts. Based on comparative evaluations, estimations are made as to the

environmental impacts of each alternative in contrast with those of the Project and the extent to which each alternative attains the basic Project objectives.

The Project's two options, namely the County Office Building Option and the Additional Residential Development Option, previously described in Section II, Project Description, and in Section IV, Environmental Impact Analysis, are development options, either of which could be implemented under the Project. Since the Project options have been thoroughly evaluated throughout Section IV of the Draft EIR, these options are also considered as an alternative, although analyzed at a much greater degree of detail than what is required of an alternatives analysis per the CEQA Guidelines. The Project alternatives selected for analysis are summarized in the following bullets, while tabular summary of the alternatives is presented in Table 93 on page 750. A more detailed description of the alternatives is provided as part of the analysis of each alternative.

- Alternative 1: No Project "A" – The Project site remains in its existing conditions.
- Alternative 2: No Project "B" – Development on Parcels Q and W-2 would occur per the provisions of the 1991 Owner Participation Agreement applicable to part of the Project site, while development on Parcels W-1, L, and M-2 would occur per current zoning. Under the No Project "B" Alternative, the Grand Avenue streetscape program would be limited to only improvements along the frontage of Parcel Q, while no improvements to the existing Civic Center Mall would occur.
- Alternative 3: Reduced Density Alternative – Development on the five parcels would be reduced by 25 percent, as would proposed building heights. Improvements within the Civic Park as well as along the Grand Avenue streetscape program would be reduced commensurate with the reduced funding for Phase I that would be available from prepaid lease revenues.
- Alternative 4: Alternative Design Alternative – Two components of the Project would be changed under this Alternative -- the Civic Park and the location of the towers on Parcels L and M-2. Under this Alternative, the existing Civic Center Mall's four character-defining features would remain as they exist today and in their current locations, or they would be retained and reused within the Civic Park in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings. Under this Alternative, the Project's potential significant impact with regard to historic resources would not occur. Also under this Alternative, the

Table 93

Comparison of Alternatives

Project Characteristics	The Grand Avenue Project		Alternatives				
	County Office Building Option	Additional Residential Development Option	1. No Project "A"	2. No Project "B"	3. Reduced Project	4. Alternative Design	5. Alternative Land Use
Residential Units	2,060 units	2,660 units	0	843	1,545 units	2,060 units	3,372 units
Affordable Units	412 units	532 units	0	169	309 units	412 units	674 units
Residential Floor Area	2,155,000 sq. ft.	2,836,000 sq. ft.	0	822,768	1,616,250 sq. ft.	2,155,000 sq. ft.	3,565,000 sq. ft.
Retail Floor Area	449,000 sq. ft.	449,000 sq. ft.	0	64,641	336,750 sq. ft.	449,000 sq. ft.	35,000 sq. ft.
Hotel Rooms	275 rooms	275 rooms	0	0	206 hotel rooms	275 rooms	0
Hotel Floor Area	315,000 sq. ft.	315,000 sq. ft.	0	0	236,250 sq. ft.	315,000 sq. ft.	0
Office Floor Area	681,000 sq. ft.	0	0	1,565,792	510,750 sq. ft.	681,000 sq. ft.	0
Total Commercial	1,445,000 sq. ft.	764,000 sq. ft.	0	1,630,433	1,083,750 sq. ft.	1,445,000 sq. ft.	35,000 sq. ft.
Total Floor Area	3,600,000 sq. ft.	3,600,000 sq. ft.	0	2,453,201	2,700,000 sq. ft.	3,600,000 sq. ft.	3,600,000
Civic Mall Renovation and Expansion Area	16 acres	16 acres	0 acres	0 acres	Up to 16 acres	16 acres	16 acres
Description/Funding	Conceptual Plan/Project generated funding of at least \$50 million, of which \$46 million would be generated by Phase 1	Conceptual Plan/Project generated funding of at least \$50 million of which \$46 million would be generated by Phase 1	No renovation or expansion	No renovation or expansion	Improvements would range from renovation of existing Civic Mall to no improvements across all or a portion of the 16-acre site/Project generated funding of \$50 million of which \$34.3 million would be generated by Phase 1	Conceptual Plan with retention of contributing features/Project generated funding of at least \$50 million of which \$46 million would be generated by Phase 1	Conceptual Plan/Project generated funding of at least \$50 million of which \$49.4 million would be generated by Phase 1
Grand Avenue Streetscape	Conceptual Plan would be implemented.	Conceptual Plan would be implemented.	Conceptual Plan would not be implemented.	Conceptual Plan would be implemented only in front of Parcel Q.	Scope of improvements reduced commensurate with available funding.	Conceptual Plan would be implemented.	Conceptual Plan would be implemented.

towers proposed for development on Parcels L and M-2 would be reversed, such that the tower proposed for the southeast corner of Parcels L and M-2 would be moved to the southwest corner, and the tower proposed for the northwest corner would be moved to the northeast corner

- Alternative 5: Alternative Land Use Alternative – development on all five development parcels would be residential supported by a limited amount of retail development. The Civic Park and Grand Avenue streetscape program under this Alternative are the same as the Project.

D. ALTERNATIVES CONSIDERED BUT REJECTED

The State CEQA Guidelines, Section 15126.6 states that an EIR shall consider a reasonable range of alternatives to the proposed project and that the EIR should briefly describe the rationale for selecting the alternatives to be discussed. The reasons for rejecting alternatives from detailed consideration include the following: (i) failure to feasibly meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid or significantly lessen significant environmental impacts.

The analysis of alternatives started with an identification of alternatives to the Project that had the potential to reduce or eliminate the Project's significant environmental impacts. The alternatives identified were then evaluated to determine those alternatives that would be analyzed further within the Draft EIR as well as those alternatives that would be rejected from further review. The alternative that was identified but subsequently rejected from further analysis was the Alternative Location Alternative.

An EIR is not required to consider alternatives which are infeasible. The development of the Project at an alternative location is not considered feasible since the nature of the Project is geographically specific to the Civic Center Mall, Grand Avenue, and the four remaining publicly owned and undeveloped Bunker Hill Redevelopment Project parcels. Since the Project is comprised specifically of Civic Center Mall, Grand Avenue, and the Bunker Hill Redevelopment Project parcels, the expansion and renovation of Civic Center Mall or the development of Grand Avenue streetscape improvements between Fifth Street and Cesar E. Chavez Avenue in another location would be infeasible. Also under CEQA, factors used to eliminate alternatives from detailed consideration include the failure to meet most of the Project's objectives. The relocation of the Project to another site would not meet most of the basic objectives of the Project and is, therefore, not evaluated as a Project alternative. CEQA also provides that the analysis of an alternatives' location need only be considered if the alternative locations would avoid substantially lessen Project impacts. The relocation of the Project to another location would not

substantially reduce the Project's primary significant impacts relative to traffic, air quality, and noise; and would likely have a greater impact regarding land use compatibility, visual context and scale, since it is specific to a highly urbanized environment.

Although an alternative location would eliminate potentially significant historical and specific view impacts, it would likely cause view impacts in an alternative location due to the size of the proposed buildings. Therefore, the relocation of the Project to another location is not evaluated as a Project alternative.

Another alternative that was considered and rejected included the development of institutional uses, such as schools and hospitals, in the remaining Bunker Hill Redevelopment Project parcels, Parcels Q, W-1/W-2, L, and M-2. This alternative was rejected since it would have a substantial significant Land Use impact in relation to the implementation of the policies of adopted plans and policies, including housing policies of the General Plan Framework; policies of the Central City Community Plan to encourage a mix of uses which create a 24-hour downtown environment; policies of the Bunker Hill Redevelopment Plan to provide convenient and efficient living accommodations for downtown employees and a range of housing types, including affordable housing; the policies of the existing Bunker Hill Design for Development which call for a mix of commercial and residential uses in these parcels; and policies of the Downtown Strategic Plan, which recognize the need to substantially increase the residential presence in the downtown community. It would also not implement the jobs/housing balance goals of SCAG's Regional Comprehensive Plan and Guide (RCPG) or the goals of the RCPG to place high-density multi-family uses within urban centers in close proximity to transit and other multi-modal transportation opportunities. This alternative would also not meet the basic objectives of the Project to provide a mixed-use development with a mix of uses that are economically viable.

E. ANALYSIS METHODOLOGY

Alternatives 1 through 5 are evaluated in sequence below and are evaluated to a lesser degree of detail than that completed for the Project, but in sufficient detail to determine whether overall environmental impacts after mitigation would be greater, similar, or less than the corresponding impacts of the Project, and in sufficient detail to determine whether the Project's basic objectives are substantially attained. To determine the comparative impacts, the process described below has been followed:

- An evaluation of the environmental impacts anticipated for each alternative in comparison to the Project with County Office Building Option or the Project with Additional Residential Development Option, as explained below, including the ability

of each alternative to avoid or substantially lessen any significant environmental impacts associated with the Project with County Office Building Option or the Additional Residential Development Option. Where the impacts of the alternative and the proposed Project would be roughly equivalent, the comparative impact is said to be “similar”;

- If applicable, a description of the impacts of each alternative that are not impacts of the proposed Project; and
- A statement of whether each alternative is feasible and meets the objectives of the proposed Project.

The environmental topics for each alternative are compared individually to the Project option that represents the higher degree of impact. For instance, since traffic impacts would be greater under the Project with County Office Building Option, the traffic impacts for each of the alternatives are compared to the Project with County Office Building Option. In cases in which impacts would be greater under the Project with Additional Residential Development Option (i.e., recreation and parks), the impact for each of the alternatives is compared to the Project with Additional Residential Development Option. In cases in which impacts would essentially be the same under both Project Options (i.e., fire services), each of the alternatives is compared to the Project with County Office Building Option, although the same comparison would be true for the Project with Additional Residential Development Option. The Project with County Office Building Option would generate impacts that would be greater than, or similar to, the Additional Residential Development Option in all environmental topics, with the exception of schools, recreation and parks, and libraries. Further it should be noted that in order to provide a more stable description of the alternatives evaluated herein, each alternative assumes only one type of development option for Parcels W-1/W-2. Thus, for Alternatives 3 and 4, the Project with County office Building Option is assumed for those two alternatives.

F. EVALUATION OF THE ALTERNATIVES

1. Alternative 1: No Project “A”

a. Introduction and Description of the No Project “A” Alternative

CEQA Guidelines Section 15126.6 (e)(3)(B) states that the “No Project” alternative is “a circumstance under which a project does not proceed and may be considered “the environmental effects of the property remaining in its existing state.” The No Project “A” Alternative assumes that the Project would not be developed and that the existing land uses within the Project Site

would remain as they are today (i.e., unchanged). As a result, under Alternative 1, the streetscape improvements on Grand Avenue would not occur, improvement and expansion of the existing Civic Center Mall would not occur, and Parcels Q, W-1/W-2, L, and M-2 would remain as parking lots. Thus, this Alternative would produce no change to the existing physical condition and use of the overall Project site. The No Project “A” Alternative is compared to the Project as well as Alternatives 2 through 5 in Table 93 on page 750. A summary of comparative impacts is presented at the end of the Alternatives analysis in Table 119 on page 848.

b. Analysis of Alternative

(1) Land Use

(a) Civic Park

The No Project “A” Alternative assumes that no changes would occur to the Civic Center Mall. Under this Alternative, the improvement and eastern extension to the existing Civic Center Mall would not occur. As a result, the Conceptual Plan to develop a public plaza in the eastern section of the park, or a venue for local and regional activities, such as concerts, cultural festivals, art shows, marathons or other race events, would not occur. Redevelopment of the western section of the Civic Center Mall to improve pedestrian access into the park from Grand Avenue would also not occur, and the alteration of the garage ramps and the widening of crosswalks to improve pedestrian access would also not occur. The existing surface parking lot in the eastern section of the park would continue to operate as under existing conditions. Land use impacts associated with the No Project “A” Alternative would be less than significant as no changes would occur under this Alternative. However, since the existing surface parking lot in the eastern section of the Civic Center Mall is not consistent with existing land use plans, including the General Plan Framework and the Central City Community Plan, which call for open space, and the Los Angeles Civic Center Shared Facilities and Enhancement Plan, which calls for the extension of the park to Los Angeles’ City Hall, the No Project “A” Alternative with regard to the Civic Park would be less environmentally advantageous in relation to land use plans and policies than the Project.

(b) Grand Avenue Streetscape

Under the No Project “A” Alternative, the Grand Avenue streetscape program would not be implemented. Conceptual streetscape improvements, including street trees and pedestrian lights, would not be added, and areas along Grand Avenue that are currently devoid of landscaping and visual interest would not be upgraded. The No Project “A” Alternative would not promote Grand Avenue as a “cultural corridor” that would enhance public focus on the City’s cultural core, which is currently represented by the Walt Disney Concert Hall, Dorothy

Chandler Pavilion, Ahmanson Theater, Mark Taper Forum, the Colburn School of Performing Arts and MOCA. The No Project “A” Alternative would not support or encourage greater pedestrian activity or support the vision of the City as a pedestrian-safe 24-hour city. Although the No Project “A” Alternative would not generate any significant land use impacts, it would not support existing plans and policies to the same extent as the Project and thus, would be less environmentally advantageous than the Project in relation to existing land use plans and policies.

(c) Parcels Q, W-1/W-2, L, and M-2

Parcels Q, W-1/W-2, L, and M-2 would not be developed within urban land uses under the No Project “A” Alternative and would continue to be used as public parking facilities. The No Project “A” Alternative would not meet implement the Downtown Center designation of the General Plan Framework, nor the Framework’s housing policies nor development in centers and near transportation nodes. The No Project “A” Alternative would not meet the objective of the Central City Community Plan to increase housing choices to downtown employees or to foster residential development that can accommodate a range of incomes. The No Project “A” Alternative would not be consistent with the intent of the Bunker Hill Design for Development to redevelop under-utilized sites or provide high quality high-rise buildings at the crest of the Hill (Grand Avenue) in the Bunker Hill Redevelopment Project area. The No Project “A” Alternative would not be consistent with the policies of the Downtown Strategic Plan to foster public/private partnerships to bring activity generators, such as retail, entertainment, housing and support systems to downtown Los Angeles. The No Project “A” Alternative would also not implement the goals of the City of Los Angeles General Plan Framework or SCAG’s Regional Comprehensive Plan and Guide (RCPG) with regard to increasing the density of housing in jobs-rich areas, in areas near public transit, and in areas needing recycling and redevelopment. The No Project “A” Alternative would not increase the vibrancy of the downtown or the identity of downtown Los Angeles as a 24-hour city, since no new residents would be introduced to this predominantly commercial area. The No Project “A” Alternative would be less compatible with surrounding land uses than the Project, since the existing surface parking lots strongly contrast with the existing surrounding high-rise, cultural, and architecturally noteworthy urban environment. The No Project “A” Alternative would not support downtown visitors, since it would not provide entertainment or street front retail or restaurant uses. The No Project “A” Alternative would avoid the Project with County Office Building Option’s significant impact associated with zoning compliance since no development would occur. Although the No Project “A” Alternative would not generate any significant land use impacts and would avoid the Project’s potentially significant impact relative to zoning compliance, it would be less environmentally advantageous than the Project with County Office Building Option in relation to land use compatibility and implementation of existing land use plans and policies.

(2) Transportation, Circulation, and Parking

(a) Construction

No impacts associated with worker parking, haul trucks, temporary closures of streets, and closure of the Civic Mall parking structure ramps on Hill Street and Grand Avenue would occur. Since the No Project “A” Alternative would not generate any construction traffic impacts, it would entirely avoid the construction impacts generated by the Project with County Office Building Option.

(b) Traffic and Circulation

Under the No Project “A” Alternative, projected traffic conditions would be the same as under the projected 2015 Cumulative Base conditions (Draft EIR, Section IV.B). While traffic conditions would worsen in the future due to the additional traffic growth, the majority of intersections would continue to operate at LOS C or better during future peak hours, with the exception of the eleven intersections that would operate at LOS D or E in the A.M. and/or P.M. peak hours (Section IV.B, Table 16). Of these, under the Cumulative Base conditions, seven intersections would be impacted during the A.M. peak hour and ten intersections would operate at D or greater during the P.M. peak hour. Under Cumulative Base conditions, service levels would increase from LOS C to E at two intersections in the A.M. peak hour and at four intersections in the P.M. peak hour.

The Project with County Office Building Option would result in a significant traffic impact at one intersection in the A.M. peak hour and thirteen intersections in the P.M. peak hour. Since the Project’s traffic would not be added to the “Cumulative Base Conditions,” the No Project “A” Alternative would have fewer significant traffic impacts than the Project with County Office Building Option. The potentially significant and unavoidable impacts that would be generated by both Project options would be avoided by the No Project “A” Alternative. The No Project “A” Alternative would avoid the Project’s potentially significant short-term traffic congestion associated with large festivals and other special events in the Civic Park.

(c) Transit

Since no development would occur under the No Project “A” Alternative, no new employees, visitors, or residents, a percentage of which would use the buses and subway transit in the area, would be generated. Since estimated transit ridership is based on a small percentage of projected vehicle trips, of which there are none under this Alternative, the No Project “A” Alternative would generate no demand on transit capacity. As such, the No Project “A” Alternative would have no impact on transit. Although the impact on transit under the Project

with the County Office Building Option would be less than significant, the No Project “A” Alternative would completely avoid the less than significant impacts on transit generated by the Project.

(d) Parking

Under the No Project “A” Alternative, the 1,818 existing parking spaces located within Parcels Q, W-1/W-2, L, and M-2 and the 349 parking spaces located in the Civic Center Mall surface parking lot would not be removed. Demand for parking that would be, otherwise, generated by the Project with County Office Building Option’s employees, residents and visitors would also not occur, and the removal of 33 on-street parking spaces along the edges of the Project site would not occur as well. The Project’s potentially significant impact associated with the Deputy Advisory Agency Residential Policy (DAARP) would also not occur. Therefore, the No Project “A” Alternative would be environmentally advantageous in maintaining existing parking since it would not result in the Project’s less than significant impacts on existing onsite and offsite parking and would avoid the Project’s potentially significant impact in relation to the DAARP of 2.5 spaces per dwelling unit.

(3) Aesthetics

(a) Visual Quality

No construction would occur under the No Project “A” Alternative and the contrast and general disruption in the aesthetic character of the area caused by Project excavation and construction of new structures and facilities would not occur. In addition, the less than significant potential disruption of the Grand Avenue sidewalks for the installation of pedestrian features, possible widening, and during construction of adjacent parcels would not occur. Construction within the Civic Center Mall, including the potential removal of existing character-defining features would not occur. Although the Project’s construction activities would reduce the existing visual attributes of the five development parcels during the construction phases, these parcels do not currently contain any aesthetic features that contribute to the existing visual character of the area. With mitigation, the Project with County Office Building Option would have less than significant visual quality impacts associated with construction. However, since the No Project “A” Alternative would avoid the Project with County Office Building Option’s construction impacts, the No Project “A” Alternative would be environmentally advantageous compared to the Project with County Office Building Option, which would generate short-term, although less than significant, construction visual quality impacts.

Under the No Project “A” Alternative, no changes in the visual character of the Project site and surrounding area would occur. Since the existing parking lots do not contribute to the

visual quality of the area, the retention of such uses would not have any particular environmental benefit. Under this Alternative, the visual amenities associated with the Project with County Office Building Option's architectural style and other architectural and landscape features would not be developed. Under the No Project "A" Alternative, visual access to the Civic Park from Grand Avenue would not be improved. The surface parking lot at the front of City Hall would not be replaced with an extension of the existing Civic Center Mall and the possible creation of a public plaza in this area. The No Project "A" Alternative would not improve the quality of the streetscape on Grand Avenue. Visual enhancements associated with the Project, including the development of landmark residential towers contributing to the diversity and interest of the downtown skyline, as well as the integration of plaza, street front retail uses and restaurants with the Grand Avenue streetscape would not occur. Furthermore, the Project's design and landscape features, which aid in further integrating the design features set forth in the CRA/LA's urban design policies, would not be developed at the Project site under this Alternative. Although both the No Project "A" Alternative and the Project with County Office Building Option would have less than significant visual quality impacts, the No Project "A" Alternative would be less environmentally beneficial in relation to the visual quality of the Project site and the downtown area.

(b) Views

The No Project "A" Alternative would not result in the construction of any buildings and, as such, would not result in the Project's potentially significant obstruction of views of City Hall and the Walt Disney Concert Hall from the 28-story Grand Promenade Tower apartment building and valued views of City Hall from the Olive Street sidewalk. Therefore, the No Project "A" Alternative would avoid the Project with County Office Building Option's potentially significant view obstruction impacts.

(c) Light and Glare

Since no residential and office buildings, hotel, or retail businesses would be constructed under the No Project "A" Alternative, this Alternative would not increase ambient lighting associated with development and illuminated signage. The No Project "A" Alternative would not introduce any new or additional street lights, pedestrian lights, or security or event lighting in the Civic Park. In addition, no buildings would be constructed that could result in potentially significant reflected sunlight glare impacts. The No Project "A" Alternative would eliminate the Project with County Office Building Option's less than significant impacts associated with increased ambient light and would avoid the Project's potentially significant reflected sunlight glare impacts.

(d) Shade/Shadow

No buildings would be constructed under the No Project “A” Alternative and no new shading would occur. Although the Project with County Office Building Option would result in a less than significant shade/shadow impact, shading on any sensitive uses that would be shaded by the Project at some point during the day, depending on the season, would be avoided. As such, the No Project “A” Alternative would eliminate the Project’s less than significant shade/shadow impact on the future Central Los Angeles Senior High School of Performing Arts (north of the Hollywood Freeway), the Walt Disney Concert Hall, the Promenade Tower Apartments, Angelus Plaza Senior Housing, and the Cathedral of Our Lady of the Angels. Although the Project with County Office Building Option’s shade/shadow impacts would be less than significant, the No Project “A” Alternative would avoid any new shading. As such, the No Project “A” Alternative would be environmentally advantageous in relation to shade/shadow impacts..

(4) Historical Resources

The Project as proposed would not be implemented under the No Project “A” Alternative. Although the Grand Avenue Streetscape and Civic Park Conceptual Plans, as currently proposed, would not significantly impact the cultural context of adjacent resources, including the Walt Disney Concert Hall, the Music Center, the Stanley Mosk County Courthouse, the Cathedral of Our Lady of the Angels, the Kenneth Hahn Hall of Administration, and the grouping of buildings that comprise the Civic Center, which is considered a potential historic district, potentially significant impacts could result if the final design for the streetscape program or Civic Park development obscures visual access to the identified historic resources.

Since the Project’s Civic Park Conceptual Plan would not be implemented under this Alternative, no impact on the historic resources within the existing Civic Center Mall, which is eligible for individual listing in the California Register, or the buildings along Grand Avenue that are potentially affected by the streetscape program, would occur. For example, the No Project “A” Alternative would not result in any significant impacts to the park relative to the water feature (both the fountain and pools) acting as a focal point for the park; the pink granite clad planters, pink granite clad retaining walls, and concrete benches; the existing elevator shaft structures in their totality, and the light poles with saucer-like canopies and the “hi-fi” speaker poles with saucer-like canopies. The elimination of the Grand Avenue streetscape improvements under the No Project “A” Alternative would preclude the potential impacts that could occur under the Project. The elimination of new development on Parcels Q, W-1/W-2, L, and M-2 would have no effect on the Project’s potential historic impacts as Project development on these parcels has no effect on historic resources.

(5) Population, Housing and Employment

Under the No Project “A” Alternative, there would be no increase in the amount of housing and population in the Project area, nor would any increases in employment opportunities occur. As is the case with the proposed Project with County Office Building Option’s, population, housing and employment growth projections would not be exceeded; and impacts regarding growth would be less than significant. However, if the Project were not implemented, at least some of its growth could occur in other locations within the City of Los Angeles Subregion, or even in the larger SCAG regional area. Development of the Project’s housing at an alternate location may not offer the same advantages as the location of the Project’s housing in the jobs-rich downtown area. The Project with County Office Building Option’s advantage of increasing the amount of downtown housing at a faster rate than hoped for would also not be realized. Therefore, impacts of the No Project “A” Alternative on growth would be considered less advantageous than the Project’s.

Further, the No Project “A” Alternative would be less advantageous than the Project with County Office Building Option with regard to plan consistency. Numerous policies that are supported by the Project would not be supported by the No Project “A” Alternative. These include policies that encourage (1) increases in the housing stock and the availability of affordable units, (2) placement of housing in the jobs-rich downtown area, (3) placement of a substantial amount of housing at the hub of transportation, public transportation and pedestrian route opportunities, and (4) the creation of employment opportunities, with its contributory effect on the existing vibrancy in the downtown area. However, the No Project “A” Alternative would not work against growth plans and policies, nor preclude their pursuit in the future. Therefore, the impacts of the No Project “A” Alternative on plan consistency would like the Project’s be less than significant. While not significant, impacts of the No Project “A” Alternative on Population, Housing and Employment would be greater (i.e., less advantageous) than those of the proposed Project with County Office Building Option.

(6) Air Quality

This Alternative would include no new development, and therefore would not generate air pollutants. Impacts would be less than significant, whereas the Project with County Office Building Option would have a significant impact on Air Quality during construction and operation.

(7) Noise

No development would occur within the Project site under this Alternative. Consequently, it would not generate any new or increased sources of noise on the Project site or

within the surrounding vicinity. Impacts would be less than significant, whereas the Project with County Office Building Option would have a short-term significant impact relating to construction noise.

(8) Hazardous Materials

Under the No Project “A” Alternative, no excavation or construction activities would occur on the Project Site. Potential exposure to previously unrecorded hazardous materials would not occur since no excavation or construction would take place. However, under the No Project “A” Alternative, if unknown hazardous materials were to exist within any of the development parcels or within the fill soils in the Civic Park, such materials would not be removed from the site, and the potential for future exposure would continue to exist. Potential exposure to hazardous materials would be reduced to less than significant levels through compliance with regulatory measures under the Project. Since no mitigation would occur under the No Project “A” Alternative, a potential hazard would continue. However, since the existing parking lot uses would remain in the five parcels, any unknown hazardous materials would remain buried and sealed under the existing asphalt or concrete surfaces. Since no disturbance of the Project Site would occur under the No Project “A” Alternative, while hazardous materials would be removed as part of the Project, the impact of the No Project “A” Alternative relative to hazardous materials would be incrementally greater than the Project with County Office Building Option.

(9) Public Services

(a) Fire Services

Under the No Project Alternative, there would be no impact on City fire services from construction or operations. Lack of construction activity would eliminate the chance of construction related incidents requiring emergency response, and would also avoid potential short-term impacts on emergency access due to lane closures for construction. Likewise, lack of on-going operations at the Project site would reduce the potential for incidents at the Project site, and eliminate the potential for impacts on emergency access. In contrast, the Project with County Office Building Option would generate demand for fire services and generate traffic that could potentially affect emergency access. However, sufficient fire facilities are located within the specified regulatory distances, and the Project would be required to provide fire flows, and site/building design to meet the City’s standards for fire protection, thus avoiding significant impacts. Impacts of the No Project Alternative would be less than those of the Project with County Office Building Option, but would be similarly less than significant.

(b) Police Services

Under the No Project “A” Alternative, there would be no impact on police services from construction or operations. Lack of construction activity would eliminate the chance of construction related incidents requiring emergency response, and would also avoid potential short-term impacts on emergency access due to lane closures for construction. Likewise, the lack of on-going operations would reduce the potential for incidents at the Project site, and eliminate the potential for impacts on emergency access.

In contrast, the Project with County Office Building Option would generate demand for police services and generate traffic that could potentially affect emergency access. Construction activities could result in temporary lane closures, and the storage of construction equipment and materials on site could result in theft.

Operations of the Project with County Office Building Option would add 2,925 residents and 4,559 commercially related persons to the site, a total increase in population of 7,484 persons. This would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 152 persons. With the additional site population, there would be an estimated increase in crimes of 1,153 cases, or 3.4 crimes more per year that would be handled by each officer. With private security, especially for park activities, and mitigation measures for site safety and protection, Project impacts would be less than significant. Therefore, impacts of the No Project “A” Alternative, would be less than those of the Project, but would be similarly less than significant.

(c) Schools

Under the No Project “A” Alternative, there would be no impact on school services from construction or operations. There would be no construction activities to interfere with school accessibility. However, due the location of the Project site, its development would also not interfere with school accessibility.

Further, the No Project “A” Alternative would not generate new school students, and would therefore have no impacts on schools. In contrast, the Project with Additional Residential Development Option would generate 632 local LAUSD students, which consists of 314 elementary school students, 157 middle school students, and 161 high school students. These students would exceed anticipated seating capacity at Castelar and Gatts Elementary Schools, even after the development of new schools in the area. Project impacts would be mitigated through the payment of fees for new schools per California Government Code Section 65995. Impacts of the Project with Additional Residential Development Option would be less than

significant. Impacts of the No Project “A” Alternative would be less than the Project’s and would also be less than significant.

(d) Parks and Recreation

The No Project “A” Alternative would require no construction within the existing Civic Center Mall and, as such, would avoid the Project’s potentially significant, short-term impact on park and recreation facilities that are currently present within the existing Civic Center Mall.

The No Project “A” Alternative would not generate new population demand for park space, nor would it provide the 16-acre Civic Park with its regional serving benefits. In contrast, the Project with Additional Residential Development Option would generate 3,777 residents. The No Project “A” would avoid the Project with Additional Residential Development Option’s short-term significant impact associated with the closure of Civic Center Mall during construction. The analysis of the Project with Additional Residential Development Option’s impacts on park space addresses the additional demand on park space that would be generated by Project’s added population, pursuant to City methods for analyzing and providing new park space for City residents. The analysis recognizes the Project meets the City’s Quimby requirements through the provision of dedicated park space at a rate of 3 acres per 1,000 population, payment of in-lieu fees, or a combination of the two. Such contributions to the City’s park facilities would accommodate the additional park demand, and avoid a significant impact on parks and recreation services.

Therefore, the Project with Additional Residential Option would offset its respective impacts, as well as provide an additional park and recreation amenity with the regionally serving Civic Park improvements. As the No Project “A” Alternative would not include the Civic Park improvements, it would be considered less advantageous and inferior to the Project with Additional Residential Option during operation. However, since the No Project “A” Alternative would have no impact on parks, its impacts would also be considered less than significant.

(e) Libraries

The No Project “A” Alternative would not generate new population, and would therefore have no impacts on library services. In contrast, the Project with Additional Residential Development Option would generate 3,777 residents as well as employees, hotel patrons, visitors and tourists who might use the downtown Central Library, a regional facility, and/or other nearby libraries. The Project with Additional Residential Option’s additional population is not expected to exceed the libraries’ defined target service population, nor require library expansion. Therefore, Project impacts are less than significant. Without new development, and the resulting

new demand for library services, impacts of the No Project Alternative would be less than those of the Project With Additional Residential Option. Impacts of the No Project “A” Alternative on library services would also be less than significant.

(10) Utilities

(a) Water Supply

The No Project “A” Alternative would not add new facilities or population at the Project site, and, thus, would have no impact on the available water supply. In contrast, the Project would require new hook-ups during construction that could affect traffic in the area; and would add new water-consuming uses at the Project site. The estimated net water demand for the Project with County Office Building Option is 844,403 gallons per day on average, and 1,435,484 gallons on a peak day. Water infrastructure and water supply is sufficient to meet these demands, as well as the Project’s requirements for fire flow. Therefore, these impacts would be less than significant. Impacts of the No Project “A” Alternative would be less than under the Project and would, likewise, be less than significant.

(b) Wastewater

The No Project “A” Alternative would not add new facilities or population at the Project site and would have no impacts on wastewater generation. In contrast, the Project with County Office Building Option would require new hook-ups during construction that could affect traffic in the area; and both would add new water consuming uses at the Project site. The estimated net wastewater generation for the Project with County Office Building Option is ,631,650 gallons per day on average, and 1,073,805 gallons on a peak day. Wastewater infrastructure and capacity is sufficient to meet these demands. Therefore, these impacts would be less than significant. Impacts of the No Project “A” Alternative would be less than under the Project, and would likewise be less than significant.

(c) Solid Waste

The No Project “A” Alternative would produce no solid waste from construction or Project operations. In contrast, the Project with County Office Building Option would generate 31,120 tons of solid waste due to construction activity, and an estimated 7,072 tons of solid waste disposal per year due to Project operations. The analysis of the Project’s solid waste impacts indicates that the inert landfills that would accept the construction debris have an estimated 60 year capacity. Further, the Project’s solid waste due to operations would comprise less than 0.001 percent of the 9.11 million tons of total waste generated within the City of Los Angeles and disposed of daily at major landfills in the region, and planning for future needs is

being based on a 15 projected needs bases. Therefore, impacts of the Project on solid waste would be less than significant. Impacts of the No Project “A” Alternative would be less, and would also be less than significant.

c. Relationship of No Project “A” Alternative to the Project Objectives

The No Project “A” Alternative would not meet the ultimate goal of the Project to provide an economically viable, architecturally distinguished community- oriented, mixed-use development with welcoming public open spaces that would create, define, and celebrate the Civic and Cultural Center as a regional destination in downtown Los Angeles. In addition, the No Project “A” Alternative would also not meet any of the Project’s priority objectives. It would not meet the priority objective to create a vibrant 24-hour development that activates the Civic and Cultural Center through a mix of uses that complement each other, and that add to those that already exist on Bunker Hill; or meet the priority objective to implement the redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design. This alternative would also not meet the priority objective to generate at least \$50 million in funds from the Project itself, and at least \$45 million from Phase 1, by the lease of public land, and the use of these funds to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve the entire region. This alternative would also not meet the priority objective of providing affordable units and it would not meet the priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County. The No Project “A” Alternative would also not meet the additional objectives of the Project in that it would not generate specific public benefits; activate downtown Los Angeles, create a civic gathering place, enhance pedestrian connections, create distinguished architectural design, or facilitate achievement of redevelopment goals for the Bunker Hill District and the Central Business District.

The No Project “A” Alternative would avoid the Project’s significant and unavoidable impacts associated with compliance with existing zoning designations, construction hauling, periodic closures of the Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Mall during their relocation, any temporary lane closures, intersection service thresholds, occasional traffic congestion during evening and large-scale events in the Civic Park, DAARP residential parking requirements, view obstruction, character-defining features in the Civic Center Mall, , air quality (construction and operation), noise (construction), and parks and recreation (during construction of Civic Park), but would be less beneficial in relation to the implementation of existing land use plans and visual quality. The No Project “A” Alternative, however, would not eliminate significant, unavoidable traffic impacts that would occur under future baseline traffic conditions, without the Project. A tabular comparison of the impacts under the No Project “A” Alternative and the Project is presented in Table 119 which starts on page 848.

2. Alternative 2: No Project “B”

a. Introduction and Description of the No Project “B” Alternative

CEQA Guidelines Section 15126.6(e)(3)(C) sets forth the provisions for analyzing the No Project Alternative under a different set of assumptions than those identified above for Alternative 1. Under this CEQA Guidelines Section, the No Project Alternative is defined as what “would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Under No Project “B” Alternative, Parcels Q and W-2 would be developed according to the provisions of the 1991 Owner Participation Agreement (OPA) for the Bunker Hill Urban Renewal Project, while Parcels L, M-2, and W-1 would be developed per existing zoning. Per the 1991 OPA, Parcel Q would be developed almost entirely with office uses along with a relatively limited amount of retail uses, while Parcel W-2 would remain as a parking facility, albeit somewhat larger than what currently exists. Parcels L and M-2 would be developed according to their existing R5-4D zone and Parcel W-1 would be developed according to the existing R5-4D and C2-4D zones. Based on these land use parameters, the No Project “B” Alternative would include development of up to 843 residential units, including 169 affordable units; approximately 64,641 square feet of retail floor area; and approximately 1,565,792 square feet of office floor area. Approximately 400 parking spaces would occur on Parcel W-2. Furthermore, under the No Project “B” Alternative, the proposed improvement and expansion of the existing Civic Center Mall would not occur and the proposed streetscape improvements along Grand Avenue would only be implemented in front of Parcel Q. The No Project “B” Alternative is compared to the Project with County Office Building Option in Table 94 on page 767. As shown in Table 94, the No Project “B” Alternative would have considerably reduced residential uses and considerably greater office uses. The components of the No Project “B” Alternative are compared to the Project and Alternatives 1, 3, 4, and 5 in Table 93. A summary of comparative impacts is presented at the end of the Alternatives analysis in Table 119 on page 848.

b. Analysis of Alternative

(1) Land Use

(a) Civic Park

The No Project “B” Alternative assumes that no changes would occur to the existing Civic Center Mall. Under this Alternative, the improvement and eastern extension of the existing Civic Center Mall would not occur. As a result, the Conceptual Plan to develop a public

Table 94

Alternative 2
Comparison of the Project With County Office Building Option and the No Project “B” Alternative

Components	Project with County Office Building Option	Alternative 2	Numerical Difference	Percent Change
Residential				
Parcel Q	500 units	0 units	- 500 units	100 % decrease
Parcel W-1	710 units	184 units	- 547 units	77.0 % decrease
Parcels L and M-2	850 units	659 units	- 191 units	22.4 % decrease
Total residential units	2,060 units	843 units	- 1,217 units	59.0 % decrease
Total affordable units	412 units	169 units	- 243 units	59.0 % decrease
Total residential floor area	2,155,000 sq. ft.	822,768 sq. ft.	- 1,332,232 sq. ft.	61.8 % decrease
Total hotel rooms (Parcel Q)	275 hotel rooms	0	- 275 hotel rooms	100 % decrease
Total hotel floor area:	315,000 sq. ft.	0	- 230,000 sq. ft.	100 % decrease
Total retail floor area (Parcels Q and W-1)	449,000 sq. ft.	64,641 sq. ft.	- 384,359 sq. ft.	85.6 % decrease
Total office floor area (Parcels Q and W-1)	681,000 sq. ft.	1,565,792 sq. ft.	+884,792 sq. ft.	129.9 % increase
Total Commercial floor area	1,445,000 sq. ft.	1,630,433 sq. ft.	+185,433 sq. ft.	12.8 % increase
Total Floor Area	3,600,000 sq. ft.	2,453,201 sq. ft.	1,146,799 sq. ft.	31.9 % decrease
Conceptual Civic Park Plan	16 acres	Existing Civic Center Mall Retained	0	No improvements or expansion of the existing Civic Center Mall
Grand Avenue Streetscape Plan	Fifth St. to Cesar E. Chavez Ave.	In front of Parcel Q Only	0	Most of the proposed improvements would not occur

Source: PCR Services Corporation, April 2006

plaza in the eastern section of the park, or a venue for local and regional activities, such as concerts, cultural festivals, art shows, marathons or other race events, would not occur. Redevelopment of the western section of the Civic Center Mall to improve pedestrian access into the park from Grand Avenue would also not occur, and the alteration of the garage ramps and the widening of crosswalks to improve pedestrian access would also not occur. The existing surface parking lot in the eastern section of the park would continue to operate as under existing conditions. Land use impacts associated with the No Project “B” Alternative would be less than significant as no changes would occur under this Alternative. However, since the existing surface parking lot in the eastern section of the Civic Center Mall is not consistent with existing land use plans, including the General Plan Framework and the Central City Community Plan, which call for open space, and the Los Angeles Civic Center Shared Facilities and Enhancement Plan, which calls for the extension of the park to Los Angeles’ City Hall, the No Project “B”

Alternative with regard to the Civic Park would be less environmentally advantageous in relation to land use plans and policies than the Project.

(b) Grand Avenue Streetscape

Under the No Project “B” Alternative, the Grand Avenue streetscape program would be implemented only in front of Parcel Q. Conceptual streetscape improvements, including street trees and pedestrian lights, along the west side of Grand Avenue, or north and south of Parcel Q would not be added. Some of these areas that are currently devoid of landscaping and visual interest would not be upgraded. With the highly reduced improvements to the Grand Avenue streetscape, the No Project “B” Alternative would not promote Grand Avenue as an important and attractive street. The No Project “B” Alternative would support or encourage greater pedestrian activity or support the vision of the City as a pedestrian-safe 24-hour city to a considerably lesser degree than the Project. Although the No Project “B” Alternative would not generate any significant land use impacts, it would not support existing plans and policies to the same degree as the Project, and thus, would be less environmentally advantageous than the Project.

(c) Parcels Q, W-1/W-2, L, and M-2

The No Project “B” Alternative would be developed according to the existing zoning and the 1991 OPA. Parcels L and M-2 would be developed per the underlying R5-4D zone and Parcel W-1 would be developed according to the underlying R5-4D and C2-4D zones. With regard to Parcel W-1, residential zoning is located in the central portion of the parcel, with commercial zoning fronting Hill Street. Table 95 on page 769, summarizes the land uses that would be permitted under the existing zoning. As shown in Table 95, the existing residential zoning on Parcels L and M-2 would allow the development of 659 residential units, including 132 affordable units. Existing zoning on Parcel W-1 would allow the development of 184 residential units, 37 of which would be affordable, and approximately 162,678 sq. ft. of commercial floor area. For the purpose of this analysis, it is assumed that the proportion of Parcel W-1 development that is office and retail development matches that of the Project. As a result 148,037 square feet of office uses and 14,641 square feet of retail uses would be developed. Under Alternative 2, a total of 843 residential units, including 169 affordable units would be developed. Parcels Q and W-1 would be developed according to the 1991 OPA, which allows the development of office and retail uses on Parcel Q and 400 surface parking spaces on Parcel W-2. Under this Alternative, Parcel Q would be developed with 1,417,755 square feet of office floor area and 50,000 square feet of retail floor area. Total office floor area for the No Project “B” Alternative would be 1,565,792 square feet, while total retail floor area would be 64,641 square feet.

Table 95

**Alternative 2 – No Project “B”
Existing Zoning and OPA Land Uses**

	Existing Zoning		Existing OPA		Total Uses
	Parcels L and M-2	Parcel W-1	Parcel Q	Parcel W-2	
Total Land Area	97,574.4 sq. ft.	54,226 sq. ft.	139,827.6 sq. ft.	93,878 sq. ft.	
C2 Zone (percentage of lot area)	0	50 percent			
Area Zoned C2	0 sq. ft.	27,113 sq. ft.			
Total Commercial Floor Area	0	Office: 148,037 sq. ft. Retail: 14,641 sq. ft.	Office: 1,467,755 sq. ft. Retail: 50,000 sq. ft.	0	Office: 1,615,792 sq. ft. Retail: 64,641 sq. ft.
Total Commercial Floor Area	0	162,678 sq. ft.	1,385,755 sq. ft.	0	1,680,433 sq. ft.
R5 Zone (percentage of lot area)	100 percent	50 percent			
Area Zoned R5	97,574.4 sq. ft.	27,113 sq. ft.			
Allowed Residential Units	488 units	136 units	0	0	600 units
Affordable Unit Bonus (35 percent)	171 units	48 units	0	0	210 units
Total Residential Units	659 units	184 units	0	0	843 units
Affordable Units	132 units	37 units			169 units
Surface Parking	0	0	0	400 spaces	400 spaces

Source: PCR Services Corporation, 2006

The No Project “B” Alternative would meet the objectives of the Downtown Center designation of the General Plan Framework in that it would locate new development in centers and near transportation nodes. However, since the No Project “B” Alternative would represent an approximate 59 percent reduction in total housing units and affordable housing compared to the County Office Building Option, it would be less consistent with the housing policies of the General Plan Framework and the intent of the Central City Community Plan to increase housing choices to downtown employees and to foster residential development that can accommodate a range of incomes. The No Project “B” Alternative would also be less consistent with the intent of SCAG’s Regional Comprehensive Plan and Guide to increase residential densities in jobs-rich areas and transportation hubs. The No Project “B” Alternative would be consistent with the intent of the Bunker Hill Design for Development to redevelop underutilized sites, although to a lesser degree than the Project since Parcel W-2 would remain underutilized. The No Project “B” Alternative would have approximately 85.6 percent less retail floor area than the Project and, as such, would be less consistent with the policies of the Downtown Strategic Plan to foster public/private partnerships to bring activity generators, such as retail, entertainment, housing and

support systems to downtown Los Angeles. With less retail floor area, the No Project “B” Alternative would also be less supportive of the Downtown Strategic Plan’s policy to provide services to surrounding residential uses and downtown visitors. As with the Project with County Office Building Option, the No Project “B” Alternative would not generate any significant land use compatibility impacts since it would be located in an area characterized by a variety of land uses, including commercial high-rise development. The No Project “B” Alternative would also be consistent with the existing zoning designations, although a variance may be needed for Parcel Q to allow the proposed office use in the existing R5 portion of Parcel Q. However, since the No Project “B” Alternative would be less supportive of the intent of existing land use plans and policies to create a greater variety of mixed use, including retail use and housing in the downtown area, it would have a greater land use impact than the Project with County Office Building Option in relation to adopted land use plans. . Therefore, with the balance of zoning impacts under the Project and land use impacts associated with adopted plans under the No Project “B” Alternative, the degree of land use impact of the Project and the No Project “B” Alternative are considered to be similar.

(2) Transportation, Circulation, and Parking

(a) Construction

Construction activities associated with development would be considerably less than under the Project, since no construction would occur in Parcel W-2, or within the Civic Center Mall, and the Grand Avenue Streetscape Program would only be implemented adjacent to Parcel Q. Potentially significant construction traffic impacts associated with the alternating closures of the Civic Mall parking structure ramps on Hill Street and Grand Avenue would not occur since the development and improvements in the Civic Mall would not occur. However, the construction of the No Project “B” Alternative, as with the Project with the County Office Building Option, would generate worker parking, haul truck traffic, and emergency access impacts due to street disruption. . The highest periods of truck activity would in the initial months of construction for each Parcel(s), and would be similar to the Project and, as such, would generate an average of approximately 130 trucks a day to a peak of 300 trucks a day. Although activity would be of shorter duration than the Project, short-term significant traffic impacts due to the volume of haul trucks during the A.M. peak hour would be expected, as under the Project. Street disruption would be incrementally less than the Project since no construction of utility connection lines from Parcel W-2 would occur, although the construction of utility connection lines from Parcels W-1, L, M-2, and Q and the construction of the Second Street tunnel would still occur. Excavation within Parcels W-1, L, M-2, and Q would be similar to the Project, since parking would be subterranean. Under the No Project “B” Alternative, less time would be required for the construction of exterior walls, sheathing, and completion of interiors in Parcels W-1/W-2, L, and M-2. It is also expected that the overlapping of construction activities

would be less under the No Project “B” Alternative, because the phases of construction could be completed in less time. Both the Project with County Office Building Option and this Alternative would be required to implement a Construction Traffic Control/Management Plan, which would reduce, but not eliminate, potentially significant short-term construction traffic impacts associated with haul trucks during the A.M. peak hour. The No Project “B” Alternative would result in incrementally decreased construction activities and associated construction traffic impacts and would avoid the short-term, potentially significant traffic impact associated with the periodic closure of the ramps to the Civic Center Mall garage during their relocation.

(b) Traffic and Circulation

As shown in the traffic volumes presented in Table 96 on page 772, the No Project “B” Alternative would generate 15 percent fewer A.M. peak hour trips and 36 percent fewer P.M. peak hour trips than the Project with County Office Building Option. Overall, the No Project “B” Alternative would generate fewer significant traffic impacts in both peak hours compared to the Project with County Office Building Option (which has a higher trip generation rate than the Project with Additional Residential Option). However, since the number of trips in the peak directions would be very similar to the Project, the reduction in the number of impacts would be relatively small. Table 11-2 in the Mobility Group and FPL & Associates Traffic Study shows trip generation by parcel and by land uses, with detailed trip generation calculations shown in the Mobility Group and FPL & Associates Traffic Study Appendix C, contained in Appendix B of this Draft EIR.

It is likely that No Project “B” Alternative would not create CMP and freeway impacts, because the number of P.M. peak hour trips would be less than the Project, and the CMP/freeway impacts of the Project with County Office Building Option discussed in Draft EIR Section IV.B were only marginally above the threshold of significance. The No Project “B” Alternative would avoid the Project with County Office Building Option’s potentially significant short-term traffic congestion associated with large festivals and other special events in the Civic Park.

(c) Transit

Estimated transit ridership is based on a small percentage of projected vehicle trips. On this basis, the No Project “B” Alternative would generate fewer A.M. and P.M. peak hour transit riders than the Project with the County Office Building Option. As with the Project with the County Office Building Option, the No Project “B” Alternative would have a less than significant impact on transit capacity. However, since the No Project “B” Alternative would have less demand during the P.M. peak hour than the Project, it would have less impact on transit.

Table 96

Comparison of Peak Hour Trips - No Project "B" Alternative

A.M. Peak Hour Trips			No Project "B" Alternative		
Project with County Office Building Option			No Project "B" Alternative		
In	Out	Total	In	Out	Total
919	632	1,551	992	334	1,326
P.M. Peak Hour Trips			No Project "B" Alternative		
Project with County Office Building Option			No Project "B" Alternative		
1,120	1,344	2,464	460	1,123	1,583

Source: *The Mobility Group and FPL & Associates, 2006*

(d) Parking

The No Project "B" Alternative would provide code-required parking, as would the Project with County Office Building Option. As with the Project, the No Project "B" Alternative would require the removal of 1,567 existing parking spaces located within Parcels Q, W-1, L, and M-2 and 385 existing parking spaces located in the Civic Center Mall surface parking lot. In addition, 33 on-street parking spaces would be removed, as under the Project with County Office Building Option.

Compared to the Project with County Office Building Option, which would require 5,413 parking spaces under the LAMC commercial parking requirements and the DAARP residential parking requirements, the No Project "B" Alternative would require 3,316 spaces under these same requirements. Under the LAMC parking requirements for residential and commercial uses, the County Office Building Option would require 3,377 spaces, and the No Project "B" Alternative would require 2,484 spaces. A summary of parking requirements is presented in Table 11-4 in the Mobility Group and FPL and Associates Traffic Study presented in Appendix B of this Draft EIR.

As with the Project with County Office Building Option, the No Project "B" Alternative would not be consistent with the DAARP requirement of 2.5 spaces per dwelling unit and, as such, would be potentially significant in terms of this policy. Since the No Project "B" Alternative would not provide 2.5 spaces per dwelling unit, parking impacts would be similar to the Project with County Office Building Option, since this Alternative would not avoid the Project's potentially significant impact relative to the DAARP residential parking requirements. This Alternative would seek a variance/deviation from the Deputy Advisory Agency Policy for condominium parking supply, as described for the Project in Section IV.B of this Draft EIR.

Peak parking demand for the No Project “B” Alternative, as shown in Table 97 on page 774, would be approximately 10 percent higher than under the Project with County Office Building Option during the weekday daytime. This is due to the large amount of office floor area under this Alternative. However, parking demand for the No Project “B” Alternative would be much lower than the Project during evenings and weekends, since the parking demand for the office building in this Alternative would be substantially reduced during off-peak times. Under the No Project “B” Alternative, parking could be shared; whereas, the parking for the County Office Building in the Project with County Office Building Option could not be shared and would be 24-hour dedicated parking.

Under the No Project “B” Alternative, approximately 3,015 spaces of the peak weekday daytime demand of 3,122 spaces would be for the private office buildings. If LAMC required parking only were provided onsite for the office uses (1,565 spaces), then up to 1,450 spaces would be needed in offsite locations. This could cause a significant parking impact under this Alternative. Changes to the existing parking supply in the area would be similar to the Project with County Office Building Option as Parcels Q, W-1, L, and M-2 would be developed, although there would be no changes to the parking supply in the Civic Mall as the Conceptual Plan would not be implemented. As with the Project with County Office Building Option, there would be no significant impacts from changes to the existing off- and on-street parking supply under this Alternative.

(3) Aesthetics

(a) Visual Quality

Construction activities associated with the No Project “B” Alternative would result in similar visual contrast and general disruption in the aesthetic character of the area as caused by construction of a 1.57 million square feet of offices in Parcel Q and construction of residential high-rises in Parcels W-1, L and M-2. No changes would occur in Parcel W-2. The potential disruption of the Grand Avenue sidewalks would be less than under the Project with County Office Building Option, since streetscape improvements would only occur along Parcel Q. Although construction activities would reduce the existing visual attributes of Parcels Q, W-1, L, and M-2 during the construction phases, these parcels do not currently contain any aesthetic features that contribute to the existing visual character of the area. With mitigation, construction activities associated with the No Project “B” Alternative, as with the Project, would not substantially alter, degrade, or eliminate the existing visual character of the area. Visual Quality impacts associated with construction would be similar and less than significant under both the Project with County Office Building Option and the No Project “B” Alternative.

Table 97

Peak Commercial Parking Demands Comparison – No Project “B” Alternative

Period	Parcel Q		Parcel W-1/W-2		Parcels L and M-2		Total	
	Project with County Office Building Option	No Project “B” Alternative	Project with County Office Building Option	No Project “B” Alternative	Project with County Office Building Option	No Project “B” Alternative	Project with County Office Building Option	No Project “B” Alternative
Weekday								
Day	753	2,813	1,835	309	238	0	2,826	3,122
Eve	982	730	1,845	88	254	0	3,081	818
Weekend								
Day	900	574	1,866	79	279	0	3,045	653
Eve	1,013	208	1,855	33	270	0	3,136	241

Source: *The Mobility Group and FPL & Associates, 2006*

The No Project “B” Alternative would have approximately 85 percent less retail floor area than the Project with County Office Building Option, and would contribute less to the visual quality and activity of the streetscape environment than the Project. Under the No Project “B” Alternative, the high-rise development in Parcel Q would be consistent with the Bunker Hill Design for Development, which recommends construction of the highest buildings at the crest of Bunker Hill. However, the lack of development on Parcel W-2, other than the parking facility, and the reduced building heights on Parcels W-1, L, and M-2 would not characterize the tall buildings symbolic of a burgeoning downtown, in accordance with the Bunker Hill Design for Development. As such, the No Project “B” Alternative would be less consistent with existing Design for Development visual design policies than the Project. Although both the No Project “B” Alternative and the Project with County Office Building Option would have less than significant visual quality impacts, the No Project “B” Alternative would be less environmentally advantageous in relation to the visual quality of the Project site and the downtown area.

(b) Views

The No Project “B” Alternative would result in the construction of lower buildings on Parcels W-1, L, and M-2 than the Project with County Office Building Option, while no view-blocking development would occur on Parcel W-2. Buildings in Parcels W-1, L, and M-2 would likely be reduced in height compared to the Project since these would contain only a fraction of the number of residential units that would be developed under the Project with County Office Building Option. For instance, under this Alternative, Parcels L and M-2 would be developed with 488 residential units; whereas, under the Project with County Office Building Option, Parcels L and M-2 would be developed with 850 residential units. Residential buildings in Parcels L and M-2 have the potential to reduce the view blockage of the Walt Disney Concert Hall and the horizon and/or mountains from the Grand Promenade Tower, a 28-story residential high-rise located just south of Parcel M-2, the residential buildings would still be high-rise in nature and would not entirely eliminate or avoid view blockage. Development in Parcel Q would potentially be higher than the Project with County Office Building Option’s approximately 50-story hotel and would also block views of the mountains or horizon from the upper floors of the Museum Tower residential building. However, the No Project “B” Alternative would only partially block views of City Hall from the Olive Street sidewalk, since no development would occur on Parcel W-2. The No Project “B” Alternative would have less view impact than the Project, since it would reduce the potentially significant view impacts from Olive Street and the Grand Promenade Tower. However, it would not avoid the Project with County Office Building Option’s potentially significant view obstruction impacts on the Museum Tower residential high-rises.

(c) Light and Glare

The No Project “B” Alternative would have less light and glare impact than the Project with County Office Building Option, since ambient light associated with spillage from building windows would be incrementally less. Since retail uses would be reduced, illuminated signage associated with retail uses along the street fronts would also be less. Any new street or pedestrian lights along portions of Grand Avenue north and south of Parcel Q would not be installed and no new security lighting or special events lighting in the existing Civic Center Mall would occur. As with the Project with County Office Building Option, buildings associated with the No Project “B” Alternative could result in potential glare impacts from reflected sunlight. As with the Project, mitigation in the form of site-plan review, careful use of non-reflective surface materials, and a glare analysis prior to construction would reduce potential glare impacts to a less than significant level. Since exterior light and glare impacts occur primarily at the street level, the light and glare effects of the No Project “B” Alternative, and the Project with County Office Building Option would be similar. When compared with the Project, no reduction in the potential reflected sunlight impact would occur as a result of the No Project “B” Alternative. However, since signage, lighting in the park, and street lights would be considerably reduced compared to the Project with County Office Building Option, this Alternative would be more environmentally advantageous than the Project in relation to artificial light and glare.

(d) Shade/Shadow

The No Project “B” Alternative would incrementally reduce the heights of the Project with County Office Building Option’s towers on Parcels L, M-2, and W-1 and eliminate the Project’s towers on Parcel W-2. As building heights would be reduced under this Alternative compared to the Project, shading under this Alternative would be incrementally less on sensitive uses since there would be fewer tall buildings under this Alternative. Notwithstanding, shade/shadow impacts would be less than significant under both the Project and the No Project “B” Alternative. However, because the No Project “B” Alternative would generate shorter and fewer shadows, the No Project “B” Alternative would be environmentally advantageous in relation to shade/shadow effects.

(4) Historical Resources

The change in development on Parcels Q, W-1/W-2, L, and M-2 under the No Project “B” Alternative would have no effect on the Project’s potential historic impacts as Project development on these parcels has no effect on historic resources.

The Project’s Grand Avenue streetscape improvement program would be reduced to only occur along the frontage of Parcel Q. As a result, the potential impacts of the No Project “B”

Alternative would be substantially reduced and limited to the Walt Disney Concert Hall as it is the only identified potentially affected resource that could be affected by implementing the streetscape program under this Alternative (i.e., streetscape improvements only in front of Parcel Q). However, with the application of the mitigation measure identified for the Project, this impact would be reduced to a less than significant level. As such, the No Project “B” Alternative would reduce the scope of potential impacts on existing and potentially eligible cultural and historical resources when compared to the Project, but with the application of the mitigation measures identified for the Project, impacts of the streetscape improvements under the No Project “B” Alternative, as is the case with the Project, would be less than significant.

The Project’s Civic Park would not be implemented under the No Project “B” Alternative. Thus, no impact to the existing resources within the Civic Center Mall, which is potentially eligible for listing in the California Register, would occur. Therefore, this Alternative would avoid the Project’s potentially significant impact on historic resources associated with the Civic Park.

(5) Population, Housing and Employment

Under the No Project “B” Alternative, there would be reductions in the amount of housing and population in the Project area, and an increase in the amount of employment, as compared to the Project with County Office Building Option. As shown in Table 98 on page 778, there would be 843 housing units, with a population of 1,197, representing only 40 percent of the Project population under the Project with County Office Building Option. The number of affordable units under the Alternative when compared to the Project would be decreased from 412 units to 169 units. While residential development would be reduced, the number of employees under the No Project “B” Alternative would be 6,392 employees in contrast to the 3,930 employees under the Project with County Office Building Option, an increase of 63 percent. The decreases in population, and housing would represent slightly reduced amounts of the expected growth in the City of Los Angeles Subregion over that of the Project’s. With regard to the City of Los Angeles Subregion, the population under the No Project “B” Alternative would be 0.7 percent of the growth (in contrast to the 1.7 percent under the Project with County Office Building Option), and the number of households would be 0.7 percent (in contrast to the 1.8 percent under the Project with County Office Building Option). In contrast, the number of employees under the No Project “B” Alternative would be 2.72 percent of the expected employment growth (in contrast to 1.8 percent under the Project with County Office Building Option). As was the case with the Project this projected growth constitutes a relatively small proportion of the overall growth forecasted for the City of Los Angeles Subregion. As is the case with the Project, population, housing and employment growth attributable to the No Project “B” Alternative would not exceed subregional growth forecasts; and, thus, impacts regarding

Table 98

Alternative 2 - Population and Employment**Population**

Total Housing Units	843
Average Household Size	1.42 ^a
Total Population ^b	1,197

	<u>Proposed</u>	<u>Factor^c</u>	<u>Total Employment</u>
<u>Employment</u>			
Retail	64,641 sq.ft.	500 sq.ft./employee	129
Office	1,565,792 sq.ft.	250 sq.ft./employee	6,263
Total			6,392

^a Household size is based on the 2004 household size for the Project's Census Tract.

^b Assumes 100 percent occupancy.

^c Based on data provided in the Institute of Transportation Engineers, Sixth Edition, 1997.

Source: PCR Services Corporation, July 2003.

growth would be less than significant. At the Subregional level, impacts of the No Project "B" Alternative and the Project would be similar and less than significant.

The No Project "B" Alternative would be less advantageous than the Project with Additional Residential Development Option in meeting the adopted plans and policies to create high-density residential uses, affordable housing, and increased pedestrian presence in the downtown, since it would generate a fraction of the Project's residential units of either of these Options. . Nonetheless, numerous policies would be supported, albeit to a lesser extent, by the No Project "B" Alternative. These include policies that encourage (1) increases in the housing stock and the availability of affordable units, (2) placement of housing in the jobs-rich downtown area, (3) placement of housing at the hub of transportation, public transportation and pedestrian route opportunities, and (4) the creation of employment opportunities, with increased vibrancy in the downtown area. However, the No Project "B" Alternative would not include the same housing benefits, mixed-use contributions and vibrancy as the Project. Further, it would add a disproportionate amount of new office space, encouraging the downtown area's role as a work place, rather than a 24-hour mixed-use activity center. Notwithstanding, the No Project "B" Alternative would support numerous policies and would, therefore, not be considered to be in conflict with applicable land use plans and policies. Therefore, the impacts of the No Project "B" Alternative on plan consistency, similar to the Project, would be less than significant. While not significant, impacts of the No Project "B" Alternative on population, housing, and employment would be greater (i.e., less advantageous) than those of the Project.

(6) Air Quality

Construction activities associated with development would be considerably less than under the Project, since no construction would occur in Parcel W-2, or within the Civic Center Mall, and the Grand Avenue Streetscape Program would only be implemented adjacent to Parcel Q. As with the Project with County Office Building Option, construction of the No Project “B” Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be less under the No Project “B” alternative compared to the proposed Project with County Office Building Option. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could decrease compared to the proposed Project with County Office Building Option. The construction emissions generated by the No Project “B” Alternative would be less than those of the proposed Project with County Office Building Option over the construction period. However, impacts during maximum conditions, those used for measuring significance, would be similar to those of the proposed Project and would be significant under the No Project “B” Alternative for regional construction emissions. Localized pollutant construction impacts would also be similar to the proposed Project with County Office Building Option as both the intensity and duration of excavation and grading would be similar, and would also be significant.

The number of daily trips generated by this Alternative (12,427 ADT) would be 45 percent less than under the Project with County Office Building Option (22,601 ADT), resulting in proportionate decreases in mobile air quality emissions. The total contribution to regional emissions under this Alternative would be significant, as is the case with the Project with County Office Building Option. Although, this Alternative would result in significant regional air quality impacts for CO, NO_x, VOC, and PM₁₀, emissions would be incrementally reduced when compared to more of the Project with County Office Building Option. Localized air quality impacts are determined mainly by the peak hour intersection traffic volumes. Compared to the proposed Project with County Office Building Option, this Alternative is forecasted to generate approximately 15 percent fewer trips during the A.M. peak hour compared and 36 percent fewer trips during the P.M. peak hour. Since the localized CO hotspot analysis for the proposed Project did not result in any significant impacts, this Alternative would likewise not have any localized impacts due to fewer trips generated.

With respect to potential air toxic impacts, this Alternative would avoid locating sensitive receptors within siting distances identified by SCAQMD and ARB guidelines. Thus, similar to the proposed Project with County Office Building Option, this Alternative would result in a less than significant air quality impact related to air toxics. In summary, air quality impacts under

this Alternative would be less than with the Project, but as with the Project would be significant for both construction and operations air quality impacts.

(7) Noise

Construction activities associated with development would be considerably less than under the Project with County Office Building Option, since no construction would occur in Parcel W-2, or within the Civic Center Mall, and the Grand Avenue Streetscape Program would only be implemented adjacent to Parcel Q. Because the type of construction associated with Alternative 3 would be similar to the proposed Project, daily construction-related noise levels experienced both within the Project site and the immediate vicinity would be similar to the proposed Project with County Office Building Option and are considered significant. However, fewer noise sensitive receptors would be impacted due to the reduced scope of this Alternative. In addition, there would be fewer days of construction activity associated with this Alternative since less area would be developed.

The No Project “B” Alternative would also result in a reduction in noise levels associated with operational on-site equipment and activity. The on-site equipment and activity noise levels associated with the Project are not considered significant and would be less so with this Alternative. In addition, noise from proposed outdoor shows and events associated with the proposed Project Civic Center Mall would be avoided with this Alternative. An expected reduction of 45 percent in daily traffic volumes associated with this Alternative would yield a slight reduction in comparison to the Project with County Office Building Option’s traffic noise. As with the proposed Project with County Office Building Option this Alternative would result in a less than significant roadway noise impact.

(8) Hazardous Materials

The No Project “B” Alternative, with the exception of Parcel W-2, would require a similar amount of site preparation as the Project with County Office Building Option. Potential exposure to previously unrecorded hazardous materials would be the same under both the Project and the No Project “B” Alternative. However, fill soils that may contain hazardous materials would not be removed from Parcel W-2. Although potential exposure to fill soils in Parcel W-2 would not occur, no materials would be removed and, therefore, any potentially hazardous soils would not be removed. As with the Project with County Office Building Option, mitigation measures would reduce potentially significant impacts to less than significant levels for Parcels Q, W-1, L, and M-2. However, since any potentially hazardous fill soils would not be removed from Parcel W-2, impacts associated with hazardous materials would be incrementally greater under the No Project “B” Alternative.

(9) Public Services**(a) Fire Services**

The development program for the No Project “B” Alternative would be similar to that of the Project and therefore construction activity would have similar effects regarding the chance of construction related incidents requiring emergency response, and impacts on emergency access due to lane closures for construction.

Operating characteristics with regard to fire services for this Alternative would also be similar to those of the Project. As is the case with the Project, sufficient fire facilities are located within the specified regulatory distances, and the development would be required to provide fire flows, and site/building design to meet standards for fire protection, thus avoiding significant impacts. Impacts of the No Project “B” Alternative would be similar to those of the Project and would be less than significant.

(b) Police

The development program for the No Project “B” Alternative would be similar to that of the Project and therefore construction activity would have similar effects regarding the chance of construction related thefts, and impacts on emergency access due to lane closures for construction.

The No Project “B” Alternative would introduce a new population to the Project site with 1,197 new residents and 6,457 commercially related persons, for a total of 7,654. This would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 153 residents. There would be an estimated increase in crimes of 1,179 cases per year, or 3.5 additional crimes that would be handled by each officer per year.

Operations under the Project with County Office Building Option would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 192 persons. There would be an estimated increase in crimes of 1,153 cases, or 3.4 more crimes for each officer per year. With private security, especially for park activities, and mitigation measures for site safety and protection, impacts for this Alternative as well as the Project would be less than significant. Therefore service ratios under the No Project “B” Alternative would be roughly similar to those of the Project with County Office Building Option. As such, impacts under the Project and the No Project “B” Alternative would be less than significant.

(c) Schools

The student generation for the No Project “B” Alternative is shown in Table 99 on page 783. As indicated, this Alternative would generate a total of 342 students, with 112 elementary school students, 88 middle school students and 142 high school students attending local schools. In contrast, the Project with Additional Residential Development Option would generate 632 local LAUSD students, consisting of 314 elementary school students, 157 middle school students, and 161 high school students. The No Project “B” Alternative represents a reduction of 290 students, or approximately 46 percent less than the 632 students generated by the Project with Additional Residential Development Option.

The analysis of the Project with Additional Residential Development Option impacts indicates that students would exceed anticipated seating capacity at Castelar and Gatts Elementary Schools, even after the development of new schools in the area. The Project with Additional Residential Development Option’s students would not exceed the capacity of the middle school and high school facilities with increased capacity that would be made available through planned new schools that will be open by 2009. Nevertheless, Project impacts would be mitigated through the payment of fees for new schools per California Government Code Section 65995. Thus, impacts of the Project would be less than significant.

Impacts of the No Project “B” Alternative would be less than those of the Project with Additional Residential Development Option, reducing the effects on the seating shortage at the elementary schools. However, this reduction would not result in an avoidance of the potentially significant impact on the elementary schools, since they would have a seating shortage, after the construction of new facilities, without any additional students from the Project. The increase in students at the middle school and high school levels would fall within the estimated seating capacity that would occur with the development of the new schools. As was the case with the Project, impacts of the No Project “B” Alternative would be mitigated through the payment of developer fees. With the payment of these fees, impacts of the No Project “B” Alternative, as is the case with the Project Additional Residential Development Option, would be less than significant.

(d) Parks and Recreation

The No Project “B” Alternative does not include improvements to the existing Civic Center Mall and, as a result, this alternative would avoid the Project’s potentially significant, short-term impact on park and recreation facilities that are presently available within in the Civic Center Mall.

Table 99

Alternative 2 - Estimated Student Generation

A. Residential Component*Condominium Units*

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.0867	674	58
Middle	0.0434	674	29
High	0.0438	674	<u>30</u>
Total Students (Single-Family Attached)			117

Multi-Family Units

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.2396	169	40
Middle	0.107	169	18
High	0.0933	169	<u>16</u>
Total Students (Multi-Family)			74

B. Commercial Component

School Level	Student Generation Rates ^c	Total Number of Employees	percent of Employees within Boundaries	Forecasted Student Generation ^b
Elementary	0.106	6,392	.02	14
Middle	0.049	6,392	.13	41
High	0.060	6,392	.25	<u>96</u>
Total Students (Commercial Component)				151

C. Combined Total from Residential and Commercial

	Elementary	Middle	High	Total
Total Students Generated (Residential and Commercial: Within Attendance Boundaries)	112	88	142	342

^a LAUSD Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004^b Number of Students rounded to the nearest whole number.^c Based on rates generated by LAUSD.

Source: PCR Services Corporation.

The No Project "B" Alternative would generate 843 new housing units, with an additional population of 1,197 residents at the Project site. The new population would seek out recreational opportunities and increase the demand for park and recreation services. In contrast, the Project with Additional Residential Development Option would generate 3,777 residents. The analysis of the Project's impacts on park space addresses the additional demand on park space that would be generated by the Project's added population, pursuant to the City methods

for analyzing and providing new park space for City residents. The analysis recognizes that the Project would be required to meet the City's Quimby requirements through the provision of dedicated park space at a rate of 3 acres per 1,000 population, payment of in-lieu fees, or a combination of the two. The No Project "B" Alternative, with fewer dwelling units, would provide a lesser contribution to park facilities. In all of these cases, the contributions to the City's park facilities are provided on a per capita base and are therefore equivalent in regard to their respective populations. As such, both the No Project "B" Alternative and the Project would accommodate their respective additional park demands, and avoid a potentially significant impact on parks and recreation services.

The No Project "B" Alternative would not include improvement to Civic Park. Therefore, a parks benefit of the Project would not be realized under this Alternative and operational impacts would be less advantageous than those of the Project.

(e) Libraries

The No Project "B" Alternative would generate 843 new housing units, with an additional population of 1,197 residents at the Project site. The added population would make use of nearby libraries, and increase the demand for library services. In addition, its employees might also use the downtown Central Library, a regional facility, and/or other nearby libraries.

In contrast, the Project with Additional Residential Development Option would generate 3,777 residents as well as employees, hotel patrons, visitors and tourists who might use the local library facilities. The Project's additional population is not expected to exceed the libraries' defined target service population, nor require library expansion. Therefore, Project impacts would be less than significant. The No Project "B" Alternative would incrementally reduce demand for library services compared to the Project's less than significant demand on library services. Therefore, under the No Project "B" Alternative, demand for library services would be less than significant and less than under the Project.

(10) Utilities

(a) Water Supply

Construction of the No Project "B" Alternative would require hook-ups to the existing water main lines that are similar to those of the Project. The installation of these hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. Water would be used during construction for dust suppression and other construction-related activities. Such water usage would be intermittent, temporary, and less than that of the completed development. Impacts on water supply during construction would be

somewhat similar and less than significant under the Project as well as the No Project “B” Alternative.

The estimated net water demand for the Project with County Office Building Option is ,844,403 gallons per day on average, and 1,435,484 gallons on a peak day. Water infrastructure and water supply is sufficient to meet these demands, as well as requirements for fire flow. Therefore, these impacts would be less than significant.

The No Project “B” Alternative would have 843 housing units, 59 percent less than the Project with County Office Building Option. It would have 64,641 square feet of retail development, 85.6 percent less than that Option, and 1,565,792 square feet of office space, an increase of 129.9 percent. These uses together would require less water consumption than the Project’s developed uses. Water consumption for the streetscape program would be similar to that of the Project. Under the No Project “B” Alternative, there would be no new improvements to the Civic Mall and therefore no incremental change in water demand for that land use. The total water consumption for the No Project “B” Alternative is shown in Table 100 on page 786. As indicated therein, water consumption under the No Project “B” Alternative would be 538,685 gallons on an average day and 915,765 gallons on a peak day. Impacts of the No Project “B” Alternative on water consumption would be 36 percent less than those of the Project with County Office Building Option as Project impacts of the No Project “B” Alternative would also be less than significant as less water is consumer under this Alternative and the water infrastructure can handle the higher volumes and fire flow requirements of the Project.

(b) Wastewater

Construction of the No Project “B” Alternative would require hook-ups to the sewer lines that are similar to those of the Project. These hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. It is anticipated that portable toilets would be provided and maintained by a private, contracted vendor during the construction phase of the Project, and that the vendor would dispose of waste off-site. Therefore, wastewater generation during construction would be negligible. Impacts of the No Project “B” Alternative on wastewater generation during construction would be somewhat similar to those of the Project and, thus, less than significant.

The No Project “B” Alternative includes 843 housing units, 59 percent less than the Project with County Office Building Option. It would have 64,641 sq. ft of retail development, 85.6% less than the Project with County Office Building Option, and 1,565,792 sq. ft. of office space, an increase of 129.9%. These uses would generate less wastewater than the Project’s developed uses. Under the No Project “B” Alternative, there would be no new improvements to the Civic Mall and therefore no incremental change in wastewater generation for that land use.

Table 100

Alternative 2 - Anticipated Water Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
Commercial						
Retail	64,641	square feet	80	5,171	136	8,791
Office	1,565,792	square feet	180	281,843	306	479,132
<i>Subtotal</i>				<u>287,014</u>		<u>487,924</u>
Outdoor Water Use (28% of Consumption)				80,364		136,619
Total Commercial				367,378		624,542
Residential						
1 bedroom	497	dwelling unit	120	59,640	204	101,388
2 bedroom	295	dwelling unit	160	47,200	272	80,240
3 bedroom	51	dwelling unit	200	10,200	340	17,340
<i>Subtotal</i>				<u>117,040</u>		<u>198,968</u>
Outdoor Water Use (18% of Consumption)				21,067		35,814
Parking^c	821	ksf	20	16,420	34	27,914
Total Residential				154,527		262,696
Streetscape^d	0.1	acres	3,650	365	6205	621
Park^e				16,415		27,914
Total				538,685		915,765

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses are expressed in terms of gpd per 1,000 square feet of floor area.

^b Water consumption factors multiplied by a maximum daily peaking factor of 1.7.

^c Total parking floor area based on the percentage reduction of code required parking under this Alternative and 325 square feet per parking space.

^d Based on a street frontage along Grand Avenue for Parcel Q of 450 linear feet and a planting strip that is 10 feet wide.

^e Based on existing water demand levels.

Source: PCR Services Corporation, 2006.

The total wastewater generation for the No Project “B” Alternative is shown in Table 101 on page 788. As indicated, the wastewater generation would be 405,254 gallons on an average day and 688,932 gallons on a peak day.

The estimated net wastewater generation for the Project with County Office Building Option is 631,650 gallons per day on average, and 1,073,805 gallons on a peak day. Wastewater infrastructure and capacity is sufficient to meet these demands. Therefore, these impacts would be less than significant.

Impacts of the No Project “B” Alternative on wastewater generation would be 36 percent less than those of the Project with County Office Building Option; and also would be similarly less than significant.

(c) Solid Waste

The No Project “B” Alternative would generate waste debris from construction activities. The debris from residential construction (4.38 lbs per sq.ft. and 822,768 square feet of construction) and commercial development (4.2 lbs per square foot and 1,630,433 square feet) would be 5,226 tons per year. This is less than the 7,800 tons that would be generated by the residential and commercial development for the Project with County Office Building Option. The amount of construction debris associated with street and park improvements, 23,232 tons, would not occur under this Alternative, substantially reducing the amount of construction debris.

The total amount of construction waste with this Alternative, 7,800 tons would be less than that of the Project with County Office Building Option’s 31,120 tons per year, by 75 percent. The amount of solid waste disposal required during operations of the No Project “B” Alternative is shown in Table 102 on page 789. As indicated, this Alternative would generate approximately 11,074 tons of solid waste per year, approximately 57 percent more than the Project’s 7,072 tons per year. The analysis of the Project’s solid waste impacts indicates that the inert that would accept the construction debris have an estimated 60 year capacity. Further, the Project’s solid waste due to operations would comprise less than 0.001 percent of the 9.11 million tons of total waste generated within the City of Los Angeles and disposed of daily at major landfills in the region, and planning for future needs is being based on a 15 year projected needs bases. Therefore, impacts of the Project on solid waste would be less than significant. Impacts of the No Project “B” Alternative would be less than that of the Project, and also would be less than significant.

Table 101**Alternative 2 - Anticipated Wastewater Demand**

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD)^a	Total (GPD)	Peak Consumption Rate (GPD)^b	Total (GPD)
Commercial						
Retail	64,641	square feet	80	5,171	136	8,791
Office	1,565,792	square feet	180	<u>281,843</u>	306	<u>479,132</u>
Total Commercial				287,014		487,924
Residential						
1 bedroom	497	dwelling unit	120	59,640	204	101,388
2 bedroom	295	dwelling unit	160	47,200	272	80,240
3 bedroom	51	dwelling unit	200	10,200	340	17,340
Total Residential				117,040		198,968
Park^c				1,200		2,040
Total				405,254		688,932

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses are expressed in terms of gpd per 1,000 square feet of floor area.

^b Water consumption factors multiplied by a maximum daily peaking factor of 1.7.

^c Based on existing sewage generation levels.

Source: PCR Services Corporation, 2006.

Table 102

Alternative 2 - Anticipated Solid Waste

Use Type	Amount of Development	Units	Employees ^b	Disposal Rate (tons/employee/year) ^a	Total (tons/year)
Commercial					
Retail	64,641	square feet	129	0.30	39
Office	1,565,792	square feet	6,263	1.70	<u>10,647</u>
Total Commercial					10,686
Residential	843	dwelling unit		0.46	388
Total					11,047

^a Disposal Waste rate calculations are based on CIWMB published units.

^b Derived from factors generated by PCR Services Corporation based on data presented in the Institute of Transportation Engineers, Trip Generation Manual.

Source: PCR Services Corporation

c. Relationship of No Project “B” Alternative to the Project Objectives

The No Project “B” Alternative would not meet the ultimate goal of the Project to provide an economically viable, community-oriented, mixed-use development. In addition, the No Project “B” Alternative would not meet any of the Project’s priority objectives. The No Project “B” Alternative would not meet the Project’s priority objective to establish Grand Avenue as a vibrant 24-hour urban place that activates the Civic and Cultural Center through a mix of uses that complement each other due to the substantial reduction of the Grand Avenue Streetscape Program, no development of street front retail uses along Parcels L and M-2, retaining Parcel W-2 as a surface parking lot, and the reduction of retail uses on Parcels Q and W-1. This Alternative would not meet the Project’s priority objective to generate at least \$50 million in funds from the Project itself, and at least \$45 million from Phase 1, by the lease of public land, and then using these funds to create the proposed Civic Park, nor implement the Grand Avenue Streetscape Program as envisioned. As such, it would not meet the Project objectives to create a civic gathering place and to enhance pedestrian connections.

This Alternative would also not meet the priority objective of the Project to implement redevelopment plan objectives to permit a maximum density of development, since this Alternative would not maximize density on Parcels W-1/W-2, L, and M.

Although the No Project “B” Alternative would meet the Project’s priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County, the magnitude of revenue generation would be substantially reduced under this Alternative, as

compared to the Project, since Parcels W-2/W-2, L and M-2 would not be developed to their full potential. Furthermore, this Alternative would meet the priority objective to ensure that 20 percent of all residential units are affordable, although it would contain only a fraction of the number of affordable units that would be generated by the proposed Project residential units.

The No Project “B” Alternative would reduce, but not avoid, the Project’s significant and unavoidable impacts associated with construction hauling, lane closures, intersection service levels (although it would incrementally reduce peak hour traffic), DAARP residential parking requirements, view obstruction, air quality (construction and operation), and noise (construction). It would be less beneficial than the Project in relation to the implementation of existing land use plans, which call for a greater mix of residential uses in the urban center and revitalization of the downtown. The No Project “B” Alternative would, however, avoid the Project’s potential significant impacts associated with zoning compliance, periodic closures of the Grand Avenue and Hill Street ramps to the Civic Center Mall during the reconstruction of the ramps, occasional traffic congestion during evening and large-scale events in the Civic Park, possible removal of historically significant character-defining features in the existing Civic Center Mall, and short-term recreational impacts associated with the closure of the existing Civic Center Mall during the construction of the Civic Park. The No Project “B” Alternative would also reduce the Project’s less than significant construction visual quality impacts since construction would be completed within a shorter time frame as there is a lesser amount of construction compared to the Project.

3. Alternative 3: Reduced Density

a. Introduction and Description of the Reduced Density Alternative

The Reduced Density Alternative represents a 25 percent reduction of proposed development within Parcels Q, W-1/W-2, L, and M-2. Under the Reduced Density Alternative, the Civic Park would be developed and the streetscape improvements implemented. However, the level of improvements made to the Civic Park and the extent of the streetscape improvements would be reduced commensurate with available funding. While the mix of office, retail and residential uses across the development Parcels under the Reduced Density Alternative would be the same as under the Project, the floor area associated with each use would be reduced by 25 percent. Thus, the Reduced Density Alternative would result in up to 1,545 residential units, of which 309 would be available as affordable units, 336,750 square feet of retail floor area, 206 hotel rooms, and a 510,750-square-foot County office building. In addition, under the Reduced Density Alternative, the maximum building heights would also be reduced by 25 percent. While the reduction in building height could occur through a number of different ways, for the purposes of analyzing the Reduced Density Alternative, building heights would be the same as under the Project, although the high-rise buildings would be reduced in height. The Reduced Density Alternative would partially meet the priority objectives of the Project to activate the Civic and

Cultural Center by generating activity through a mix of uses. However, it would not meet the goal of economic viability, or the priority objective of generating at least \$45 million from Phase 1 by lease of public land to improve and extend the existing Civic Center Mall into a County Park that can serve as a gathering place for the entire region. Nor, would this Alternative meet the priority objective to implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design. The components of the Reduced Density Alternative are compared to the Project with County Office Building Option in Table 103 on page 792. The components of the Reduced Density Alternative are compared to the Project and Alternatives 1, 2, 4, and 5 in Table 93.

b. Analysis of Alternatives

(1) Land Use

(a) Civic Park and Grand Avenue Streetscape

Improvements within the Civic Park and with the Grand Avenue streetscape program would be reduced in scope compared to the Project, commensurate with available funding, which is directly linked to the amount of development occurring within the five development parcels. As indicated in Table 93 on page 750, under this Alternative, an estimated \$34.3 million would be available in Phase 1 from lease revenues to fund the Civic Park. As such, the Reduced Density Alternative would be potentially less supportive of General Plan Framework and Central City Community Plan objectives to increase open space and recreation area than the Project. However, under this Alternative, the potential also exists for the Civic Park Conceptual Plans and Grand Avenue Streetscape to be implemented as under the Project. Nevertheless, since the potential remains that these Conceptual Plans would not be implemented to the same as extent as under the Project, the impact of this Alternative on land use plans is considered less consistent with open space policies of the adopted land use plans and less environmentally advantageous.

(b) Parcels Q, W-1/W-2, L, and M-2

Development of Parcels Q, W-1/W-2, L, and M-2 would represent a 25 percent reduction in floor area compared to the County Office Building Option. The mix of land uses, including office, retail, and residential uses would be the same as under the County Office Building Option, as would the configuration of proposed buildings, although building heights would be reduced proportionate to the 25 percent reduction in land uses under this Alternative. As with the Project, the Reduced Density Alternative would be compatible with surrounding residential, office, and cultural uses. As the 25 percent reduction would apply to floor area, floor area ratios would be reduced by 25 percent as well under this Alternative.

Table 103

Alternative 3
Comparison of the Project With County Office Building Option and the Reduced Density Alternative

Components	County Office Building Option	Alternative 3	Numerical Difference	Percent Change
Residential				
Parcel Q	500 units	375 units	- 125 units	25.0 percent decrease
Parcel W-1	710 units	533 units	- 177 units	24.9 percent decrease
Parcels L and M-2	850 units	637 units	- 213 units	25.0 percent decrease
Total residential units	2,060 units	1,545 units	- 515 units	25.0 percent decrease
Total affordable units	412 units	309 units	- 103 units	25.0 percent decrease
Total residential floor area	2,155,000 sq. ft.	1,616,250 sq. ft.	-538,750 sq. ft.	25.0 percent decrease
Total hotel rooms (Parcel Q)	275 rooms	206 rooms	-69 rooms	25.0 percent decrease
Total hotel floor area:	315,000 sq. ft.	236,250 sq. ft.	- 78,750 sq. ft.	25.0 percent decrease
Total retail floor area (all parcels)	449,000 sq. ft.	336,750 sq. ft.	- 112,250 sq. ft.	25.0 percent decrease
Total office floor area (Parcel W-2)	681,000 sq. ft.	510,750 sq. ft.	- 170,250 sq. ft.	25.0 percent decrease
Total Floor Area	3,600,000 sq. ft.	2,700,000 sq. ft.	-900,000 sq. ft.	25.0 percent decrease
Conceptual Civic Park Plan	16 acres	16 acres	0	No change in area but reduced funding level for improvements
Grand Avenue Streetscape Plan	Fifth St. to Cesar E. Chavez Ave.	Fifth St. to Cesar E. Chavez Ave.	0	No change in location but reduced funding level for improvements

Source: PCR Services Corporation, April 2006

As with the Project, the Reduced Density Alternative would meet the objectives of the Downtown Center designation of the General Plan Framework, the housing policies of the General Plan Framework, the intent of the General Plan Framework to locate new development in regional centers and near transportation nodes. The Reduced Density Alternative would meet the objective of the Central City Community Plan to increase housing choices to downtown employees and to foster residential development that can accommodate a range of incomes. However, the Reduced Density Alternative would be less consistent with the Community Plan's housing policies than the Project with County Office Building Option, in that total residential and affordable units would be reduced by 25 percent. The Reduced Density Alternative would also be less consistent with the intent of SCAG's Regional Comprehensive Plan and Guide to increase residential densities in jobs-rich areas and transportation hubs.

The Reduced Density Alternative would be consistent with the intent of the existing Bunker Hill Design for Development to redevelop under-utilized sites and to provide high quality high-rise buildings at the crest of Grand Avenue in the Bunker Hill Redevelopment

Project area, although to a lesser degree than the Project. The Reduced Density Alternative would also be consistent with the policies of the Downtown Strategic Plan to foster public/private partnerships to bring activity generators, such as retail, entertainment, housing and support systems to downtown Los Angeles; however, also to a lesser degree than the Project with County Office Building Option. The Reduced Density Alternative would introduce full-time residents and would foster pedestrian activity during the evenings and weekends, although to a lesser degree than the Project. Also, since the Reduced Density Alternative would have less retail floor area, it would be less supportive of surrounding residential uses and downtown visitors. Due to the reduction in retail floor area, the Reduced Density Alternative would also contribute incrementally less than the Project to the vibrancy of the streetscape environment. The Reduced Density Option would have the same mix of land uses as the Project with County Office Building Option and would generate a potentially significant impact relative to zoning compliance. As with the Project with County Office Building Option, zone changes and zoning variances would be required. With the granting of such zone changes and variances there would be no significant zoning impact. However, the Reduced Density Alternative would be less environmentally advantageous in meeting the objectives of existing land use plans and policies than the Project with County Office Building Option.

(2) Transportation, Circulation, and Parking

(a) Construction

Under the Reduced Density Alternative, construction activities associated with development would be reduced in scale compared to the Project with County Office Building Option. Construction activities associated with the Civic Park and the Grand Avenue streetscape program would be incrementally less than under the Project with County Office Building Option, due to the reduction in square footage developed under this Alternative. The construction of the Reduced Density Alternative, as with the Project with County Office Building Option, would generate worker traffic, haul trucks, movement of equipment, staging of haul trucks, and, before mitigation, possible impacts associated with emergency access due to street disruption, including the tunneling of Second Street and the installation of utility connections. This Alternative would also generate potentially significant short-term traffic impacts associated with the periodic closures of the existing Civic Center Mall parking structure ramps on Grand Avenue and Hill Street during their reconstruction. The highest periods of truck activity would in the initial months of construction for each block, would be similar to the Project with County Office Building Option and, as such, would generate approximately 130 trucks a day on average increasing to a peak of 300 trucks a day. Although activity would be of shorter duration than the Project with County Office Building Option, short-term significant traffic impacts during the A.M. peak hour would be expected, as under the Project with County Office Building Option. Both the Project with County Office Building Option and this Alternative would be required to

implement a Construction Traffic Control/Management Plan, which would reduce but not eliminate potentially significant short-term construction traffic impacts. However, since buildings would be smaller under this Alternative, less time would be required for the construction of exterior walls, sheathing, and completion of interiors. As such, it is expected that the overlapping of construction activities would be less. As with the Project with County Office Building Option, the Reduced Density Alternative would generate short-term, potentially significant traffic impacts associated with hauling in the A.M. peak hours during the initial phases of development. However, since the phases of construction could be completed in less time, the Reduced Density Alternative would incrementally decrease construction activities and associated construction traffic impacts.

(b) Traffic and Circulation

All trip totals would be reduced proportionally under the Reduced Density Alternative. As shown in Table 104 on page 795, this Alternative would generate approximately 24 percent fewer trips in the A.M. peak hour compared to the Project with County Office Building Option. The Reduced Density Alternative would generate approximately 22 percent fewer trips in the P.M. peak hour compared to the Project with County Office Building Option. This Alternative would generate fewer significant traffic impacts than the Project. Table 11-7 in the Mobility Group and FPL & Associates Traffic Study shows trip generation by parcel and by land uses, with detailed trip generation calculations shown in the Mobility Group and FPL & Associates Traffic Study Appendix C, contained in Appendix B of this Draft EIR.

It is likely that this Alternative would not create CMP and freeway impacts, since the number of P.M. peak hour trips would be less than under the Project with County Office Building Option, and the Project with County Office Building Option's CMP/freeway impacts of the Project with County Office Building Option would be only marginally above the threshold of significance. The Reduced Density Alternative would avoid the Project with County Office Building Option's potentially significant short-term traffic congestion associated with large festivals and other special events occurring in the Civic Park.

(c) Transit

Estimated transit ridership is based on a percentage of projected vehicle trips. As such, the Reduced Density Alternative would generate fewer A.M. and P.M. peak hour transit riders than the Project with the County Office Building Option, since fewer overall trips are generated by this Alternative. Thus, this Alternative would have an incrementally less impact than the Project's less than significant impact on transit capacity,.

Table 104

Comparison of Peak Hour Trips - Reduced Density Alternative

A.M. Peak Hour Trips					
Project with County Office Building Option			Reduced Density Alternative		
In	Out	Total	In	Out	Total
919	632	1,551	694	487	1,181

P.M. Peak Hour Trips					
Project with County Office Building Option			Reduced Density Alternative		
In	Out	Total	In	Out	Total
1,120	1,344	2,464	875	1,049	1,924

Source: The Mobility Group and FPL & Associates, 2006

(d) Parking

The Reduced Density Alternative would provide code-required parking, as would the Project with County Office Building Option. As with the Project with County Office Building Option, the Reduced Density Alternative would require the removal of 1,567 existing parking spaces located on Parcels Q, W-1, L, and M-2, 145 spaces in Parcel W-1, and 385 existing parking spaces located in the Civic Center Mall surface parking lot. In addition, 33 on-street parking spaces would be removed, as under the Project. Compared to the Project with County Office Building Option, under which the combined LAMC and the DAARP residential and commercial parking requirements would be 5,413 spaces, the combined LAMC and DAARP would require 4,076 spaces under the Reduced Density Alternative. Under the LAMC, alone, parking requirements for residential and commercial uses, the County Office Building Option would be 3,377 spaces. Under the LAMC, alone, required parking for the Reduced Density Alternative would be 2,539 spaces. The combined LAMC and DAARP parking requirements are higher than the LAMC requirements, since the DAARP-required parking is higher per dwelling unit than under the LAMC, alone. A summary of LAMC- and DAARP-required parking is presented in Table 11-8 in the Mobility Group and FPL & Associates Traffic Study in Appendix B of this Draft EIR. As with the Project with County Office Building Option, the Reduced Density Alternative would not be consistent with the DAARP requirement of 2.5 spaces per dwelling unit and, as such, would be potentially significant in terms of this policy. Since the Reduced Density Alternative would not provide 2.5 spaces per dwelling unit, parking impacts would be similar to the Project, since this Alternative would not avoid the Project's potentially significant impact associated with the DAARP. This Alternative would also seek a variance/deviation from the DAARP for condominium parking supply, as described for the Project in Section IV.B of this Draft EIR.

As with the Project with County Office Building Option, the Reduced Density Alternative would provide parking in excess of LAMC requirements, based on peak parking demand. Peak commercial parking demand for the Reduced Density Alternative, as shown in Table 105 on page 797, would be approximately 25 percent less than under the Project with County Office Building Option during all time periods.

(3) Aesthetics/Visual Resources

(a) Visual Quality

Construction activities associated with the Reduced Density Alternative would result in the same visual contrast and general disruption in the aesthetic character of the area as what would occur under the Project with County Office Building Option. The construction disruptions along Grand Avenue and within the Civic Center Mall, however, have the potential to be incrementally less than under the Project, since the anticipated improvements for these two components, development of the Conceptual Plans are reduced in scale under this Alternative. Although construction activities would reduce the existing visual attributes of the parcels during the construction phases, these parcels do not currently contain any aesthetic features that contribute to the existing visual character of the area. With mitigation, construction activities associated with the Reduced Density Alternative, as with the Project, would not substantially alter, degrade, or eliminate the existing visual character of the area. Visual quality impacts associated with construction would be similar and less than significant under both the Project with County Office Building Option and the Reduced Density Alternative.

Under the Reduced Density Alternative, the visual amenities associated with the height of buildings under the Project with County Office Building Option would occur, albeit to a lesser degree that would occur under the Project with County Office Building Option. This height reduction would reduce the landmark quality of the hotel and the added variety and interest to the downtown skyline that the Project with County Office Building Option's hotel would achieve. In addition, the Project's design features, which aid to further integrate the design features set forth in the CRA/LA's urban design policies, including the location of Bunker Hill's tallest buildings at the crest of the hill (Grand Avenue) would not be achieved since, in addition to the reduced hotel height, the proposed residential uses along Grand Avenue on Parcels L and M-2 would also be reduced in height. Although both the Reduced Density Alternative and the Project would have less than significant visual quality impacts, the Reduced Density Alternative would be less environmentally beneficial in relation to the visual quality of the Project site and the downtown area.

Table 105

Peak Commercial Parking Demands Comparison – Reduced Density Alternative

Period	Parcel Q		Parcel W-1/W-2		Parcels L and M-2		Total	
	Project with County Office Building Option	Reduced Density Alternative	Project with County Office Building Option	Reduced Density Alternative	Project with County Office Building Option	Reduced Density Alternative	Project with County Office Building Option	Reduced Density Alternative
Weekday								
Day	753	565	1,835	1,376	238	179	2,826	2,120
Eve	982	735	1,845	1,363	254	191	3,081	2,310
Weekend								
Day	900	675	1,866	1,400	279	209	3,045	2,284
Eve	1,013	760	1,855	1,391	270	202	3,136	2,353

Source: *The Mobility Group and FPL & Associates, 2006*

(b) Views

The Reduced Density Alternative would result in the construction of residential and hotel buildings that are 25 percent shorter than those under the Project with County Office Building Option. As with the Project, these buildings would block views of City Hall and the Disney Concert Hall from the Grand Promenade Tower, a 28-story residential high-rise located just south of Parcel M-2. The Reduced Density Alternative would also block notable views of City Hall from the Olive Street sidewalk. Although the Reduced Density Alternative would not be as high as the 28-story Grand Promenade Tower, due to the proximity of development, the Reduced Density Alternative's development on Parcel M-2 would effectively block views of the nearby Walt Disney Concert Hall and distant horizons and/or mountains from a large proportion of the units located in this off-site building. In addition, under the Reduced Density Alternative, the hotel and residential high-rises on Parcel Q would effectively block views of the mountains from the upper floors of the Museum Tower residential high-rise. Under the Reduced Density Alternative, buildings on Parcels W-1/W-2 would include low-rise retail uses, a high-rise residential tower, and a mid-rise office building. Any development on Parcels W-1/W-2 would block views of City Hall from the Olive Street sidewalk, due to the proximity of the development to this viewing location. As such, the Reduced Density Alternative would have similar view impacts to the Project with County Office Building Option and would not avoid the Project's potentially significant view obstruction impacts.

(c) Light and Glare

The Reduced Density Alternative would have similar light and glare impacts to the Project with County Office Building Option, although ambient light associated with spillage from windows of high-rise towers would be incrementally less since the high-rise buildings under the Reduced Density Alternative would have less surface area and fewer windows. Illuminated signage associated with retail uses along the street fronts would be incrementally reduced and any illuminated signage associated with the hotel would be the same. As with the Project with County Office Building Option, the Reduced Density Alternative would result in potential glare impacts from reflected sunlight, as experienced by motorists on adjacent streets. Since exterior light and glare impacts occur primarily at the street level, the light and glare effects of the Reduced Density Alternative and the Project would be similar. As with the Project with County Office Building Option, mitigation in the form of site-plan review, careful use of non-reflective surface materials, and a glare analysis prior to construction would reduce potential glare impacts to a less than significant level. Since an incremental reduction in ambient light and illuminated signage would occur as a result of the Reduced Density Alternative, this Alternative would be environmentally advantageous in relation to light impacts.

(d) Shade/Shadow

The Reduced Density Alternative would incrementally reduce the heights of the Project with County Office Building Option's towers. Although the Project with County Office Building Option would not result in a significant shade/shadow impact, shading would be incrementally less on sensitive uses, when compared to the Project. Notwithstanding, shade/shadow impacts would be less than significant under both the Project with County Office Building Option and the Reduced Density Alternative; however, because the Reduced Density Alternative would result in shorter shadows, the Project's less than significant shadow/shadow impacts would be reduced under the Reduced Density Alternative.

(4) Historical Resources

The reduction in development on Parcels Q, W-1/W-2, L, and M-2 under the Reduced Density Alternative would have no effect on the Project's potential historic impacts as Project development on these parcels has no effect on historic resources.

The Project's proposed streetscape and Civic Park improvements would be reduced, and may even be eliminated, under the Reduced Density Alternative due to lower funding levels, as funding for these improvements is related to the amount of funding available for the park in Phase 1. While reduced funding levels would occur under this Alternative, the potential exists that the Project's impacts on the identified historic resources would be substantially the same under this Alternative as those identified for the Project. However, the possibility exists that this Alternative would have less potential effects on those attributes that give the adjacent buildings and resources their historical significance as lower funding levels could translate to designs that are less intrusive upon the identified historic resources, or no park improvements at all. Regardless, the impacts of the streetscape improvements under the Reduced Density Alternative, as is the case with the Project, would be reduced to less than significant levels through the application of the identified mitigation measures.

Due to the reduced funding levels available under the Reduced Density Alternative, the level of improvements occurring within the Civic Park would be less extensive than under the proposed Project. This change may result in reduced impacts, but not necessarily, as the character-defining features of the existing Civic Center Mall may be modified in a similar fashion as the Project, with the difference under this Alternative being a lower level of improvements once the character-defining features are modified. As such, impacts under the Reduced Density Alternative are concluded to be similar to those of the Project. As is the case with the Project, if the character-defining features within the existing Civic Center Mall are retained and reused in a manner consistent with the Standards and as stipulated in the Draft EIR, then potential impacts to this resource would not occur and mitigation measures would not be

required. In the event that impacts are not fully mitigated, the Reduced Density Alternative, as is the case with the Project, would result in impacts that are significant.

(5) Population, Housing and Employment

Under the Reduced Density Alternative, there would still be increases in the amount of housing and population in the Project area, as well as increases in employment opportunities. However, these increases would be reduced from those of the Project with County Office Building Option by 25 percent. As shown in Table 106 on page 801, there would be 1,545 housing units, with a population of 2,194. The number of affordable units would be reduced from 412 units to 309 units. There would be 2,932 employees. The increases in population, housing and employment would represent lesser amounts of the expected growth in the City of Los Angeles Subregion than would the Project. The population would be 1.1 percent of the growth (in contrast to the Project with County Office Building Option's 1.4 percent), the number of households would be 1.2 percent (in contrast to the Project with County Office Building Option's 1.8 percent) and the number of employees would be 1.1 percent (in contrast to the Project with County Office Building Option's 1.8 percent). As is the case with the Project this would be substantially less than the projected growth for the City of Los Angeles Subregion. As is the case with the Project, population, housing and employment growth projections would not be exceeded; and impacts regarding growth would be less than significant. At the subregional level, impacts of the Reduced Density Alternative and the Project would be similar.

The Reduced Density Alternative would be less advantageous than the Project with County Office Building Option with regard to plan consistency. Numerous policies would be supported to a lesser degree by the Reduced Density Alternative. These include policies that encourage (1) increases in the housing stock and the availability of affordable units, (2) placement of housing in the jobs-rich downtown area, (3) placement of housing at the hub of transportation, public transportation and pedestrian route opportunities, and (4) the creation of employment opportunities, with increased vibrancy in the downtown area. However, the Reduced Density Alternative would somewhat support these growth plans and policies. Therefore, the impacts of the Reduced Density Alternative on plan consistency, as is the case with the Project, would be less than significant. While not significant, impacts of the Reduced Density Alternative on population, housing, and employment would be greater (i.e., less advantageous) than those of the Project.

(6) Air Quality

Under the Reduced Density Alternative, construction activities associated with development would be reduced in scale compared to the Project. Construction activities associated with the Civic Park and the Grand Avenue streetscape program would be

Table 106

Alternative 3 - Population and Employment

Population

Total Housing Units	1,545
Average Household Size	1.42 ^a
Total Population ^b	2,194

	<u>Proposed</u>	<u>Factor ^c</u>	<u>Total Employment</u>
Employment			
Retail	336,750 sq.ft.	500 sq.ft./employee	674
Office	510,750 sq.ft.	250 sq.ft./employee	2,043
Hotel	206 rooms	0.9 employees/acre	185
Park	16 acres	0.65 employees/acre	10
Park Restaurant	<u>10,000 sq.ft.</u>	500 sq.ft./employee	<u>20</u>
Total			2,932

^a Household size is based on the 2004 household size for the Project's Census Tract.

^b Assumes 100 percent occupancy.

^c Based on data provided in the Institute of Transportation Engineers, Sixth Edition, 1997.

Source: PCR Services Corporation, July 2003.

incrementally less than under the Project due to the reduction in square footage developed under this Alternative. As with the Project with County Office Building Option, construction of this Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be less under the Reduced Density Alternative compared to the proposed Project with County Office Building Option. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could decrease compared to the proposed Project with County Office Building Option. The construction emissions generated by the Reduced Density Alternative would be less than those of the proposed Project with County Office Building Option over the construction period. However, impacts during maximum conditions, those used for measuring significance, would be similar to those of the proposed Project with County Office Building Option and would be significant under the Reduced Density Alternative for regional construction emissions. Localized pollutant construction impacts would also be similar to the proposed Project with County Office Building Option as both the intensity and duration of excavation and grading would be similar, and would also be significant.

The number of daily trips generated by this Alternative (22,601 ADT) would be 21 percent less than the proposed Project with County Office Building Option (17,917 ADT),

resulting in proportionate decreases in mobile air quality emissions. The total contributions to regional emissions under this Alternative would remain significant, as is the case with the proposed Project with County Office Building Option. Although this Alternative would result in significant regional air quality impacts, the magnitude of the impacts would be less than the proposed Project's impact.

Localized impacts are determined mainly by the peak hour intersection traffic volumes. Compared to the proposed Project, this Alternative is forecasted to generate approximately 24 percent fewer trips during the A.M. peak hour compared and 22 percent fewer trips during the P.M. peak hour. Since the localized CO hotspot analysis for the proposed Project did not result in any significant impacts, this Alternative would likewise not have any localized impacts due to fewer trips generated.

With respect to potential air toxic impacts, this Alternative would avoid locating sensitive receptors within siting distances identified by SCAQMD and ARB guidelines. Thus, similar to the proposed Project with County Office Building Option, this Alternative would result in a less than significant air quality impact related to air toxics. In summary, impacts under this Alternative would be less than with the Project, but as with the Project would be significant for both construction and operations air quality impacts.

(7) Noise

Under the Reduced Density Alternative, construction activities associated with development would be reduced in scale compared to the Project. Construction activities associated with the Civic Park and the Grand Avenue streetscape program would be incrementally less than under the Project due to the reduction in square footage developed under this Alternative. Because the type of construction associated with this Alternative would be similar to the proposed Project, daily construction-related noise levels experienced both within the Project site and the immediate vicinity would be similar to the proposed Project and are considered significant. However, there would be fewer days of construction activity associated with this Alternative since it reduces the amount of developed uses by 25 percent.

A reduction in land use intensity would also result in a slight reduction in noise levels associated with operational on-site equipment and activity. The on-site equipment and activity noise levels associated with the Project with County Office Building Option are not considered significant and would be less so with this Alternative. An expected reduction of 21 percent in daily traffic volumes associated with this Alternative would yield a slight reduction in comparison to Project with County Office Building Option traffic noise. As with the proposed Project with County Office Building Option this Alternative would result in a less than significant roadway noise impact.

(8) Hazardous Materials

The Reduced Density Alternative would require a similar amount of site preparation to the proposed Project with County Office Building Option since the Civic Park and Grand Avenue streetscape improvements would be implemented and excavation and grading activities in the five development parcels would be similar. It is assumed for this analysis that the reduced funding level for the Civic Park and the streetscape program would not alter the amount of excavation needed to implement these aspects of this Alternative. Demolition and excavation activities in the five development parcels would also be similar. Potential exposure to previously unrecorded hazardous materials would be the same under both the Project with County Office Building Option and the Reduced Density Alternative. As with the Project, compliance with regulatory measures would reduce potentially significant impacts to less than significant levels and would result in the remediation of any currently unknown hazardous conditions. Impacts associated with hazardous materials would be similar and less than significant under both the Project with County Office Building Option and the Reduced Density Alternative.

(9) Public Services

(a) Fire Services

Implementation of the Reduced Density Alternative would reduce the impacts on the level of fire services required at the Project site due to the reduced amount of building area, and reduced site populations. Reduced construction activity would marginally reduce the chance of construction related incidents requiring emergency response as well as also reduce potential short-term impacts on emergency access due to lane closures for construction. However, activities requiring lane closures have more to do with utility tie-ins, etc. rather than building volumes, and reductions on lane closures may not be notably different from that which would occur under the Project.

The reduction in the amount of site activity during on-going operations would also reduce the number of potential incidents at the Project site, and reduce the potential for impacts on emergency access. As is the case with the Project, sufficient fire facilities are located within the specified regulatory distances, and the development would be required to provide fire flows, and site/building design to meet standards for fire protection, thus avoiding significant impacts. Impacts of the Reduced Density Alternative would be less than those of the Project, but also less than significant.

(b) Police

Implementation of the Reduced Density Alternative would reduce impacts on the level of police services required at the Project site due to the reductions in the amount of site population and amount of site activity. Reduced construction activity would also lessen the impacts on emergency access. However, activities requiring lane closures have more to do with utility tie-ins, etc. rather than building volumes, and reductions on lane closures may not be notably different from that which would occur under the Project. Marginal reductions in construction workers during off-peak hours would also not have a notably different affect on emergency access.

The Reduced Density Alternative would introduce new populations to the Project site with 2,194 new residents and 3,362 commercially related population, for a total of 5,556 persons. This would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 146 residents. There would also be an estimated increase in crimes of 856 cases per year, or 2.54 additional crimes that would be handled per year for each officer.

Operations under the Project with County Office Building Option would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 152 persons as well as an estimated increase in crimes of 1,153 cases, or 3.4 crimes more per year for each officer. With private security, especially for park activities, and mitigation measures for site safety and protection, Project impacts would be less than significant. Therefore, impacts of Reduced Density Alternative would be less than those of the Project, and would also be less than significant. Therefore, the Project's less than significant demand on police services would be less under the Reduced Density Alternative.

(c) Schools

The Reduced Density Alternative would generate fewer students than the Project with Additional Residential Development Option. As indicated in Table 107 on page 805, the Reduced Density Alternative would generate a total of 420 students, with 187 elementary school students, 106 middle school students and 127 high school students. In contrast, the Project with Additional Residential Development Option would generate 632 local LAUSD students, consisting of 314 elementary school students, 157 middle school students, and 161 high school students. The Reduced Density Alternative represents a reduction of 212 students, or approximately 33.5 percent less than the 632 students under the Project with Additional Residential Development Option.

Table 107

Alternative 3 - Estimated Student Generation

A. Residential Component*Condominium Units*

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.0867	1,236	107
Middle	0.0434	1,236	54
High	0.0438	1,236	<u>54</u>
Total Students (Single-Family Attached)			215

Multi-Family Units

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.2396	309	74
Middle	0.107	309	33
High	0.0933	309	<u>29</u>
Total Students (Multi-Family)			136

B. Commercial Component

School Level	Student Generation Rates ^c	Total Number of Employees	percent of Employees within Boundaries	Forecasted Student Generation ^b
Elementary	0.106	2,932	.02	6
Middle	0.049	2,932	.13	19
High	0.060	2,932	.25	<u>44</u>
Total Students (Commercial Component)				69

C. Combined Total from Residential and Commercial

	Elementary	Middle	High	Total
Total Students Generated (Residential and Commercial: Within Attendance Boundaries)	187	106	127	420

^a LAUSD Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004^b Number of Students rounded to the nearest whole number.^c Based on rates generated by LAUSD.

Source: PCR Services Corporation.

The students generated under the Project with Additional Residential Development Option would exceed the anticipated seating capacity at Castelar and Gatts Elementary Schools, even after the development of new schools in the area. Project impacts would be mitigated through the payment of fees for new schools per California Government Code Section 65995.

Thus, impacts of the proposed Project with Additional Residential Development Option would be less than significant.

Impacts of the Reduced Density Alternative would be less than those of the Project with Additional Residential Development Option. However, the decrease in the number of students would not be sufficient to avoid the potentially significant impact at Castelar and Gatts Elementary Schools. As is the case with the Project, impacts would be mitigated through the payment of developer fees. With the payment of these fees, impacts of the Reduced Density Alternative, as is the case with the Project, would be less than significant.

(d) Parks and Recreation

The Reduced Density Alternative would require construction within the existing Civic Center Mall and, as such, would result in the same potentially significant, short-term impact on park and recreation services as the Project.

The Reduced Density Alternative includes 1,545 new housing units, with an additional population of 2,193 residents. The new population would seek out recreational opportunities and in so doing increase the demand for park and recreational services in the Project area. The Reduced Density Alternative would also include the 16-acre civic park, with amenities that are reduced to those of the proposed Project.

In contrast, the Project with Additional Residential Development Option would generate 3,777 residents. The analysis of the Project's impacts on park space addresses the additional demand on park space that would be generated by Project's added population, pursuant to the City methods for analyzing and providing new park space for City residents. The analysis recognizes that the Project would be required to meet the City's Quimby requirements through the provision of dedicated park space at a rate of 3 acres per 1,000 population, payment of in-lieu fees, or a combination of the two. As the implementation of this requirement is based on the number of residents within a project, the parks contribution for the Project with Additional Residential Development Option would be greater than what would occur under this Alternative. Likewise, the Reduced Density Alternative would provide proportionately less contribution to park facilities. Regardless, the contributions to the City's park facilities are provided on a per capita base and are therefore equivalent in regard to their respective populations. As such, both the Project and the Reduced Density Alternative would accommodate their respective additional park demands, and avoid a significant impact on parks and recreation services.

The Reduced Density Alternative, however, has the potential to provide fewer streetscape improvements and less expansion or renovation of Civic Center Mall, since improvements would be commensurate with available funding available in Phase 1 of the Project from lease revenues.

As such, it is considered to be less advantageous in relation to quality of experience associated with open space amenities and recreation than the Project with County Office Building Option and the Project with Additional Residential Development.

(e) Libraries

The Reduced Density Alternative includes 1,545 new housing units, with an additional population of 2,193 residents at the Project site. The added population would make use of nearby libraries, and increase the demand for library services. In addition, its employees, hotel patrons, visitors and tourists might also use the downtown Central Library, a regional facility, and/or other nearby libraries.

In contrast, the Project with Additional Residential Development Option would generate 3,777 residents as well as employees, hotel patrons, visitors and tourists who might use the library facilities. The Project's additional population is not expected to exceed the libraries' defined target service population, nor require library expansion. Therefore, Project impacts are less than significant. The No Reduced Density Alternative would incrementally reduce demand for library services compared to the Project's less than significant demand on library services. Therefore, under the Reduced Density Alternative, demand for library services would be less than significant and less than under the Project.

(10) Utilities

(a) Water Supply

Impacts of the Reduced Density Alternative would require hook-ups to the existing water main lines that are similar to those of the Project with Additional Residential Development Option. The installation of these hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. Water would be used during construction for dust suppression and other construction-related activities. Such water usage would be intermittent, temporary, and less than that of the completed development. Impacts on water supply during construction would be somewhat similar and less than significant under the Project as well as the Reduced Density Alternative.

The Reduced Density Alternative would have 25 percent less development than the proposed Project, with 1,545 units, 206 hotel rooms, 510,750 sq. ft. of office space, and 336,750 sq. ft. of retail space. Therefore, the water consumption from these uses would be 75 percent of that calculated for the Project with County Office Building Option. As shown in Table 108 on page 808, the commercial uses would consume 186,438 gallons per day on average and 316,945 gallons on a peak day. The residential component would consume 273,652 gallons on an

Table 108

Alternative 3 - Anticipated Water Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
Commercial						
Hotel	206	rooms	130	26,780	221	45,526
Retail	336,750	square feet	80	26,940	136	45,798
Office	510,750	square feet	180	91,935	306	156,290
<i>Subtotal</i>				<i>145,655</i>		<i>247,614</i>
Outdoor Water Use (28% of Consumption)				<u>40,783</u>		<u>69,332</u>
Total Commercial				186,438		316,945
Residential						
1 bedroom	912	dwelling unit	120	109,440	204	186,048
2 bedroom	541	dwelling unit	160	86,560	272	147,152
3 bedroom	92	dwelling unit	200	18,400	340	31,280
<i>Subtotal</i>				<i>214,400</i>		<i>364,480</i>
Outdoor Water Use (18% of Consumption)				<u>38,592</u>		<u>65,606</u>
Parking^c	1,033	ksf	20	<u>20,660</u>	34	<u>35,122</u>
Total Residential				273,652		465,208
Streetscape	0.75	acres	3,650	2,738	6,205	4,655
Park						
Landscape Acreage ^d	10.5	acres	3,650	21,910	6,205	37,247
Restaurant	7,500	square feet	900	6,750	1530	11,475
Restrooms	149	fixtures	100	14,900	170	25,330
Total Park				59,975		101,958
Total –				522,803		888,766

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses are expressed in terms of gpd per 1,000 square feet of floor area.

^b Water consumption factors multiplied by a maximum daily peaking factor of 1.7.

^c Total parking floor area based on the percentage reduction of code required parking under this Alternative and 325 square feet per parking space.

^d Water demand levels are net of existing water demand for the park.

Source: PCR Services Corporation, 2006.

average day and 465,208 gallons on a peak day. As indicated, water consumption for the streetscape has the potential to be less than the Project with County Office Building Option and the Project with Alternative Residential Development Option, since Grand Avenue streetscape and Civic Park improvements have the potential to be less, since they would be commensurate with funding from the development of the five parcels.

The total water consumption for the Reduced Density Alternative would be 522,803 gallons on an average day and 888,766 gallons on a peak day. The estimated net water

demand for the Project with County Office Building Option is 844,403 gallons on an average day, and 1,435,484 gallons on a peak day. Water infrastructure and requirements for fire flow are sufficient to meet these demands. Therefore, impacts under the Project and this Alternative would be less than significant.

Impacts of the Reduced Density Alternative, based on water demand, would be incrementally reduced by approximately 38 percent from those of the proposed Project, and would, like those impacts, be less than significant.

(b) Wastewater

Impacts of the Reduced Density Alternative would require hook-ups to the sewer lines that are similar to those of the Project. These hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. It is anticipated that portable toilets would be provided and maintained by a private, contracted vendor during the construction phase of the Project, and that the vendor would dispose of waste off-site. Therefore, wastewater generation during construction would be negligible. Impacts of the Reduced Density Alternative on wastewater generation during construction would be somewhat similar to those of the Project and, thus, less than significant.

The Reduced Density Alternative would have 25 percent less development than the proposed Project, with 1,545 units, 206 hotel rooms, 510,750 sq. ft. of office space, and 336,750 sq. ft. of retail space. Therefore, wastewater generation from these uses would be 75 percent of that calculated for the proposed Project with County Office Building Option. As shown in Table 109 on page 810, the commercial uses would generate 145,655 gallons on an average day and 247,614 gallons on a peak day. The residential component would generate 214,400 gallons on an average day and 364,480 gallons on a peak day. The wastewater produced from uses in the park would be 25 percent less than that of the Project, generating 21,650 gallons on an average day and 36,805 gallons on a peak day. Therefore, the total wastewater generation from the residential, commercial and park components would be 380,505 gallons on an average day and 646,859 gallons on a peak day.

The estimated net wastewater generation for the Project with County Office Building Option is 631,650 gallons per day on average and 1,073,805 gallons on a peak day. Wastewater infrastructure and capacity is sufficient to meet these demands. Therefore, these impacts would be less than significant.

Impacts of the Reduced Density Alternative would be 40 percent less than those of the proposed Project with County Office Building Option and would, like those impacts, be less than significant.

Table 109

Alternative 3 - Anticipated Wastewater Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
Commercial						
Hotel	206	rooms	130	26,780	221	45,526
Retail	336,750	square feet	80	26,940	136	45,798
Office	510,750	square feet	180	<u>91,935</u>	306	<u>156,290</u>
Total Commercial				145,655		247,614
Residential						
1 bedroom	912	dwelling unit	120	109,440	204	186,048
2 bedroom	541	dwelling unit	160	86,560	272	147,152
3 bedroom	92	dwelling unit	200	<u>18,400</u>	340	<u>31,280</u>
Total Residential				214,400		364,480
Park						
Restaurant ^c	7,500	square feet	900	5,550	1530	9,435
Restrooms	149	fixtures	100	14,900	170	25,330
Total Park				20,450		36,805
Total				380,505		646,859

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses are expressed in terms of gpd per 1,000 square feet of floor area.

^b Water consumption factors multiplied by a maximum daily peaking factor of 1.7.

^c Net of existing sewage demand within the park.

Source: PCR Services Corporation, 2006.

(c) Solid Waste

The Reduced Density Alternative would generate waste debris from construction activities. The debris from residential construction (4.38 lbs per sq.ft. and 1,616,250 square feet of construction) and commercial development (4.2 lbs per square foot and 1,083,750 square feet) would be 5,816 tons per year. This is less than the 7,800 tons that would be generated by the Project. The amount of construction debris associated with street and park improvements, 23,232 tons per year, would be similar to the Project's. The total amount of construction waste with this Alternative, 29,048 tons per year would be less than the Project's 31,120 tons per year, by 7 percent.

The amount of solid waste generated during operations of the Reduced Density Alternative is shown in Table 110 on page 811. As indicated, this Alternative would generate approximately 5,278 tons of solid waste per year, approximately 25 percent less than the Project with County Office Building Option's 7,072 tons per year. The analysis of the Project's solid

Table 110

Alternative 3 - Anticipated Solid Waste

Use Type	Amount of Development	Units	Employees ^b	Disposal Rate (tons/employee/year) ^a	Total (tons/year)
Commercial					
Hotel	206	rooms	185	2.10	389
Retail	230,250	square feet	461	0.30	138
Restaurant	69,000	square feet	138	3.10	428
Health Club	37,500	square feet	75	0.90	68
Office	510,750	square feet	2,043	1.70	<u>3,473</u>
Total Commercial					4,496
Residential		1,545 dwelling units		0.46	711
Total Residential					9,703
Park	16	acres	10	0.90	9
Park Restaurant	10,000	square feet	20	3.10	62
Total					5,278

^a Disposal Waste rate calculations are based on CIWMB published units.

^b Derived from factors generated by PCR Services Corporation based on data presented in the Institute of Transportation Engineers, Trip Generation Manual.

Source: PCR Services Corporation

waste impacts indicates that the inert land-fills that would accept the construction debris have an estimated 60 year capacity. Further, the Project's solid waste due to operations would comprise less than 0.001 percent of the 9.11 million tons of total waste generated within the City of Los Angeles and disposed of daily at major landfills in the region, and planning for future needs is being based on a 15 year projected needs bases. Therefore, impacts of the Reduced Density Alternative, as is the case with the Project, would be less than significant.

c. Relationship of Reduced Density Alternative to the Project Objectives

The Reduced Density Alternative may not meet the ultimate goal of the Project to provide an economically viable development, since, with the reduction in scale, the Reduced Density Alternative would not be as economically viable as the Project. In addition, the Reduced Density Alternative would not meet the majority of the Project's priority objectives to create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, to the same extent as the Project. Furthermore, since the Alternative has less development than the Project, it would not meet the priority objective to implement redevelopment plan objectives to permit a maximum density of development. The Reduced Density Alternative also would not implement the Project's priority objective to generate at least \$50 million in funds from the Project itself, and at least \$45 million from Phase

1, by the lease of public land, and then to use these funds to improve and extend the existing Los Angeles County Mall into the proposed Civic Park. In addition, this Alternative would not implement the Grand Avenue Streetscape Program (except, adjacent to Parcel Q), further reducing the ability of this Alternative to meet the objectives of the Project to create a civic gathering place and to enhance pedestrian connections.

The Reduced Density Alternative would meet the priority objectives to ensure that 20 percent of all residential units in the Project are affordable units; however, due to the reduction in residential units, this would provide 25 percent fewer affordable units than by the Project. This Alternative would also meet the priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County. However, since it would represent a reduction in scale, the stream of additional tax revenues would be incrementally less than under the Project.

The Reduced Density Alternative would meet the Project's objective to encourage public transit opportunities through the development of high-density residences in close proximity to exiting transit systems. The Reduced Density Alternative would also meet the Project objective to provide residential densities in the Bunker Hill Redevelopment Project area as well as improve the jobs/housing balance downtown and establish a variety of housing types, although it would not maximize residential densities, as would the Project. The Reduced Density Alternative would also implement the redevelopment plan objectives to provide housing for workers who seek housing near their employment, but to a lesser degree than what would likely occur under the Project.

The Reduced Density Alternative would reduce, but not avoid, the Project's significant and unavoidable impacts associated with zoning compliance construction hauling, lane closures, periodic closures of the Grand Avenue and Hill Street ramps to the garage beneath the Civic Center Mall during their reconstruction, operation traffic, occasional traffic congestion during evening and large-scale events in the Civic Park, DAARP residential parking requirements, view obstruction, air quality (construction and operation), and noise (construction). Additionally, this Alternative may possibly reduce impacts associated with the possible removal of the historically significant character-defining features in the Civic Center Mall, and short-term recreational impacts associated with the closure of Civic Center Mall during the Civic Park's construction phase, if the scope of the development in the Civic Park were reduced. . The Reduced Density Alternative would also incrementally reduce the Project's less than significant impacts related to shade/shadow, police services, schools, and utilities as well as reduce the Project's less than significant construction visual quality impacts, since construction would be completed within a shorter time frame.

4. Alternative 4: Alternative Design

a. Introduction and Description of the Alternative Design Alternative

The Alternative Design Alternative was developed in response to the potential significant impacts of the Project with regard to the historical resources currently present within the Civic Center Mall and the Project's significant view impacts for locations that are located south of Parcels L and M-2.

The conclusions of the historical analysis (see Section IV.D of the Draft EIR) are that significant impacts would result if any of the four identified character-defining features are either not retained and reused in a manner consistent with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings (Standards); or if the improvements implemented within the Civic Park are not done so in accordance with the Standards. Therefore, for the purposes of analyzing the Alternative Design Alternative, implementation of the Civic Park would only occur in accordance with the Standards. In summary, the four identified character-defining features are as follows: (1) the water feature (both the fountain and pools) no longer serves as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. Additionally, the Standards should be utilized to ensure that rehabilitation work to the park does not impair those qualities and historic characteristics of these four key character-defining features that convey the property's significance and qualify it for California Register listing. If the character-defining features noted above were retained and reused in a manner consistent with the Standards and as stipulated in this analysis, then potential impacts to this resource would not occur and mitigation measures would not be required.

In response to the significant view impacts attributable to the towers proposed for development on Parcels L and M-2, the towers under the Alternative Design Alternative would be reversed, such that the tower proposed for the southeast corner of Parcels L and M-2 would be moved to the southwest corner, and the tower proposed for the northwest corner would be moved to the northeast corner. The reversal of the tower buildings would increase the setback between the highest structures on Parcels L and M-2 and the existing, adjacent Grand Promenade Tower residential building. The intent of the increased setback is to open views from the Grand Promenade Tower building towards the north.

Under the Alternative Design Alternative, the same amount of residential and commercial development as the Project with County Office Building Option (3.6 million square feet) would be developed. The components of the Alternative Design Alternative are compared to the Project, and Alternatives 1 through 3 and 5 in Table 119 on page 848.

b. Analysis of Alternative

(1) Land Use

(a) Civic Park and Grand Avenue Streetscape

The various configurations for the Civic Park that could occur under the Alternative Design Alternative would be consistent with the intent of the Los Angeles Civic Center Shared Facilities and Enhancement Plan to upgrade the existing mall and to utilize the western section of the park as a venue for cultural and entertainment uses. In addition, since the circular driveways to the subterranean parking structure would not be retained, pedestrian and visual access to the Civic Park from Grand Avenue would be enhanced, as under the Project. As such, this Alternative, as is the case with the Project, would be as consistent with the Open Space policies of the General Plan Framework; Government and Public Facilities policies, Civic Open Space policies, and Pedestrian Linkages policies of the Central City Community Plan; Cultural Diversity and Open Space policies of the Downtown Strategic Plan; and Civic Center Mall policies of the Los Angeles Civic Center Shared Facilities and Enhancement Plan. Thus, the impacts of the Alternative Design Alternative in relation to existing land use plans and land use compatibility would be similar to the Project and, thus, less than significant. As no changes to the Grand Avenue streetscape program would occur under this Alternative, impacts would be the same and less than significant. All of the other components of the Project would also be included under this Alternative and, as the Project, these would have a less than significant impact.

(b) Parcels Q, W-1/W-2, L, and M-2

The reversal of the tower buildings on Parcels L and M-2 would increase the setback between the tower structures on Parcels L and M-2 and the existing Grand Promenade Tower residential building, located to the south. As the Project's land uses would be compatible with the existing 28-story Grand Promenade Tower residential land use, the increased setback between the existing and proposed tower structures would further improve land use compatibility. The Alternative Design Alternative would be identical to the Project with County Office Building Option in relation to land use compatibility resulting from residential, retail, and commercial uses and building heights. As with the Project with the County Office Building Option, the development of the five parcels under the Alternative Design Alternative would meet

the objectives of the Downtown Center designation of the General Plan Framework, the Central City Community Plan, the Bunker Hill Redevelopment Plan, the Bunker Hill Urban Renewal Project (1990), the Downtown Strategic Plan, the Bunker Hill Design for Development, and SCAG's Regional Comprehensive Plan and Guide. As with the Project with the County Office Building Option, the Alternative Design Alternative would not generate any significant land use impacts relative to adopted land use plans. The Alternative Design Alternative would have the same mix of land uses as the Project with the County Office Building Option and, as such, would cause a potentially significant impact relative to zoning compliance. As with the Project, the Alternative Design Alternative would require a zone change and zoning variances. However, since this Alternative would increase the setback between the existing Grand Promenade Tower residential building and the proposed towers on Parcels L and M-2, it would be more environmentally advantageous than the Project with County Office Building Option, in relation to land use compatibility. All of the other components of the Project with County Office Building Option would also be included under this Alternative and, with the exception of zoning impacts, these would have a less than significant impact.

(2) Transportation, Circulation, and Parking

(a) Construction

Under the Alternative Design Alternative, construction activities would be similar to the Project Options, since the scope of development regarding the Civic Park, the Grand Avenue streetscape program, and development of the five parcels would be similar. All of the other components of the Project with the County Office Building Option would also be included under this Alternative and, as the Project, this Alternative would generate up to 300 haul trucks a day during peak construction periods. Since many of these trips would occur during the A.M. peak hour, short-term impacts associated with hauling during the A.M. hours during the initial construction phases would be similar to the Project and potentially significant. In addition, as with the Project, this Alternative would generate a potentially significant short-term traffic impact associated with lane closures, and the periodic closures of the Grand Avenue and Hill Street ramps to the Civic Center Mall parking structure during their reconstruction. A Construction Traffic Control/Management Plan, which would reduce, but not eliminate, potentially significant short-term construction traffic impacts, would be implemented under this Alternative, as is the case with the proposed Project.

(b) Traffic and Circulation

The scope of development would be the same as under the Project with County Office Building Option. Traffic and circulation impacts would be identical to that option, as discussed in Section IV.B in this Draft EIR. All of the components of the Project would be included under

this Alternative and, as is the case with the Project with County Office Building Option, would result in significant and unavoidable impacts after mitigation at the locations identified in Section IV.B, above.

(c) Transit

Estimated transit ridership is based on a small percentage of projected vehicle trips. As such, the Alternative Design Alternative would generate the same number of transit riders as the Project with the County Office Building Option, since peak hour trips under the Alternative and the Project with the County Office Building Option would be the same. Since the Project's demand relative to transit capacity would be less than significant, the Alternative Design Alternative would, likewise, have a similar and less than significant impact on transit.

(d) Parking

The Alternative Design Alternative would provide the same number of parking spaces as the Project with County Office Building Option. As with the Project, the Alternative Design Alternative would provide parking in excess of LAMC requirements, based on peak parking demand. Peak parking demand for the Project is described in Section IV.B of this Draft EIR. As with the Project, the Alternative Design Alternative would not be consistent with the Deputy Advisory Agency Residential Policy (DAARP) requirement of 2.5 spaces per dwelling unit and, as such, would be potentially significant in terms of this policy. Since the Alternative Design Alternative would not provide 2.5 spaces per dwelling unit, parking impacts would be similar to the Project, since this Alternative would not avoid the Project's potentially significant impact associated with the DAARP. This Alternative, as is the case with the Project, would require a variance/deviation from the Deputy Advisory Agency Policy for condominium parking supply, as described for the Project with County Office Building Option in Section IV.B of this Draft EIR. All of the other components of this Alternative, including the Civic Park and Grand Avenue Conceptual Plans, would be the same as under the Project with County Office Building Option and, as with the Project with County Office Building Option, would not generate any significant parking impacts relative to off-site parking, existing on-street parking, and parking demand.

(3) Aesthetics/Visual Resources

(a) Construction

(i) Visual Quality

Civic Park and Grand Avenue Conceptual Plans

Under the Alternative Design Alternative, construction activities would be the same as under the Project as it assumed that the proposed changes to the Civic Park under this Alternative would not have a material affect on the extent of construction required to implement the Civic Park. The Grand Avenue Conceptual Plans would be the same as under the Project. As such, construction activities in the renovation and expansion of Civic Park and development of the Grand Avenue Conceptual Plan would be short-term and substantially similar to the Project. As with the Project visual quality impacts associated with construction of this Alternative would be less than significant.

Parcels Q, W-1/W-2, L, and M-2

The scope of development under this Alternative would be the same as under the Project with County Office Building Option. Construction activities associated with the Alternative Design Alternative would be the same as under the Project with County Office Building Option and would result in the same potential visual contrast and general disruption in the aesthetic character of the area. Excavation, grading, and construction of structures would be the same as under the Project with County Office Building Option, as would the duration and phasing of construction. With mitigation, construction activities associated with the Alternative Design Alternative, as with the Project with County Office Building Option, would not substantially alter, degrade, or eliminate the existing visual character of the area. Visual quality impacts associated with construction would be similar and less than significant, as is the case with the Project with County Office Building Option.

(b) Operation

(i) Visual Quality

Civic Park and Grand Avenue Streetscape Conceptual Plans

Under the Alternative Design Alternative, the visual quality of the Civic Park would be enhanced through the preservation of the existing fountain and other character defining features

that would, otherwise, be removed under the Project. As no changes to the Grand Avenue streetscape program would occur under this Alternative, impacts would be the same and less than significant. As it assumed that the proposed changes to the Civic Park under this Alternative would not have a material affect on the extent of construction required to implement the Civic Park. Therefore, the Alternative Design Alternative would be considered more environmentally advantageous than the Project's Civic Park Conceptual Plan in overall visual quality.

Parcels Q, W-1/W-2, L, and M-2

In the reversing the location of the Project with County Office Building Option's towers on Parcels L and M-2, the Alternative Design Alternative would increase the setback between the 28-story Grand Promenade Tower residential high-rise and the proposed towers on Parcels L and M-2. The setbacks would also create greater variation in the skyline due to greater space between tower structures, when viewed together with the Grand Promenade Tower. Although the Project would not create a significant visual quality impact, the Alternative Design Alternative would be more environmentally advantageous in relation to overall visual quality. All of the other development components of this Alternative would be the same as under the Project with County Office Building Option and, as with the Project with County Office Building Option, would not generate any significant visual quality impacts.

(ii) Views

In reversing the tower buildings on Parcels L and M-2, the Alternative Design Alternative would result in a greater setback between the towers on Parcels L and M-2 and the existing, adjacent 28-story Grand Promenade Tower. Due to the resulting setbacks, the potential blockage of views toward the north and northeast of the Walt Disney Concert Hall and the horizon (i.e., mountains) would be less than under the Project. Under the Alternative Design Alternative, the development of Parcels Q and W-1/W-2 would be the same as under the Project with County Office Building Option. The potential blockage of valued views of the horizon and/or mountains from the Museum Tower residential building and the blockage of views of City Hall from Olive Street would be the same as under the Project with County Office Building Option. Although the Alternative Design Alternative would reduce the Project's potentially significant view impact on Grand Promenade Tower, the Alternative Design Alternative would not avoid the Project with County Office Building Option's potentially significant view obstruction impacts of City Hall from Olive Street.

(iii) Light and Glare

The Alternative Design Alternative would generate similar ambient light as the Project with County Office Building Option since ambient light associated with spillage from building

windows would be similar. However, light impacts from Parcel M-2 would be incrementally reduced in relation to the adjacent Grand Promenade Tower residential building, since the Parcel M-2 tower would be located at a greater distance from the Grand Promenade Tower. Illuminated signage associated with retail uses along the street fronts and street and sidewalk lighting would be the same as under the Project with County Office Building Option. As with the Project with County Office Building Option, the Alternative Design Alternative could result in potential glare impacts from reflected sunlight and, as with the Project with County Office Building Option, mitigation in the form of site-plan review, careful use of non-reflective surface materials, and a glare analysis prior to construction would reduce potential glare impacts to a less than significant level. Although the Alternative Design Alternative would have a similar daytime glare impact as the Project with County Office Building Option, it would have less nighttime light impact on the adjacent Grand Promenade Tower. As such, the Alternative Design Alternative would be environmentally advantageous in relation to light impacts.

(iv) Shade/Shadow

Except for the reversal of buildings in Parcels L and M-2, the other development components of the Alternative Design Alternative would be the same as under the Project. The Alternative Design Alternative shade/shadow impacts would be substantially the same as the Project's. However, since the northerly of the Project's two towers on Parcels L and M-2 would be located to the east of its proposed location, shading of the Bunker Hill Tower Apartments west of Hope Street (a sensitive use), would be incrementally reduced. Although both the Project with County Office Building Option and the Alternative Design Alternative would generate less than significant shade/shadow impacts, shading of the Walt Disney Concert Hall would be incrementally less under the Alternative Design Alternative, due to the change in the tower locations on Parcels L and M-2. Therefore, the Alternative Design Alternative would slightly reduce the Project with County Office Building Option's less than significant impact.

(4) Historical Resources

One of the reasons for the inclusion of this Alternative in the analysis is to address the Project's potential impacts on the historic resources present within the existing Civic Center Mall. Under this Alternative, the design for the Civic Park would either retain all four of the Mall's character-defining features as they exist today and in their current locations, or they would be retained and reused within the Civic Park in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings (Standards). While this is a possible outcome under the Project, it is a definite outcome under this Alternative. As a result, if the mitigation identified for the Project is fully implemented, impacts on historic resources under both the Project and the Alternative Design Alternative would be the same and less than significant. However, in the event that the Project's mitigation measures cannot be fully

implemented as part of the Alternative Design Alternative, then impacts under the Alternative Design Alternative would be very different when compared to those of the Project. The difference being that impacts on the historic resources within the Civic Center Mall, when compared to the Project, would be substantially reduced and would be less than significant, in contrast to the significant impact that could occur under the Project.

Under the Alternative Design Alternative, the implementation of the Grand Avenue streetscape program would be the same, as under the proposed Project. Although implementation of the conceptual plan for the Grand Avenue streetscape program would not significantly impact the cultural context of adjacent resources, potentially significant impacts could result if the final design for the streetscape program obscures visual access to those historic resources. However, with the application of the mitigation measures identified for the Project, impacts of the Alternative Design Alternative, relative to the Grand Avenue streetscape program, would be similar and less than significant.

The change in the locations of the towers on Parcels L and M-2 would not have any effect on historic resources as development on Parcels Q, W-1/W-2, L, and M-2 under the Project has no effect on historic resources. All of other development components of this Alternative would be the same as under the Project and would have a less than significant impact on historical and cultural resources.

(5) Population, Housing and Employment

The Alternative Design Alternative would have the same types and amounts of development as the Project with County Office Building Option and, therefore, the same amounts of housing, population and employment. As is the case with the Project, population, housing and employment growth projections would not be exceeded under the Alternative Design Alternative, and impacts regarding growth would be less than significant.

As is the case with the Project, the Alternative Design Alternative would be supportive of plans and policies for development in the Central City Community Plan/Downtown area. Therefore, development under this Alternative would be consistent with the applicable plans and policies for development in the downtown area, and the Central City Community Plan. As is the case with the Project, impacts of the Alternative regarding consistency with plans and policies would be less than significant.

(6) Air Quality

Under the Alternative Design Alternative, construction activities would be similar to the Project with County Office Building Option, since the scope of development regarding the Civic

Park, the Grand Avenue streetscape program, and development of the five parcels would be similar. As with the Project, construction of this Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be similar under the Alternative Design Alternative. Construction emissions generated by the Alternative Design Alternative would be similar to the proposed Project and would be significant and unavoidable. Localized pollutant construction impacts would also be similar to the proposed Project with County Office Building Option as both the intensity and duration of excavation and grading would be similar, and would also be significant.

The number of daily trips generated by this Alternative would be the same as under the Project with County Office Building Option. The total contributions to regional emissions under this Alternative would remain significant, as is the case with the proposed Project with County Office Building Option. As with the Project, this Alternative would result in significant regional air quality impacts for CO, NO_x, and VOC, and PM₁₀. Construction and operational air quality impacts under this Alternative would be the same as under the Project and, therefore, the Alternative Design Alternative would not avoid or reduce the Project with County Office Building Option's significant air quality impacts.

(7) Noise

Under the Alternative Design Alternative, construction activities would be similar to the Project with County Office Building Option, since the scope of development regarding the Civic Park, the Grand Avenue streetscape program, and development of the five parcels would be similar. Because the type of construction associated with this Alternative would be similar to the proposed Project with County Office Building Option, daily construction-related noise levels experienced both within the Project site and the immediate vicinity would be similar to the proposed Project and are considered significant.

The on-site equipment and activity noise levels associated with the Project are not considered significant and would be similar with this Alternative. Total daily traffic would be the same as under the Project with County Office Building Option. Since the scope of development would be the same under this Alternative, it would not reduce or avoid the Project's potentially significant construction noise impacts or less than significant operations noise impacts.

(8) Hazardous Materials

The changes to the Project with County Office Building Option that are reflected in the Alternative Design Alternative would not change the amount of site preparation as what is

forecasted to occur under the Project with County Office Building Option. Thus, potential exposures to previously unrecorded hazardous materials would be the same under both the Project with County Office Building Option and the Alternative Design Alternative. As with the Project with County Office Building Option, compliance with regulatory measures would reduce potentially significant impacts from any unknown hazardous substances, including untested fill soils, under this Alternative to less than significant levels. All of other components of this Alternative would be the same as under the Project with County Office Building Option and would have a less than significant impact relative to the storage or use of hazardous chemicals used in landscaping or standard building maintenance.

(9) Public Services

(a) Fire Services

The changes to the Project that are reflected in the Alternative Design Alternative would not change the types and amounts of development that would occur at the Project site. Therefore construction activity would have similar effects regarding the chance of construction related incidents requiring emergency response, and impacts on emergency access due to lane closures for construction. Under both the Project and the Alternative Design Alternative, emergency access impacts would be short-term and potentially significant. With the implementation a Construction Traffic Control / Management Plan to be approved by LADOT and distributed to the LAFD, as under the Project, emergency access impacts would be reduced to less than significance and would be similar under both the Project and this Alternative.

Operating characteristics with regard to fire services for the Alternative Design Alternative would also be the same as those associated with the Project. As such, sufficient fire facilities are located within the specified regulatory distances, and the Alternative would be required to provide fire flows, and site/building design to meet standards for fire protection, thus avoiding significant impacts. Impacts of the Alternative Design Alternative would be similar and less than significant, as is the case with Project.

(b) Police

The changes to the Project that are reflected in the Alternative Design Alternative would not change the types and amounts of development that would occur at the Project site. Therefore, construction activity under this Alternative would have similar effects regarding the chance of construction related thefts, and impacts on emergency access due to lane closures for construction. Under both the Project and the Alternative Design Alternative, emergency access impacts would be short-term and potentially significant. With the implementation a Construction Traffic Control / Management Plan to be approved by LADOT and distributed to

the LAPD, required under Mitigation Measure B-1, described in Section IV.B of this Draft EIR, emergency access impacts would be similar and reduced to less than significance and under both the Project and this Alternative.

The Alternative Design Alternative would introduce the same new population to the Project site, as is the case with the Project with County Office Building Option. With private security, especially for park activities, and mitigation measures for site safety and protection, impacts for the Alternative Design Alternative, as is the case for the Project, would be less than significant. Therefore, service ratios with the Alternative Design Alternative would be the same as the service ratios with the Project with County Office Building Option. As a result, police impacts under this Alternative, as is the case with the Project, would be less than significant.

(c) Schools

The Alternative Design Alternative would generate the same number of new residents and employees as the Project with County Office Building Option, and would therefore generate the same number of students: 250 elementary school students, 141 middle school students, and 169 high school students for a total of 560 students. In contrast, the Project with Additional Residential Development Option would generate 632 local LAUSD students, consisting of 314 elementary school students, 157 middle school students, and 161 high school students. Therefore, the Alternative Design Alternative represents a reduction of 72 students, or approximately 11 percent less than the 632 students under the Project with Additional Residential Development Option. The analysis of the impacts of the Project with Additional Residential Development Option indicates that the Project's students would exceed anticipated seating capacity at Castelar and Gatts Elementary Schools, even after the development of new schools in the area. In addition, the additional students would not exceed the capacity of the middle school and high school facilities an increased capacity would be made available through planned new schools that would be open by 2009. Impacts of the Alternative Design Alternative, as is the case with the Project, would be fully mitigated through the payment of fees for new schools per California Government Code Section 65995. All of the other development components of this Alternative would be the same as under the Project and would have no impact on school services. As such, the impacts of the Alternative Design Alternative, as is the case with the Project with Additional Residential Development Option, would also be less than significant.

(d) Parks and Recreation

The Alternative Design Alternative would require construction within the existing Civic Center Mall to create the proposed Civic Park, and, as such, would result in the same potentially significant, short-term impact on park and recreation services as the Project.

The Alternative Design Alternative would develop up to 2,060 housing units and would, therefore, generate the same new populace, 2,925 residents. In contrast, the Project with Additional Residential Development Option would contain 600 additional residential units and would generate approximately 3,777 new residents. As with the Project with Additional Residential Development Option, the Alternative Design Alternative's new population would seek out recreational opportunities and increase the demand for park and recreation services in the Project area. The Alternative Design Alternative would also include the 16-acre Civic Park, with amenities that could be similar to those of the Project.

The analysis of the Project's impacts on park space addresses the additional demand on park space that would be generated by the Project's added population, pursuant to the City methods for analyzing and providing new park space for City residents. The analysis recognizes that the Project would be required to meet the City's Quimby requirements through the provision of dedicated park space at a rate of 3 acres per 1,000 population, payment of in-lieu fees, or a combination of the two. As the implementation of this requirement is based on the number of residents within a project, the Alternative Design Alternative would provide parks contributions that are similar to those of the Project with Alternative Design Alternative. In all of these cases, the contributions to the City's park facilities are provided on a per capita base and are therefore equivalent in regard to their respective populations. As such, both the Project and the Alternative Design Alternative would accommodate their respective additional park demands, provide similar levels of service and avoid a significant impact on parks and recreation services. However, since the Alternative Design Alternative would have incrementally less population, the impacts on parks and recreational services would be incrementally less than under the Project with Additional Residential Development Option

The Project with Additional Residential Development Option as well as the Alternative Design Alternative would include improvements within the Civic Park. While the nature of the improvements under the Alternative Design Alternative may be different than those of the Project, they nevertheless would each provide regional park benefits in addition to meeting the needs of their respective populations.

(e) Libraries

The Alternative Design Alternative would develop up to 2,060 housing units and would generate approximately 2,925 residents. The added population would make use of nearby libraries, and increase the demand for library services. In addition, its employees might also use the downtown Central Library, a regional facility, and/or other nearby libraries. In contrast, the Project with Additional Residential Option, with up to 2,660 housing units, would generate 3,777 new residents. The analysis of the Project with Additional Residential Option's impacts on library services indicates that its population of 3,777 new residents is not expected to exceed the

libraries' defined target service population, nor require library expansion. Demand for library services would be incrementally less under the Alternative Design Alternative and less than significant under both the Project with Additional Residential Option and Alternative Design Alternative.

(10) Utilities

(a) Water Supply

Construction of the Alternative Design Alternative would require hook-ups to the existing water main lines that are similar to those of the Project with County Office Building Option. The installation of these hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. Water would be used during construction for dust suppression and other construction-related activities. Such water usage would be intermittent, temporary, and less than that of the completed development. Impacts on water supply during construction would be somewhat similar and less than significant under the Project as well as the Alternative Design Alternative.

The Alternative Design Alternative would have the same types and amounts of development as the Project and therefore the demand for water consumption would be the same. As indicated in the analysis of the impacts of the Project on water consumption, above, water infrastructure and water supply is sufficient to meet these demands, as well as requirements for fire flow. Therefore, the impacts on water consumption and conveyance for the Alternative Design Alternative, as is the case with the Project, would be less than significant.

(b) Wastewater

Construction of the Alternative Design Alternative would require hook-ups to the sewer lines that are similar to those of the Project. These hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. It is anticipated that portable toilets would be provided and maintained by a private, contracted vendor during the construction phase of the Project, and that the vendor would dispose of waste off-site. Therefore, wastewater generation during construction would be negligible. Impacts of the Alternative Design Alternative on wastewater generation during construction would be somewhat similar to those of the Project and, thus, less than significant. The Alternative Design Alternative would have the same types and amounts of development as the proposed Project and therefore the wastewater generation would be same. As indicated in the analysis of the impacts of the Project on water consumption, above, wastewater infrastructure and capacity is sufficient to meet these demands. Therefore, impacts on wastewater generation and conveyance for the Alternative Design Alternative, as is the case with the Project, would be less than significant. All of other

components of this Alternative would be the same as under the Project and would have a less than significant impact relative to wastewater generation.

(c) Solid Waste

The Alternative Design Alternative would have the same types and amounts of development as the Project with County Office Building Option; and therefore, the Alternative Design Alternative would generate waste debris from construction activities that is the same as the Project's. The Project and the Alternative Design Alternative would generate an equivalent amount of waste and, as with the Project, impacts associated with construction solid waste would be less than significant and similar. Also, the solid waste disposal from operations of the Alternative Design Alternative would be the same as the Project. The analysis of the Project's solid waste impacts indicates that the inert land-fills that would accept the construction debris have an estimated 60 year capacity. Further, the Project's solid waste due to operations would comprise less than 0.001 percent of the 9.11 million tons of total waste generated within the City of Los Angeles and disposed of daily at major landfills in the region, and planning for future needs is being based on a 15 years projected needs bases. Therefore, impacts of the Project and the Alternative Design Alternative would be the same and less than significant. All of other components of this Alternative would be the same as under the Project and would have a less than significant impact on solid waste generation.

c. Relationship of Alternative Design Alternative to the Project Objectives

As with the Project, the Alternative Design Alternative would meet the ultimate goal of the Project to provide an economically viable, architecturally distinguished, community-oriented, mixed-use development with notable public open spaces that would create, define, and celebrate the Civic and Cultural Center as a regional destination. In addition, the Alternative design Alternative would meet all the Project's priority objectives. It would meet the priority objective to create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, through a mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill. It would meet the priority objective to implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design, in order to create a pleasant living and working environment. This Alternative would meet the priority objective to generate at least \$50 million in funds from the Project itself, and at least \$45 million from Phase 1, by the lease of public land, and to then use these funds to improve and extend the existing Civic Center Mall into a Civic Park that can serve as a public gathering place for the entire region. In addition, this Alternative would meet the priority objectives to provide 20 percent of all residential units are affordable units and to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County.

This Alternative would meet all of the Project's specific objectives that are intended to ensure that the proposed development would generate specific public benefits, activate downtown Los Angeles, create a civic gathering place, enhance pedestrian connections, create distinguished architectural design, facilitate achievement of redevelopment goals for the Bunker Hill District and the amended Central Business District Redevelopment Plans. .

Through the retention of historically significant character-defining features, the Alternative Design Alternative would avoid the Project's potential significant impact on the historic resources present within the existing Civic Center Mall, and reduce, but not eliminate, the Project's significant view impact for the residents of the Grand Promenade Tower building that have northerly views. However, the Alternative Design Alternative would not avoid the Project's significant and unavoidable impacts associated with zoning compliance, construction hauling, lane closures, periodic closures of the Civic Mall Garage's Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Mall during their reconstruction. intersection service levels, DAARP residential parking requirements, views from locations other than the Grand Promenade Tower apartments, air quality (construction and operation), noise (construction). This Alternative would avoid the Project' potentially significant impacts on character-defining features in the existing Civic Center Mall.

5. Alternative 5: Alternative Land Use

a. Introduction and Description of the Alternative Land Use Alternative

Under the Alternative Land Use alternative, the five development parcels would be developed entirely with residential uses, with the exception of 35,000 square feet of retail uses that would be developed to meet the retail shopping needs of onsite residents. This alternative would have the same floor area as the Project with County Office Building Option (3.6 million square feet). Under this Alternative , the floor area that would, otherwise, support office, hotel, and retail uses, except for 35,000 square feet, would be converted to residential floor area. The proposed 35,000 square feet of retail uses would be consolidated onto Parcel Q, which is centrally located to Parcels L, M-2, and W-1/W-2. Retail uses may include a grocery and similar services specifically oriented toward the Project's residents. The number of additional residential units is based on the non-residential floor area in each parcel(s), divided by the average floor area per unit within the applicable parcel. As such, the non-residential floor area within Parcel Q would support an additional 446 units, which, when added to the proposed 500 units would equal 946 units. On Parcels W-1/W-2, the non-residential floor area would support an additional 763 units. Added to the proposed 710 units (under the County Office Building Option), a total of 1,473 units would be developed on Parcels W-1/W-2 under the Alternative Land Use Alternative. The non-residential floor area proposed for Parcels L and M-2 would

support 103 additional units, for a total of 953 units. On an overall basis, the Alternative Design Alternative would allow a maximum of 3,372 residential units, including 674 affordable units.

Under the Alternative Land Use Alternative, the implementation of the Civic Park and Grand Avenue Conceptual Plans would be the same as under the Project. The Alternative Land Use Alternative is compared to the County Office Building Option in Table 111 on page 829. As shown in Table 111, Alternative 5 would have a 63.6 percent increase in total residential units, a 92.2 percent decrease in retail floor area, and a 100 percent decrease in office and hotel uses, compared to the Project with County Office Building Option. The components of the Alternative Land Use Alternative are compared to the Project and Alternatives 1 through 4 in Table 119 on page 848.

b. Analysis of Alternatives

(1) Land Use

The Alternative Land Use Alternative includes a maximum of 3,372 residential units, including 674 affordable units a total of 35,000 square feet of retail uses within Parcel Q that would be oriented to specifically serving the retail needs of the on-site residents. The proposed residential development and retail uses would be compatible with existing surrounding residential development, which includes the Grand Promenade Tower residential use to the south of Parcels L and M-2, Bunker Hill Towers to the west of Parcels L and M-2, the Angelus Plaza senior residential complex to the south of Parcels W-1/W-2, and the Museum Tower residential building across Olive Street from the Angelus Plaza. This Alternative would be compatible with the use and scale of surrounding residential uses since, as is the existing surrounding residential development, it would be multi-family and developed within modern high-rise buildings.

The Alternative Land Use Alternative would be identical to the Project in relation to total floor area, although building heights on Parcel Q may not be as tall as building heights under the Project. No street-front retail uses, restaurants, or other entertainment uses for tourists or the general public would be provided. The Alternative Land Use Alternative would not meet the land use objectives of the General Plan Framework to provide for a diversity of uses that would support the needs of the City's residents, businesses, and visitors (Objective 3.1), or provide for the continuation of the expansion of visitor-serving uses (Objective 3.11), or focus mixed commercial/residential uses around urban transit stations (Objective 3.15). The Alternative Land Use Alternative would be less consistent than the Project with County Office Building Option with General Plan Framework Objective 3.16 in that it would not enhance pedestrian activity through an integrated interface with the Grand Avenue streetscape of street front retail uses and restaurants, as would the Project with County Office Building Option. The Alternative Land Use Alternative would also not be consistent with the commercial objectives of the Central City

Table 111

Alternative 5
Comparison of the Project with County Office Building Option and the Alternative Land Use Alternative

Components	County Office Building Option	Alternative 5	Numerical Difference	percent Change
Retail Floor Area				
Parcel Q	284,000 sq. ft.	35,000 sq. ft.	- 249,000 sq. ft.	87.7 percent decrease
Parcels W-1/W-2	64,000 sq. ft.	0	- 64,000 sq. ft.	100 percent decrease
Parcels L and M-2	101,000 sq. ft.	0	- 101,000 sq. ft.	100 percent decrease
Total Retail Floor Area	449,000 sq. ft.	35,000 sq. ft.	- 414,000 sq. ft.	92.2 percent decrease
Total Hotel Floor Area	315,000 sq. ft.	0	- 315,000 sq. ft.	100 percent decrease
Total Office Floor Area	680,000 sq. ft.	0	- 680,000 sq. ft.	100 percent decrease
Total Residential Floor Area	2,155,000 sq. ft.	3,565,000 sq. ft.	+1,410,000 sq. ft.	65.4 percent increase
Residential Units				
Parcel Q	500 units	946 units	+446 units	89.2 percent increase
Parcels W-1/W-2	710 units	1,473 units	+763 units	107.5 percent increase
Parcels L and M-2	850 units	953 units	+103 units	12.1 percent increase
Total residential units	2,060 units	3,372 units	+1,312 units	63.6 percent increase
Total affordable units	412 units	674 units	+ 262 units	63.6 percent increase
Total Floor Area:	3,600,000 sq. ft.	3,600,000 sq. ft.	0	No change
Conceptual Civic Park Plan	16 acres	16 acres	0	No change
Grand Avenue Streetscape Plan	Fifth St. to Cesar E. Chavez Ave.	Fifth St. to Cesar E. Chavez Ave.	0	No change

Source: PCR Services Corporation, April 2006

Community Plan, which promote land uses that address the needs of visitors for business and tourism (Objective 2-3) or encourage a mix of uses which create a 24-hour downtown environment for current residents and which could foster increased tourism (Objective 2-4). The Alternative Land Use Alternative is also not consistent with the objectives of the existing Bunker Hill Design for Development, which recommend substantial quantities of retail, restaurant, and entertainment facilities along the within the upper reaches of Bunker Hill.

The Alternative Land Use Alternative would also not support the policies of the Downtown Strategic Plan to encourage activity generators that support tourism, such as hotels in the Civic Center District. On the other hand, the Alternative Land Use Alternative would support the policies of the Downtown Strategic Plan for the establishment of vibrant neighborhoods containing a variety of community facilities, as well as housing types. The Alternative Land Use Alternative would not be consistent with the existing C2 zoning on Parcels Q and W-1/W-2 and, as such, would require a zone change for these parcels. As with the Project with County Office Building Option, the Alternative Land Use Alternative would have a potentially significant impact relative to zoning compliance. Because the Alternative Land Use

Alternative in comparison to the Project would advance many fewer policies and objectives as set forth in the applicable land use plans for the creation of mixed uses in the downtown that serve the surrounding community and region, it would be less environmentally advantageous than the Project with County Office Building Option in relation to land use plans and policies.

(2) Transportation, Circulation, and Parking

(a) Construction

Under the Alternative Land Use Alternative, construction activities would be similar to the Project with the County Office Building Option, since the Alternative Land Use Alternative would not change the Project with the County Office Building Option's phasing or total square footage of development. As such, no change in trips generated by construction activities or disruption of streets and sidewalks due to construction activities would occur under this Alternative. As with the Project, this Alternative would generate up to 300 haul trucks a day during peak construction periods. Since many of these trips would occur during the A.M. peak hour short-term construction impacts associated with hauling in the A.M. hours would occur during the initial demolition hauling phases. This Alternative would also generate a potentially significant traffic impact associated with the periodic closures of the Civic Mall's Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Mall during their reconstruction. Both the Project and this Alternative would be required to implement a Construction Traffic Control/Management Plan. With the implementation of the Construction Traffic Control/ Management Plan, short-term construction haul truck impacts and traffic impacts associated with the periodic closure of the ramps to the garage beneath the existing Civic Center Mall during their reconstruction would be reduced, but not eliminated. As such, construction traffic impacts would be similar and potentially significant under both the Project with County Office Building Option and the Alternative Land Use Alternative.

(b) Traffic and Circulation

All trip totals would be reduced proportionally under the Alternative Land Use Alternative. As shown in Table 112 on page 831, this Alternative would generate approximately 45 percent fewer trips in the A.M. peak hour compared to the Project with County Office Building Option. The Alternative Land Use Alternative would generate approximately 42 percent fewer trips in the P.M. peak hour compared to the Project with County Office Building Option. This Alternative would, therefore, generate fewer traffic impacts than the Project with County Office Building Option. Table 11-11 in the Mobility Group and FPL & Associates Traffic Study shows trip generation by parcel and by land uses, with detailed trip generation calculations shown in the Mobility Group and FPL & Associates Traffic Study Appendix C, contained in Appendix B of this Draft EIR.

Table 112**Comparison of Peak Hour Trips - Alternative Land Use Alternative**

A.M. Peak Hour Trips					
Project with County Office Building Option			Alternative Design Alternative		
In	Out	Total	In	Out	Total
919	632	1,551	180	669	849

P.M. Peak Hour Trips					
Project with County Office Building Option			Alternative Design Alternative		
In	Out	Total	In	Out	Total
1,120	1,344	2,464	646	425	1,071

Source: The Mobility Group and FPL & Associates, 2006

It is likely that this Alternative would not create CMP and freeway impacts, because the number of P.M. peak hour trips would be less than the Project, and the Project with County Office Building Option's CMP/freeway impacts discussed in Section IV.B in this Draft EIR are only marginally above the threshold of significance. As with the Project, this Alternative would generate potentially significant short-term traffic congestion associated with large festivals and other special events in the Civic Park.

(c) Transit

Estimated transit ridership is based on a percentage of projected vehicle trips. As such, the Alternative Land Use Alternative would generate fewer A.M. and P.M. peak hour transit riders than the Project with County Office Building Option. As with the Project with County Office Building Option, the Alternative Land Use Alternative would have a less than significant impact on transit capacity. However, since the Alternative Land Use would generate less demand on transit during both peak hours than the Project with County Office Building Option, it would have less impact on transit capacity.

(d) Parking

The Alternative Land Use Alternative would provide code-required parking, as would the Project with County Office Building Option. As with the Project, the Alternative Land Use Alternative would require the removal of 1,567 existing parking spaces located on Parcels Q, W-1, L, and M-2, 145 spaces on Parcel W-1, and 385 existing parking spaces located in the Civic Center Mall surface parking lot. In addition, 33 on-street parking spaces would be removed, as under the Project. Compared to the Project with County Office Building Option, under which the combined LAMC the DAARP would require 5,413 parking spaces, the combined LAMC and

DAARP requirement for the Alternative Land Use Alternative would be 6,758 spaces. Under the LAMC, alone, LAMC and DAARP-required parking for the County Office Building Option would be 3,377 spaces. The combined LAMC and DAARP parking requirements are higher than the LAMC requirements, alone, since the DAARP-required parking is higher per dwelling unit than under the LAMC. As with the Project, this Alternative would not be consistent with the DAARP and would seek a variance/deviation from the DAARP for condominium parking supply, as described for the Project in Section IV.B of the Draft EIR. The amount of parking required under the LAMC for this Alternative would be approximately 2 to 3 percent higher than under the Project with County Office Building Option. A summary of parking requirements is presented in Table 11-12 in the Mobility Group and FPL & Associates Traffic Study in Appendix B of this Draft EIR.

As with the Project with County Office Building Option, parking would be exceed LAMC requirements and be based on peak demand. As shown in Table 113 on page 833, peak commercial parking demands for this Alternative would be negligible compared to the Project with County Office Building Option. As for the Project with County Office Building Option, there would be no significant off-street parking impacts due to this Alternative.

(3) Aesthetics/Visual Resources

(a) Visual Quality

(i) Construction

Under the Alternative Land Use Alternative, construction activities would be the same as under the Project with County Office Building Option. Any visual contrast and general disruption in the aesthetic character of the area caused by excavation and construction of new structures and park and streetscape facilities would be the same. The duration and phasing of construction would be the same as under the Project as the same amount of square footage is being developed under this Alternative. With mitigation, construction activities associated with the Alternative Land Use Alternative, as with the Project with County Office Building Option, would not substantially alter, degrade, or eliminate the existing visual character of the area. Visual quality impacts associated with construction would be similar and less than significant under the Project with County Office Building Option and the Alternative Land Use Alternative.

(ii) Operation

a. Visual Quality

The Alternative Land Use Alternative would not provide street front retail or restaurant uses, or interior plazas available to the public and, as such, the aesthetic ambience that would be

Table 113

Peak Commercial Parking Demands Comparison – Alternative Land Use Alternative

Period	Parcel Q		Parcel W-1/W-2		Parcels L and M-2		Total	
	Project with County Office Building Option	Alternative Land Use Alternative	Project with County Office Building Option	Alternative Land Use Alternative	Project with County Office Building Option	Alternative Land Use Alternative	Project with County Office Building Option	Alternative Land Use Alternative
Weekday								
Day	753	77	1,835	0	238	0	2,826	77
Eve	982	78	1,845	0	254	0	3,081	78
Weekend								
Day	900	91	1,866	0	279	0	3,045	91
Eve	1,013	80	1,855	0	270	0	3,136	80

Source: *The Mobility Group and FPL & Associates, 2006*

created by a varied street front and a variety of uses would not be achieved. The visual quality of the Alternative Land Use Alternative would be less than under the Project with County Office Building Option. This alternative may not be developed to the same height as the Project with regards to Parcel Q, since the distinctive hotel/residential tower would not be constructed. Also, without the interface of restaurants and retail uses with the sidewalk and other public access areas, this Alternative would not create the same interesting street ambience, nor the same visual interest, as the Project. Although the Alternative Land Use Alternative would not create a significant visual quality impact, the Alternative Land Use Alternative would be less advantageous than the Project with County Office Building Option in relation to overall visual quality.

b. Views

The Alternative Land Use Alternative would feature the same configuration of buildings and building heights as under the Project with County Office Building Option. Under Alternative Land Use Alternative, the development of Parcels Q, W-1/W-2, L, and M-2 would block views of the horizon and/or mountains from the Grand Promenade Tower high-rise, views of City Hall from Olive Street, and views of the horizon and/or mountains from the upper stories of the Museum Tower, as under the Project with County Office Building Option. The Alternative Land Use Alternative would not reduce or avoid the Project with County Office Building Option's potentially significant view impacts.

c. Light and Glare

The Alternative Land Use Alternative would generate less ambient light than the Project with County Office Building Option, although ambient light associated with spillage from building windows would be similar. However, the illuminated signage associated with retail uses along the street fronts and street and sidewalk lighting would be considerably less under this Alternative than under the Project with County Office Building Option. Any onsite retail uses would be limited to Parcel Q, and would be intended to solely serve the needs of the onsite residents. As with the Project with County Office Building Option, the Alternative Land Use Alternative could result in potential glare impacts from reflected sunlight off building facades and, as with the Project with County Office Building Option, mitigation in the form of site-plan review, careful use of non-reflective surface materials, and a glare analysis prior to construction would reduce potential glare impacts under this Alternative to a less than significant level. The Alternative Land Use Alternative would be more environmentally advantageous than the Project with County Office Building Option in relation to artificial light and glare associated with signage.

d. Shade/Shadow

The Alternative Land Use Alternative would generate the same shade/shadows impacts as the Project with the County Office Building Option since building heights under both the Project and this Alternative would be the same. Although both the Project and the Alternative Design Alternative would create new shading of sensitive receptor locations, neither would result in a significant shade/shadow impact.

(4) Historical Resources

The Alternative Land Use Alternative would implement the Grand Avenue streetscape program and the Civic Park in the same manner as that proposed to occur under the Project. As a result, the impacts of the Alternative Land Use Alternative relative to these Project components would be the same. With the implementation of the recommended streetscape mitigation measures, impacts attributable to the streetscape program under this Alternative would be less than significant, as is the case with the Project. With regard to the Civic Park, as is also the case with the Project, the Alternative Land Use Alternative would result in similar and less than significant impacts if the four character-defining features of the Civic Center Mall are retained and reused within the Civic Park in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings (Standards). However, in the event the Civic Park mitigation measures cannot be fully implemented, the Alternative Land Use Alternative, as is also the case with the Project, would result in significant historic resource impact. The changes in the types of development on Parcels Q, W-1/W-2, L, and M-2 under the Alternative Land Use Alternative would have no effect on the Project's potential historic impacts as Project development on these parcels has no effect on historic resources.

(5) Population, Housing and Employment

Under the Alternative Land Use Alternative, there would be increases in the amount of housing and population in the Project area, and a decrease in the amount of employment, as compared to the Project. As shown in Table 114 on page 836, there would be 3,372 housing units, with a population of 4,788, an increase of 1,863, or 64 percent more, than the Project with County Office Building Option and the number of affordable units would be increased from 412 units to 638 units under this Alternative. Furthermore, there would only be 100 employees under this Alternative in contrast to the Project with County Office Building Option's 3,930 employees, a reduction of 97 percent. The increases in population, and housing would represent slightly increased amounts of the expected growth in the City of Los Angeles Subregion over that of the Project with County Office Building Option's. The population would be 2.7 percent of the growth (in contrast to the Project's 1.7 percent), and the number of households would be 2.9 percent (in contrast to the Project's 1.8 percent). The number of

Table 114

Alternative 5 - Population and Employment

Population

Total Housing Units	3,372
Average Household Size	1.42 ^a
Total Population ^b	4,788

	<u>Proposed</u>	<u>Factor^c</u>	<u>Total Employment</u>
Employment			
Retail	35,000 sq.ft.	500 sq.ft./employee	70
Park	16 acres	0.65 employees/acre	10
Park Restaurant	<u>10,000 sq.ft</u>	500 sq.ft./employee	<u>20</u>
Total			100

^a Household size is based on the 2004 household size for the Project's Census Tract.

^b Assumes 100 percent occupancy.

^c Based on data provided in the Institute of Transportation Engineers, Sixth Edition, 1997.

Source: PCR Services Corporation, 2006

employees would be only 0.04 percent of the expected employment growth (in contrast to the Project's 1.8 percent). As is the case with the Project, the growth represented by this Alternative would be substantially less than the projected growth in the City of Los Angeles Subregion. As was the case with the Project, population, housing and employment growth projections would not be exceeded; and impacts regarding growth would be less than significant. At the subregional level, impacts of the Alternative Land Use Alternative and the Project would be similar.

The Alternative Land Use Alternative would also be supportive of plans and policies for development in the Central City Community Plan/Downtown area; although in a manner that varies from that of the Project. The Alternative Land Use Alternative would support policies that encourage (1) increases in the housing stock and the availability of affordable units, (2) placement of housing in the jobs-rich downtown area, and (3) placement of housing at the hub of transportation, public transportation and pedestrian route opportunities. Further, with increased housing density, this Alternative would provide greater support for these policies than the Project with County Office Building Option. At the same time it would offer less support than the Project with regard to the creation of employment opportunities, and increased vibrancy in the downtown area. The Alternative Land Use Alternative would provide a greater housing base to meet the housing needs of employees in the larger vicinity, whereas the Project would offer a greater integration of employment and housing within the immediate Project area. Since the Project and the Alternative Land Use Alternative all support local plans and policies, and each has relative advantages and disadvantages vis-à-vis those policies, their impacts on plan

consistency for population, housing and employment would be considered to be, on-net, similar and less than significant.

(6) Air Quality

Under the Alternative Land Use Alternative, construction activities would be similar to the Project with County Office Building Option, since the scope of development regarding the Civic Park, the Grand Avenue streetscape program, and development of the five parcels would be similar. As with the Project with County Office Building Option, construction of this Alternative would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. As the overall amount of site preparation and building construction would be similar under the Alternative Design Alternative. Construction emissions generated by the Alternative Design Alternative would be similar to the proposed Project with County Office Building Option and would be significant and unavoidable. Localized pollutant construction impacts would also be similar to the proposed Project with County Office Building Option as both the intensity and duration of excavation and grading would be similar, and would also be significant.

The number of daily trips generated by this Alternative (12,187 ADT) would be 46 percent less than under the Project with County Office Building Option (22,601), resulting in proportionate decreases in mobile air quality emissions. The total contribution to regional emissions under this Alternative would be significant, as is the case with the Project with County Office Building Option. Although, this Alternative would result in significant regional air quality impacts for CO, NO_x, VOC, and PM₁₀, emissions would be incrementally reduced.

Localized air quality impacts are determined mainly by the peak hour intersection traffic volumes. Compared to the proposed Project, this Alternative is forecasted to generate approximately 45 percent fewer trips during the A.M. peak hour and 22 percent fewer trips during the P.M. peak hour. Compared to the proposed Project with County Office Building Option, this Alternative is forecasted to generate approximately 57 percent fewer trips during the peak hour. Since the localized CO hotspot analysis for the proposed Project did not result in any significant impacts, this Alternative would likewise not have any localized impacts due to fewer trips generated.

(7) Noise

Under the Alternative Land Use Alternative, construction activities would be similar to the Project with County Office Building Option, since the scope of development regarding the Civic Park, the Grand Avenue streetscape program, and development of the five parcels would be similar. Because the type of construction associated with this Alternative would be similar to

the proposed Project with County Office Building Option, daily construction-related noise levels experienced both within the Project site and the immediate vicinity would be similar to the proposed Project and are considered significant.

The on-site equipment and activity noise levels associated with the Project are not considered significant and would be similar with this Alternative. The expected reduction in daily traffic volumes associated with this Alternative (i.e., 45% and 57% reduction during the a.m. and p.m. peak hours, respectively) would yield a reduction in comparison to Project with County Office Building Option traffic noise. As with the proposed Project with County Office Building Option this Alternative would result in a less than significant roadway noise impact.

(8) Hazardous Materials

The Alternative Land Use Alternative would require a similar amount of site preparation as the proposed Project with County Office Building Option. Potential exposure to previously unrecorded hazardous materials would be the same under both the Project and the Alternative Land Use Alternative. As with the Project with County Office Building Option, compliance with regulatory measures would reduce potentially significant impacts from any unknown hazardous substances, including untested fill soils, to less than significant levels.

(9) Public Services

(a) Fire Services

The amount of construction for the Alternative Land Use Alternative would be similar to that of the Project with County Office Building Option (i.e., both consist of 3.6 million square feet of development) and therefore construction activity would have similar effects regarding the chance of construction related incidents requiring emergency response, and impacts on emergency access due to lane closures for construction.

Operating characteristics with regard to fire services for the Alternative Land Use Alternative would also be similar to those of the Project. As is the case with the Project, sufficient fire facilities are located within the specified regulatory distances, and the development would be required to provide fire flows, and site/building design to meet standards for fire protection, thus avoiding significant impacts. Thus, impacts of the Alternative Land Use Alternative would be similar to those of the Project, and as is the case with the Project with County Office Building Option, would be less than significant.

(b) Police

The amount of construction for the Alternative Land Use Alternative would be similar to that of the Project with County Office Building Option and, therefore, construction activity would have similar effects regarding the chance of construction related thefts, and impacts on emergency access due to lane closures for construction. Under the Alternative Land Use Alternative, the duration and scope of construction activities would be similar to the Project. Therefore, as with the Project with County Office Building Option, impacts on police services during construction would be less than significant.

The Alternative Land Use Alternative would introduce a new population to the Project with County Office Building Option site with 4,788 new residents and 100 persons associated with the Alternative's retail uses. This would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 144 residents and there would be an estimated increase in crimes of 754 cases per year, or 2.24 additional crimes that would be handled per year for each officer.

Project operations under the Project with County Office Building Option would result in a reduction in the police service ratio from 1 officer per 130 residents to 1 officer per 152 persons and an estimated increase in crimes of 1,153 cases, or 3.4 crimes more per year for each officer. While impacts would be reduced under the Alternative Land Use Alternative, private security, especially for park activities, and mitigation measures for site safety and protection, would cause impacts under both the Project and the Alternative Land Use Alternative to be less than significant.

(c) Schools

The student generation for the Alternative Land Use Alternative is shown in Table 115 on page 840. As indicated therein, this Alternative would generate a total of 768 students, with 395 elementary school students, 190 middle school students and 183 high school students attending local schools. In contrast, the Project with Additional Residential Development Option would generate 632 local LAUSD students, consisting of 314 elementary school students, 157 middle school students, and 161 high school students. The Alternative Land Use Alternative represents an increase of 136 students, or approximately 21.5 percent more than the 632 students under the Project with Additional Residential Development Option. The analysis of the impacts of the Project indicates that Project students would exceed anticipated seating capacity at Castelar and Gatts Elementary Schools, even after the development of new schools in the area. The students attributable to the Project with Additional Residential Development Option would not exceed the capacity of the middle school and high school facilities with increased capacity that will be made available through planned new schools that will be open by 2009. Project impacts would be

Table 115

Alternative 5 - Estimated Student Generation

A. Residential Component*Condominium Units*

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.0867	2,698	234
Middle	0.0434	2,698	117
High	0.0438	2,698	<u>118</u>
Total Students (Single-Family Attached)			469

Multi-Family Units

School Level	LAUSD Student Generation Rates (Single-Family Attached) ^a	Number of Proposed Dwelling Units	Forecasted Student Generation ^b
Elementary	0.2396	674	161
Middle	0.1070	674	72
High	0.0933	674	<u>63</u>
Total Students (Multi-Family)			296

B. Commercial Component

School Level	Student Generation Rates ^c	Total Number of Employees	percent of Employees within Boundaries	Forecasted Student Generation ^b
Elementary	0.106	100	.02	0
Middle	0.049	100	.13	1
High	0.060	100	.25	<u>2</u>
Total Students (Commercial Component)				3

C. Combined Total from Residential and Commercial

	Elementary	Middle	High	Total
Total Students Generated (Residential and Commercial: Within Attendance Boundaries)	395	190	183	768

^a LAUSD Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004^b Number of Students rounded to the nearest whole number.^c Based on rates generated by LAUSD.

Source: PCR Services Corporation.

mitigated through the payment of fees for new schools per California Government Code Section 65995 and as a result, Project with Additional Residential Development Option impacts would be less than significant.

Impacts of the Alternative Land Use Alternative would be greater than those of the Project; worsening the effects on the projected seating shortage at the elementary schools, and causing significant impacts, prior to mitigation. The increase in students at the middle school and high school levels under the Alternative Land Use Alternative would still fall within (actually well below) the estimated seating capacity that would occur with the development of the new schools. As is the case with the Project, impacts of this Alternative would be mitigated through the payment of developer fees. With the payment of these fees, impacts of the Alternative Land Use Alternative would be less than significant.

(d) Parks and Recreation

The Alternative Land Use Alternative would require construction within the existing Civic Center Mall and, as such, would result in the same potentially significant, short-term impact on park and recreation services as the Project.

The Alternative Land Use Alternative includes 3,372 new housing units, with an additional population of 4,788 residents at the Project site. The new population would seek out recreational opportunities and in so doing would increase the demand for park and recreation services. The Alternative Land Use Alternative would also include the 16-acre civic park, with amenities that are similar to those of the Project.

In contrast, the Project with Additional Residential Development Option would generate 3,777 residents. The analysis of the Project's impacts on park space addresses the additional demand on park space that would be generated by the Project's added population, pursuant to the City methods for analyzing and providing new park space for City residents. The analysis recognizes that the Project would be required to meet the City's Quimby requirements through the provision of dedicated park space at a rate of 3 acres per 1,000 population, payment of in-lieu fees, or a combination of the two. The Alternative Land Use Alternative, with an even greater number of dwelling units, would provide an even greater contribution to park facilities. Regardless, the contributions to the City's park facilities are provided on a per capita base and are therefore equivalent in regard to their respective populations. As such, both the Project and the Reduced Density Alternative would accommodate their respective additional park demands, and avoid a significant impact on parks and recreation services.

The Project and the Alternative Land Use Alternative would include similar improvements to the Civic Park. Thus, each would provide regional park benefits in addition to meeting the needs of their respective populations.

(e) Libraries

The Alternative Land Use Alternative includes 3,372 new housing units, with an additional population of 4,788 residents at the Project site. The added population would make use of nearby libraries, and increase the demand for library services. In addition, this Alternative's few employees might also use the downtown Central Library, a regional facility, and/or other nearby libraries.

In contrast, the Project with Additional Residential Development Option would generate 3,777 residents as well as the employees, visitors and tourists who might use the library facilities. The Project's additional population is not expected to exceed the libraries' defined target service population, nor require library expansion. Therefore, Project impacts are less than significant.

The Alternative Land Use Alternative would generate an incremental increase in demand for library services compared to the Project. However, this demand is not expected to exceed existing library services. Although the impact of this Alternative on library services would be incrementally greater than the Project's less than significant impacts, impact on library services under this Alternative would be less than significant.

(10) Utilities**(a) Water Supply**

Construction of the Alternative Land Use Alternative would require hook-ups to the existing water main lines that are similar to those of the Project with County Office Building Option. The installation of these hookups could affect traffic in the area. Any such impacts would be mitigated through a construction management program. Water would be used during construction for dust suppression and other construction-related activities. Such water usage would be intermittent, temporary, and less than that of the completed development. Impacts on water supply during construction would be somewhat similar and less than significant under the Project as well as the Alternative Land Use Alternative.

The Alternative Land Use Alternative includes 3,372 housing units, 63.6 percent more than the Project with County Office Building Option. It would have no office or hotel uses, and only 35,000 sq. ft. of retail development, a decrease of 92.2 percent. These land use changes result in a reduced level of water consumption. Water consumption for the streetscape would be similar to the Project. As indicated in Table 116 on page 843, water consumption for the park would be the same as that of the Project with County Office Building Option. The total water consumption for the Alternative Land Use Alternative would be 652,937 gallons on an average day and 1,109,993 gallons on a peak day.

Table 116

Alternative 5 - Anticipated Water Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
Commercial						
Retail	35,000	square feet	80	2,800	136	4,760
<i>Subtotal</i>				2,800		4,760
Outdoor Water Use (28% of Consumption)				784		1,333
Total Commercial				3,584		6,093
Residential						
1 bedroom	1,989	dwelling unit	120	238,680	204	405,756
2 bedroom	1,180	dwelling unit	160	188,800	272	320,960
3 bedroom	202	dwelling unit	200	40,400	340	68,680
<i>Subtotal</i>				467,880		795,396
Outdoor Water Use (18% of Consumption)				84,218		143,171
Parking^c	1,141	ksf	20	22,820	34	38,794
Total Residential				552,098		938,567
Streetscape	1	acres	3,650	3,650	6,205	6,205
Park						
Greenscape ^d	16	acres	3,650	41,985	6,205	71,374
Restaurant	10,000	square feet	900	9,000	1,530	15,300
Restrooms	149	fixtures	100	19,800	170	33,660
Total Park				70,785		120,334
Total				652,937		1,109,993

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses are expressed in terms of gpd per 1,000 square feet of floor area.

^b Water consumption factors multiplied by a maximum daily peaking factor of 1.7.

^c 325 square feet per parking space.

^d Net of existing water usage within the park.

Source: PCR Services Corporation, 2006.

The estimated net water demand for the Project with County Office Building Option would be 844,403 gallons on an average day and 1,435,484 gallons on a peak day. Water infrastructure and water supply is sufficient to meet these demands, as well as requirements for fire flow. Therefore, these impacts would be less than significant.

Impacts of the Alternative Land Use Alternative on water consumption would be approximately 23 percent less than those of the proposed Project with County Office Building Option and would, like those impacts, be less than significant.

(b) Wastewater

Construction of the Alternative Land Use Alternative would require hook-ups to the sewer lines that are similar to those of the Project. The installation of these hookups could affect traffic in the area. However, any such impacts would be mitigated through the Project's construction management program. In addition, it is anticipated that portable toilets would be provided and maintained by a private, contracted vendor during the construction phase of the Project, and that the vendor would dispose of waste off-site. Therefore, wastewater generation during construction would be negligible. As such, impacts of the Alternative Land Use Alternative on wastewater generation during construction would be somewhat similar to those of the Project and, thus, less than significant.

The Alternative Land Use Alternative includes 3,372 housing units, 63.6 percent more than the Project with County Office Building Option. It would have no office or hotel uses, and only 35,000 sq. ft. of retail development, a decrease of 92.2 percent. These land use changes would result in a reduced level of wastewater generation. Wastewater generation for Park uses would be the same as the Project. The total wastewater generation for the Alternative Land Use Alternative is shown in Table 117 on page 845. As indicated therein, the wastewater generation under this Alternative would be 499,480 gallons on an average day and 849,116 gallons on a peak day. The Alternative Land Use Alternative is shown in Table 117 on page 845. As indicated therein, the wastewater generation under this Alternative would be 498,280 gallons on an average day and 847,076 gallons on a peak day.

The estimated net wastewater generation for the Project with County Office Building Option is 631,650 gallons per day on average and 1,073,805 gallons on a peak day. Wastewater infrastructure and capacity is sufficient to meet these demands. Therefore, these impacts would be less than significant.

Impacts of the Alternative Land Use Alternative on wastewater generation would be 21 percent less than those of the Project with County Office Building Option and would, like those impacts, be less than significant.

(c) Solid Waste

The Alternative Land Use Alternative would generate waste debris from construction activities. The debris from residential construction (4.38 lbs per square foot and 3,565,000 square feet of construction) and commercial development (4.2 lbs per square foot and 35,000 square feet) would be 7,881 tons. This is similar to the 7,800 tons that would be generated by the Project. The amount of construction debris associated with street and park improvements,

Table 117

Alternative 5 - Anticipated Wastewater Demand

Use Type	Amount of Development	Units	Daily Average Consumption Rate (GPD) ^a	Total (GPD)	Peak Consumption Rate (GPD) ^b	Total (GPD)
Commercial						
Retail	35,000	square feet	80	<u>2,800</u>	136	<u>4,760</u>
Total Commercial				2,800		4,760
Residential						
1 bedroom	1,989	dwelling unit	120	238,680	204	405,756
2 bedroom	1,180	dwelling unit	160	188,800	272	320,960
3 bedroom	202	dwelling unit	200	40,400	340	68,680
Total Residential				467,880		795,396
Park						
Restaurant	10,000	square feet	900	7,800	1,530	13,260
Restrooms	198	fixtures	100	19,800	170	33,660
Total Park				27,600		46,920
Total				498,280		847,076

^a Water consumption calculations are based on rates provided by the City of Los Angeles Bureau of Engineering. Consumption rates for commercial uses are expressed in terms of gpd per 1,000 square feet of floor area.

^b Water consumption factors multiplied by a maximum daily peaking factor of 1.7.

^c net of existing sewage generation within the park

Source: PCR Services Corporation, 2006.

23,232 tons, would be the same as the Project's. The total amount of construction waste with this Alternative, 31,113 tons would be slightly greater than the Project.

The amount of solid waste requiring disposal during operations of the Alternative Land Use Alternative is shown in Table 118 on page 846. As indicated, this Alternative would generate approximately 1,652 tons of solid waste per year, approximately 77 percent less than the 7,072 tons per year under the Project with County Office Building Option. The analysis of the Project's solid waste impacts indicates that the inert land-fills that would accept the construction debris have an estimated 60 year capacity. Further, the Project's solid waste due to operations would comprise less than 0.001 percent of the 9.11 million tons of total waste generated within the City of Los Angeles and disposed of daily at major landfills in the region, and planning for future needs is being based on a 15 years projected needs bases. Therefore, impacts of the Alternative Land Use Alternative, as is the case with the Project, would be less than significant.

Table 118**Alternative 5 - Anticipated Solid Waste**

Use Type	Amount of Development	Units	Employees^b	Disposal Rate (tons/employee/year)^a	Total (tons/year)
Commercial					
Retail	35,000	square feet	100	0.30	
Total Commercial					
Residential	3,372	dwelling unit		0.46	1,551
Park	16	acres	10	0.90	9
Park Restaurant	10,000	square feet	20	3.10	62
Total					1,652

^a Disposal Waste rate calculations are based on CIWMB published units.

^b Derived from factors generated by PCR Services Corporation based on data presented in the Institute of Transportation Engineers, Trip Generation Manual.

Source: PCR Services Corporation

c. Relationship of Alternative Land Use Alternative to the Project Objectives

The Alternative Land Use Alternative, which would not provide a mixture of hotel and retail uses with the proposed residential uses, would not meet the ultimate goal of the Project to provide an economically viable, community- oriented, mixed-use development. In addition, the Alternative Land Use Alternative would meet several of the Project's priority objectives. However, since this Alternative would not provide a hotel and would provide a limited amount of street-front retail uses and restaurants, this Alternative would not meet the priority objective of the Project to the same extent as the Project to create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, through a mix of uses that complement each other. Although this Alternative would implement the Grand Avenue Streetscape Program, with the absence of street-front retail uses and restaurants, this Alternative would not meet the priority objective to create a pleasant living and working environment, to the same degree as the Project. This Alternative would meet the priority objective to generate at least \$50 million in funds from the Project itself, and at least \$45 million from Phase 1, by the lease of public land, and use these funds to improve and extend the existing Los Angeles County Mall into the proposed Civic Park. This Alternative would also meet the priority objective to ensure that 20 percent of all residential units in the Project are affordable units for low-income residents. This objective would also meet the priority objective to create a long-term stream of additional tax revenues for the City, the Community Redevelopment Agency and the County. However, since taxes on residences are less than on commercial uses, this Alternative would not meet this objective to the same extent as the Project.

The Alternative Land Use Alternative would not avoid the Project's significant and unavoidable impacts associated with zoning compliance (due to residential uses in existing C2 zones), construction hauling, lane closures, periodic closures of the Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Garage's during their reconstruction, intersection service levels, occasional traffic congestion during evening and large-scale events in the Civic Park, and DAARP residential parking requirements. However, the Alternative Land Use Alternative would incrementally reduce peak hour traffic. This Alternative would also not avoid the Project's potential significant impacts associated with air quality (construction and operation), noise (construction), and short-term recreational impacts associated with the closure of the existing Civic Center Mall during the construction of the proposed Civic Park.. In addition, the Alternative Land Use Alternative would increase the Project's less than significant demand on school services and reduce the Project's less than significant demand on utilities.

G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require the identification of an environmentally superior alternative to the proposed Project and, if the environmentally superior alternative is the "No Project Alternative," the identification of an environmentally superior alternative from among the remaining alternatives.²⁰¹ An environmentally superior alternative is an alternative to the Project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with a project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the Project.

Selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative. The environmental impacts of the Project and each of the alternatives analyzed are comparatively summarized in Table 119 on page 848. The table indicates whether the environmental impacts associated with each environmental category would be "similar," "greater" or "less" than those of the Project, as determined in the analyses of each alternative.

It is important to note that it can be difficult to make a determination of relative significance because some categories are relatively more or less important, and cannot be simply summed. In some cases, these categories do not create a picture of the nuances of the alternatives analyzed. For instance, under the No Project category, the Hazardous Materials impact is considered less than significant since no development would occur on the Project Site. However, since the potential for hazardous materials exists on the Project site, the No Project

²⁰¹ *CEQA Guidelines, Section 15126.6(e)(2).*

Table 119

**Comparison of Project Specific Impacts
Proposed Project and Project Alternatives**

Impact	The Grand Avenue Project		Alternatives				
	County Office Building Option	Project with Additional Residential Development Option	1. No Project "A"	2. No Project "B"	3. Reduced Density	4. Alternative Design	5. Alternative Land Use
Land Use							
Land Use Compatibility	Less than Significant	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Land Use Plans	Less than Significant	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Zoning	Significant and Unavoidable	Significant and Unavoidable	Less (Less than Significant)	Less (Less than Significant)	Similar (Significant & Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Traffic, Circulation, & Parking							
Traffic (Construction)	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (Significant & Unavoidable)	Less (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)
Traffic (Operation)	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Similar (Significant & Unavoidable)	Less (Significant & Unavoidable)
Civic Park Operation	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant & Unavoidable)	Similar (Significant & Unavoidable)
Transit	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Parking	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (Significant & Unavoidable)	Less (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)

Table 119 (Continued)

**Comparison of Project Specific Impacts
Proposed Project and Project Alternatives**

Impact	The Grand Avenue Project		Alternatives				
	County Office Building Option	Project with Additional Residential Development Option	1. No Project "A"	2. No Project "B"	3. Reduced Density	4. Alternative Design	5. Alternative Land Use
Aesthetics/Visual Resources							
Visual Quality (Construction)	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Visual Quality (Operation)	Less than Significant	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Views	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Less (Significant & Unavoidable)	Similar (Significant & Unavoidable)
Light & Glare	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Shade/Shadow	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Historical Resources	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (No Impact)	Similar (Significant & Unavoidable)	Less (Less than Significant)	Similar (Significant & Unavoidable)
Population, Housing & Employment	Less than Significant	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Air Quality							
Construction	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)

Table 119 (Continued)

**Comparison of Project Specific Impacts
Proposed Project and Project Alternatives**

Impact	The Grand Avenue Project		Alternatives				
	County Office Building Option	Project with Additional Residential Development Option	1. No Project "A"	2. No Project "B"	3. Reduced Density	4. Alternative Design	5. Alternative Land Use
Operation	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Less (Significant & Unavoidable)	Less (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Less (Significant & Unavoidable)
Noise							
Construction	Significant & Unavoidable	Significant & Unavoidable	Less (No Impact)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)	Similar (Significant & Unavoidable)
Operation	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Hazards & Hazardous Materials	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Public Services							
Fire Services	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Police Services	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Schools	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)
Parks & Recreation	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Libraries	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)

Table 119 (Continued)

**Comparison of Project Specific Impacts
Proposed Project and Project Alternatives**

Impact	The Grand Avenue Project		Alternatives				
	County Office Building Option	Project with Additional Residential Development Option	1. No Project "A"	2. No Project "B"	3. Reduced Density	4. Alternative Design	5. Alternative Land Use
Utilities							
Water Service	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Wastewater	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Solid Waste	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)

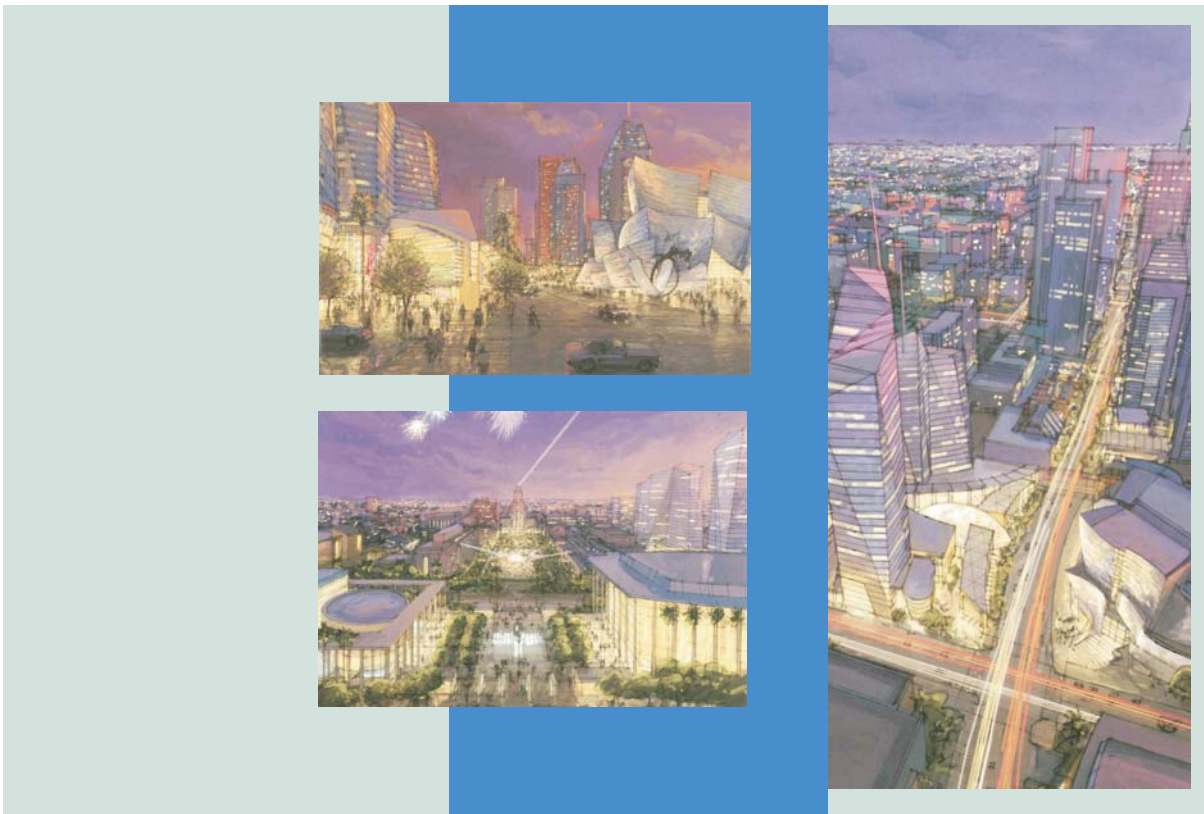
Source: PCR Services Corporation, 2006

alternative would not provide the opportunity for remediation, if needed. Since no remediation would occur under the No Project alternative, and the Project could involve potential exposure, the relative impacts of the No Project Alternative and the Project would be considered similar, although the conclusion is that the impacts would be less since no development would occur.

The environmentally superior alternative (excluding the No Project Alternative) is determined through a review of the Comparison of Impacts Table. The determination of the environmentally superior alternative is based on the environmental impacts of the Project and the alternatives, and not on any assessment of the Alternative's ability to meet the Project objectives. As shown in the Comparison of Impacts Table, the No Project "A" Alternative (Alternative 1) would be the environmentally superior alternative, as this alternative would have less impact relative to the Project than the other evaluated alternatives. CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative needs to be selected as environmentally superior.

In accordance with the procedure outlined above, the Reduced Density Alternative would be the environmentally superior alternative, since it may reduce the Project's impacts more broadly than the other Project alternatives.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS



VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(a) and (b) of the CEQA Guidelines requires that an EIR identify the significant impacts of the Project as well as the Project's significant impacts that cannot be reduced to less than significant levels. With regard to these requirements, Project impacts can be categorized into the following three general categories: (1) impacts concluded to be less than significant; (2) significant impacts that are reduced to less than significant levels with mitigation; and (3) impacts that are significant after mitigation. Project impacts with regard to land use compatibility, consistency with applicable land use plans and regulations, visual quality, shade/shadow, CMP regional highways, CMP transit, and population would be less than significant. Project impacts with regard to light and glare, noise (during Project operation); hazards and hazardous materials, fire, police, schools, parks and recreation, libraries, water supply, wastewater, and solid waste would be reduced to less than significant levels with mitigation. The following is a summary of those Project impacts that are concluded to be significant after mitigation:

1. Land Use

Zoning. Both the Project with County Office Building Option and the Project with Additional Residential Development Option would require zone changes and variances to permit the development proposed for Parcels Q, W-1/W-2, L and M-2. With the granting of such zone changes and variances, which would be granted after certification of the Final EIR by the Lead Agency, this zoning impact would be eliminated. However, since the Project under both Options is not in compliance with the current zoning designations, it is conservatively concluded that for the purposes of CEQA, there would be a significant impact relative to zoning. Based on the information available regarding the related projects, it is reasonable to assume that some of the related projects may require a variety of discretionary zoning actions (e.g., zone changes, variances, etc.). Therefore, a significant cumulative impact with regard to zoning compliance would occur.

2. Traffic, Circulation, and Parking

Haul Truck Traffic. Hauling activities during the initial six to eight months of construction of each block, when haul trucks would carry excavated material from the site, could generate up to 300 truck trips per day. Because some of these trips would occur during the A.M. peak hour, a potentially significant short-term impact may occur. Hauling required for the

construction of some of the 93 related projects would potentially overlap with the initial six to eight months of construction for each of the Project's development parcels. Therefore, haul truck impacts would be cumulatively significant.

Temporary Lane Closures. It is not expected that complete closures of any streets would be required during construction in which case they could cause temporary significant impacts. It is however expected, although this could occur due to unforeseen circumstances, that there would need to be certain temporary traffic lane closures on streets adjacent to the Project site for certain periods, although the specific location and duration of such closures is unknown at this time. It is expected that, at most, one traffic or parking lane adjacent to the curb may need to be closed at certain locations for certain periods of time. Such lane closures could occur for periods of up to 4-6 months, or up to about 18 to 24 months, depending on the stage of construction. Although temporary in nature, such closures could cause significant traffic impacts during such periods of time.

Civic Mall Garage Ramp Reconstruction. The reconfiguration of the ramps to/from the existing Civic Center Mall parking garage during the construction of the Civic Park would require the ramps to be shut down for a period of time. During that time, traffic would have to enter and exit the existing Civic Center Mall garage via either the Hill Street ramps, or via the Music Center garage. Similarly, during the reconfiguration and temporary closure of the Hill Street ramps during the construction of the Civic Park, traffic would have to enter and exit the existing Civic Center Mall garage via the Grand Avenue ramps. The diversion of traffic to alternate garage entrances would only affect the streets in the immediate vicinity of the existing Civic Center, but could potentially create temporary and short-term significant traffic impacts. The temporary closure of access to related project sites would not impact the same streets adjacent to the County Garage block. However, other temporary access closures at any of the other sites, particularly the 15 related projects located on Grand Avenue, Olive Street, and Hill Street, would cumulatively contribute to congestion and, as such, would be cumulatively significant.

Intersection Capacity – Project Operations. The Project with County Office Building Option would result in a significant unavoidable impact on one intersection in the A.M. peak hour and 13 intersections in the P.M. peak hour. All of the impacted intersections would continue to operate at LOS D or better, except for two that would operate at LOS E in the P.M. peak hour (Hope Street / Temple St. / US-101 Ramps, and Broadway / First Street), and two that would operate at LOS F in the P.M. peak hour (Grand Avenue / US-101 / I-110 Ramps, and Hill Street / Third Street). Under the Project with Additional Residential Development Option, no intersections in the A.M. peak hour would be significantly impacted, while seven (7) intersections in the P.M. peak hour would be significantly impacted. All of the significantly impacted intersections would continue to operate at LOS D or better, except for the intersection of Grand Avenue / US-101 / I-110 Ramps, which would operate at LOS F in the P.M. peak hour. Traffic

impacts under the Project with Additional Residential Development Option would not be as great as under the Project with County Office Building Option. The analysis of intersection service levels incorporate cumulative conditions that include related projects and ambient growth.

Civic Park Operations. Early evening events in the Civic Park, or events associated with concerts/programs at the Music Center and the Walt Disney Concert Hall, may worsen traffic conditions in the P.M. peak hour. However, the number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. Annual events, festivals, and holiday events could also potentially have temporary and short-term (one-time) significant traffic impacts. Therefore, on occasion, the size of the event and other factors may cause Civic Park traffic impacts to be significant and unavoidable. During times in which events in the Civic Park would start earlier in the evening, or during annual events, festivals, and holiday events, Civic Park traffic, in combination with traffic generated by the related projects, would be cumulatively significant.

Advisory Agency Residential Parking Policy. Residential parking for the Project would not be consistent with the Deputy Advisory Agency Residential Policy (DAARP), which requires 2.5 spaces for each residential unit. While the proposed residential supply would be less than the Advisory Agency Policy requirements, the Project is seeking an exception from that policy. The granting of the requested exception, should it occur, would be granted after certification of the Final EIR by the Lead Agency, but concurrently with action on the entitlements requested from the City. Should this exception be granted, residential parking impacts would be less than significant. However, until the exception is granted, the non-compliance is considered a significant and unavoidable impact on the project.

3. Aesthetics and Visual Resources

Views. The Project would obstruct views of the Walt Disney Concert Hall and distant vistas to the north, possibly including the San Gabriel Mountains, from the Grand Promenade Tower, a 28-story residential building located immediately south of Parcel M-2. Development on Parcels W-1/W-2 would substantially block views of City Hall from Olive Street, a public street. In addition, development on Parcel Q would block distant vistas to the north, possibly including the San Gabriel Mountains, from the upper stories of the Museum Tower residential building located south of Parcel Q and immediately east of MOCA. Related project No. 88 would block some easterly views of City Hall, from the existing Angelus Plaza residential towers. The Colburn School addition, combined with the Project, would have a significant cumulative view impact on the Museum Tower residential use. Therefore, view impacts are considered to be cumulatively significant.

Shade/Shadow. The Project would result in less than significant shading impacts with regard to the identified sensitive uses, however, a potentially significant cumulative shade/shadow impact would occur with the combined shading of the Angelus Plaza residential complex by Related Projects Nos. 9, 27, and 88 in conjunction with the proposed Project during the morning hours on the summer solstice.

4. Historical Resources

Significant impacts to the existing Civic Center Mall would occur if one or more the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point in the Civic Park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the “hi-fi” speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. Additionally, the Secretary of the Interior’s Standards for the Rehabilitation of Historic Structures (Standards) should be utilized to ensure that the rehabilitation work to the park does not impair those qualities and historic characteristics of these four key character-defining features that convey the property’s significance and qualify it for California Register listing.. If the character-defining features noted above were retained and reused in a manner consistent with the Standards and as stipulated in this Draft EIR, then potential impacts to this resource would not occur and mitigation measures would not be required. However, if the current Civic Park Conceptual Plan is fully implemented in a way that does not retain and reuse the character-defining features noted above in a manner consistent with the Standards,, the recommended mitigation measures are required though they would not reduce the impact to the existing Civic Center Mall to a less than significant level. Nonetheless, such mitigation measures are important to ensure that important information regarding this resource’s contribution to the history of the City of Los Angeles, County of Los Angeles, and the southern California region are retained.

5. Air Quality

Construction. Regional construction activities would exceed the SCAQMD’s daily emission thresholds for regional NO_x, CO and VOC after implementation of all feasible mitigation measures. Construction activities would also exceed the SCAQMD daily localized emission threshold for PM₁₀ and NO₂ , also after implementation of all feasible mitigation measures. Related projects occurring within a similar time frame as the Project would increase short-term emissions for concurrent construction activities during any day of the Project’s construction period. As a result, a significant and unavoidable cumulative impact with respect to construction emissions would occur.

Operations. The Project's operational air emissions would exceed the SCAQMD daily emission threshold for regional CO, VOC, PM₁₀, and NO_x emissions. In addition, and regional concurrent construction and operational emissions would also exceed one SCAQMD's daily thresholds for CO, VOC, PM₁₀, and NO_x. The implementation of the Project would result in an increase in ongoing operational emissions, which would contribute to region-wide emissions on a cumulative basis. Accordingly, under the SCAQMD's methodological framework, the Project's cumulative air quality impacts are also concluded to be significant.

6. Noise

Construction. Construction activities would intermittently increase the daytime noise levels at nearby sensitive land uses by more than the 5-dBA significance threshold. All other noise impacts would be reduced to less than significant levels with mitigation. Noise impacts during construction of the proposed Project and each related project (that has not already been built) would be short-term and limited to the duration of construction and would be localized. However, since noise impacts due to construction of the proposed Project would be significant on its own, noise impacts due to construction of the proposed Project in combination with any of the related projects would also be cumulatively significant without mitigation.

7. Police Services

Although, with the implementation of mitigation measures, the Project's impacts on police protection services or response times would be less than significant, as the list of related projects is extensive and, if all related projects were built, the combined Project and related projects would have a significant cumulative impact with regard to police protection services. However, if the City added resources in response to this growth, then cumulative impacts would be less than significant.

8. Parks and Recreation

Construction of the Project would require the closure of the existing Civic Center Mall for varying durations of time to construct the proposed Civic Park as well as the proposed improvements that are proposed to occur adjacent to the proposed Civic Park. The potential effect of construction on the existing recreational facilities within the existing Civic Center Mall is considered to be an unavoidable and significant, short-term impact. Cumulative impacts on recreational resources are considered significant since the Project would result in a short-term significant impact on a recreational resource.

B. SIGNIFICANT IRREVERSIBLE IMPACTS

Section 15126.2(c) of the CEQA Guidelines requires that an EIR evaluate the significant irreversible environmental changes that would be caused by implementation of a proposed project to ensure that such changes are justified. Irreversible changes include the use of nonrenewable resources during the construction and operation of a project to such a degree that the use of the resource thereafter becomes unlikely. A significant environmental change can result from a primary and/or secondary impact that generally commits future generations to similar uses. Irreversible environmental change can also result from environmental accidents associated with the project.

Construction of the Project would require the use of nonrenewable resources, such as wood, the raw materials in steel, metals such as copper and lead, aggregate materials used in concrete and asphalt such as sand and stone, water, petrochemical construction materials such as plastic, and petroleum based construction materials. In addition, fossil fuels used to power construction vehicles would also be consumed.

Operation of the Project would involve the ongoing consumption of nonrenewable resources, such as electricity, petroleum-based fuels, fossil fuels, and water, which are commonly consumed in the existing surrounding urban environment. Energy resources would be used for heating and cooling of buildings, lighting, and transporting of patrons to and from the Project site. Operation of the Project would occur in accordance with Title 24, Part 6 of the California Code of Regulations, which sets forth conservation practices that would limit the amount of energy consumed by the Project. Nonetheless, the use of such resources would continue to represent a long-term commitment of essentially nonrenewable resources. Operation of the Project would also result in an increased commitment of public maintenance services such as waste disposal and treatment as well as an increased commitment of the infrastructure that serves the Project site.

The limited use of potentially hazardous materials contained in typical cleaning agents and pesticides for landscaping, would occur on the site. Such materials would be used, handled, stored, and disposed of in accordance with applicable government regulations and standards, which would serve to protect against a significant and irreversible environmental change resulting from an accidental release of hazardous materials.

The commitment of the nonrenewable resources required for the construction and operation of the Project would limit the availability of these resources and future development of the Project site with other uses during the life of the Project. However, use of such resources would be of a relatively small scale in relation to the Project's fulfillment of regional and local urban design and development goals for the area. As such, the use of such resources would not be considered significant.

B. GROWTH-INDUCING IMPACTS

1. Introduction

CEQA Sections 15126(d) and 15126.2(d) require that an EIR discuss the ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced or fostered in several general ways listed as follows:

- Direct growth associated with a project;
- Creation of demand not satisfied within a project;
- Creation of surplus infrastructure capacity not utilized by a project; and
- Creation of capacity by an agency not required by a project.

Typical examples of growth-inducement are the removal of obstacles to population growth, such as the expansion of a major wastewater treatment plant that would allow more development in a service area, or construction of new roads and highways that would provide access to areas that were previously inaccessible. In addition, some projects may encourage and facilitate other activities that could significantly affect the environment, such as creating the demand for goods and services not previously available in an area. Relative to the Project, each of these general categories is described below under subheadings.

2. Direct Growth Associated with the Project

The proposed land uses, related facilities and the respective populations that directly utilize them represent an increment of direct on-site growth. Such growth would add approximately 2,060 residential units under the Project with County Office Building Option, up to 275 hotel rooms, 449,000 square feet of retail floor area, and a 681,000-square foot County office building. The Project with County Office Building Option would generate/support a population increase of approximately 2,925 persons and employment for 3,930 persons. The Project with Additional Residential Development Option, which would add up to 600 residential units in place of the County office building, would generate a population increase of 3,777 persons and employment for 1,206 persons. Under either the Project with County Office Building Option or the Project with Additional Residential Development Option, the estimated population and employment growth would be within SCAG's forecasted growth of 205,413 residents and 262,181 jobs for the City of Los Angeles Subregion between 2005 and 2015. Thus, the Project with County Office Building Option would represent 1.4 percent (1.8 percent under the Additional Residences Option) of the population growth and 1.4 percent of the

employment growth (0.5 under the Project with Additional Residential Development Option) within the City of Los Angeles Subregion. The development of the Project would serve projected growth in the Los Angeles area and concentrate growth within a jobs-rich, existing urban center.

The increment of direct growth described above has been the subject of each of the analyses of Project impacts upon the various environmental categories presented in Section IV, Environmental Impact Analysis, of this Draft EIR. The impacts of Project implementation would include effects on or from land use; traffic and circulation; parking; visual resources; historical resources; population, housing, and employment; air quality; noise; hazards and hazardous materials; public services, including fire, police, schools, parks and recreation and libraries; and utilities, including water supply, wastewater, and solid waste. Further, the analyses presented in Section IV identify other related project growth that is already occurring within the Project vicinity due to on-going growth in the area and accounted for the cumulative effects of these projects on the environment in conjunction with the proposed Project.

Therefore, the impacts of direct growth on the physical environment is fully accounted and analyzed in Section IV of this Draft EIR; and the direct growth attributable to this Project would not be classified as induced growth beyond expected levels in the region or the subregion.

3. Creation of Demand Not Satisfied Within the Project

The Project's resident and employee populations may produce a demand for goods, services or facilities not directly provided or satisfied within the proposed Project. For example, the Project's residents and employees would generate new demand for goods and services such as specialty retail, grocery, entertainment, banking, medical, and other commercial services, which would be only partially provided within the Project. Demand for goods and services not satisfied by the Project would increase demand for existing commercial uses in the area, for which demand is currently low during the evening and weekends. The Project would also increase critical mass and stimulate the growth of additional goods and services in the City core, which is a goal of the Central City Community Plan. A portion of the demand for housing in the City would be accommodated by the Project's residential component.

The Project site is surrounded by the Los Angeles business and financial core and a broad urban area, which currently provides a range of goods and services. The City core also provides an employment base that would support the Project's residential population. The Project's residential component would be located within close proximity to existing employment opportunities, and the Project is consistent with SCAG's subregional projections. The need for new housing in the region has been documented in the SCAG and City regional housing needs assessments. It may also be noted that the SCAG projections for the City of Los Angeles

Subregion indicate that employment opportunities between 2005 and 2015 are growing at a much faster rate than housing opportunities. For example, the ratio of jobs to residents in the City of Los Angeles Subregion in 2015 is expected to be 1.28 (i.e., 1.28 jobs for every housing unit). The ratio of jobs to household is currently at 2.01. Therefore, the demand for housing will increase notably in the future. Since the Project would ease a future demand, the mix of uses for the Project with County Office Building Option or Project with Additional Residences Option would not be considered growth inducing.

The Project would also cause an increase in the demand for public services that could indirectly induce off-site growth in service facilities, if the existing supply of such public services in the area were not adequate to provide for the Project's residents and employees. Service agencies in the area are already providing, subject to mandates and funding, improvements in services to meet the needs of on-going, anticipated growth. These improvements can often require the provision of new physical facilities whose development can have impacts on the physical environment. The Project's large scale and unique operating characteristics would cause the Project to be a contributor to the growing demand for public services.

Section IV.I of this Draft EIR analyzes the Project's impacts on public services. The analysis identifies potentially significant impacts of the Project on police protection, fire protection, parks, schools and library services. Each of the analyses identifies mitigation measures to reduce impacts to levels that would be less than significant. The mitigation measures are intended to offset Project impacts. Mitigation measures require a variety of on-site improvements and, in some cases, payment of mandatory or voluntary monies that would be used to enhance services. At the discretion of the service agencies, these funds may be used to provide new facilities whose construction would have impacts on the physical environment. For example, the Project's demand and payment of fees may contribute to the development of new parks or schools. Construction of off-site facilities may generate significant noise and air quality impacts at any adjacent sensitive uses. To the extent that new physical facilities are developed to meet the Project's demand for public services, the development of facilities would likely be sized to meet demands greater than just that of the Project. For example, some service facilities, e.g. schools or parks, are built to meet area-wide needs, rather than that needed by a single, individual project. To the extent facilities exceed the needs of the Project, the excess capacity in many cases may be needed to meet existing short-falls in service levels, and in some cases may be used to support further growth in the area. In such cases, the excess demand would be considered growth inducing. However, such incentive to growth would be short-term as the small increments of additional capacity would be quickly consumed by otherwise anticipated development. Further, such excess capacity could factor into people's decision to locate in an area, but would not be considered sufficient to notably alter regional growth patterns.

4. Creation of Surplus Infrastructure Capacity not Utilized by the Project

The area surrounding the Project site is currently developed with water, wastewater, power, natural gas, telephone, and transportation infrastructure. As discussed in Section IV. J, Utilities, the Project's demand for water, sewer and solid waste services would be met through existing facilities and/or improvements, except for upgrades to the water lines along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L.. At the time site plans for the Project are submitted to the utility providers, additional facilities may be required, e.g. upgraded off-site sewer lines. The provision of enhanced utilities in an efficient manner may require sizing of improvements to meet the needs beyond any single project. However, such excess capacity would add small incremental improvements to an existing system, which would accommodate a small amount of additional growth that is otherwise on-going, and anticipated. In addition, any of the Project's infrastructure improvements would not open new areas for development and would only support small increments of near-term growth in the existing urban area.

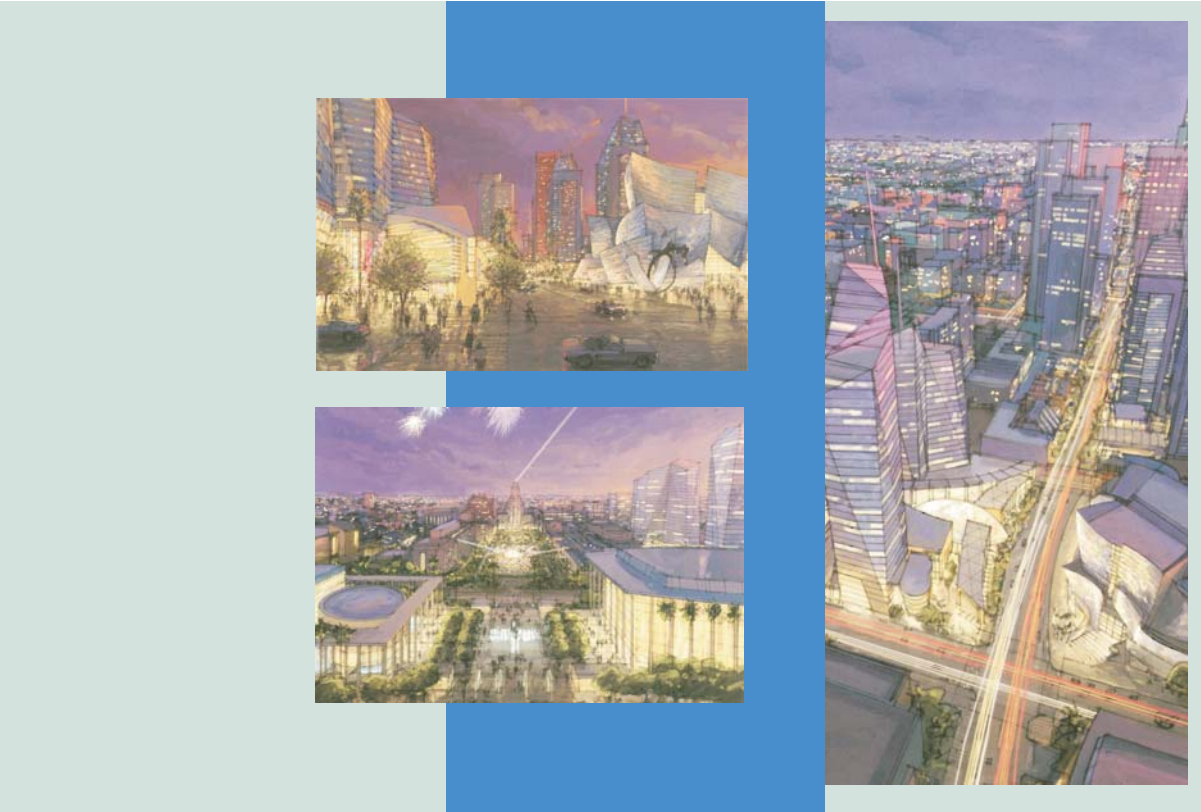
5. Creation of Capacity by an Agency Not Required by the Project

In considering the infrastructure needs of the Project, public agencies could increase infrastructure capacity under their jurisdictions beyond that required by the Project in order to achieve economies of scale. Such agencies may look longer term, and beyond the services required by this Project, or needs otherwise described above. According to the discretion of the public agencies, new facilities, which would be sized larger than the requirements of the Project, may be intended to provide more efficient service to existing users, in which case, such construction would not be considered growth-inducing. It is not anticipated that the public service agencies would seek to create additional capacity, beyond that required for currently anticipated growth.

6. Conclusions Regarding Growth Inducing Impacts

The proposed Project represents new developments within the most highly urbanized portion of Southern California. While the Project would consist of a mix of uses that would be attractive for potential future residents as well as retail, restaurant and entertainment uses, the Project would also capture a portion of the existing demand for such uses in the area. Some additional capacity in existing service and utility systems beyond that required by the Project may be created. Such additional capacity would be considered growth inducing. However, such capacity would be short-term, would add only small incremental enhancements to existing systems, and would not create a new capacity that would open new areas for development. Therefore, these impacts would not be substantial in nature and thus, are concluded to be less than significant.

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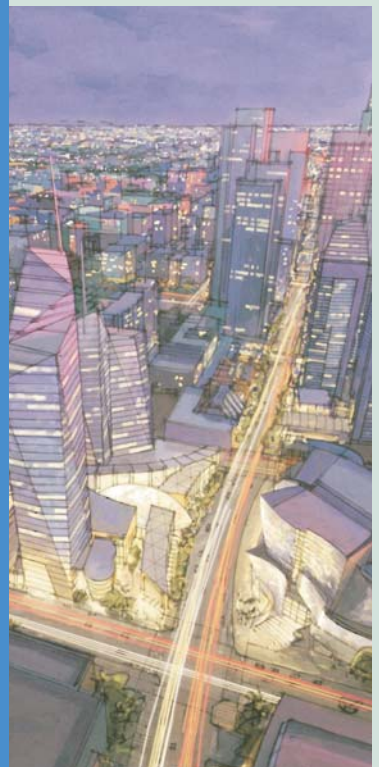
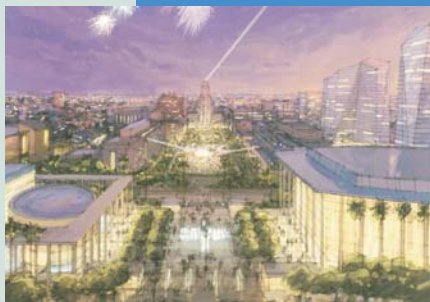
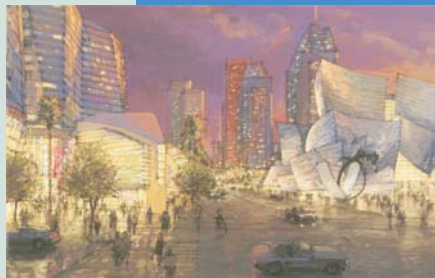
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Bunker Hill Amended Design for Development, 1971.

Bunker Hill Amended Design for Development, August 2005.

Bunker Hill Redevelopment Plan, 1970.

California Air Resources Board, 2006.

California Air Resources Board, Air Quality and Land Use Handbook, April 2005.

California Air Resources Board, Ambient Air Quality Standards, 2006.

California Air Resources Board, Ambient Monitoring Data 2000–2005.

California Air Resources Board: <http://www.arb.ca.gov/toxics/cti/hlthrisk/cncrinhl/riskmapviewfull.htm>.

California Building Code.

California Clean Air Act, 1988.

California Government Code Section 66477, Quimby Act.

California Hazardous Waste Control Law.

California Integrated Waste Management Act of 1989.

California Integrated Waste Management Board.

California Register of Historical Resources.

California Solid Waste Reuse and Recycling Access Act of 1991.

CARTIFACT, 2006.

Census 2000, Table P31. Travel Time to Work for Workers 16 Years and Over, Census Tract 2075.

Central City Community Plan, January 8, 2003.

City of Los Angeles' 2000 Census Profile.

City of Los Angeles, 2004 Los Angeles Police Department Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 report.

City of Los Angeles, Air Quality Element, City of Los Angeles General Plan, adopted November 1992.

City of Los Angeles, Anne Connor, Central Library Director, LAPL, November 22, 2005.

City of Los Angeles, Board of Cultural Affairs Commissioners Control over Works of Art.

City of Los Angeles Bureau of Engineering.

City of Los Angeles CEQA Thresholds Guide (1998).

City of Los Angeles, Citywide General Plan Framework, August 2001.

City of Los Angeles Civic Center Shared Facilities and Enhancement Plan, 1997.

City of Los Angeles Cultural Heritage Commission Policy Guide.

City of Los Angeles, Cultural Heritage Ordinance, adopted 1962; amended 1985.

City of Los Angeles Cultural Heritage Ordinance, Los Angeles Administration Code, Section 22.130.

City of Los Angeles, Department of Recreation and Parks, Center Locator, website, <http://gis.lacity.org/recandpark/recandpark.htm#>, accessed January 27, 2006.

City of Los Angeles, Department of Recreation and Parks, website: www.laparks.org/dept.htm, accessed January 27, 2006.

City of Los Angeles, Department of Transportation, Traffic Study Methodology Memorandum of Understanding, Mobility Group Traffic Study, Appendix D.

City of Los Angeles, Department of Water and Power, Urban Water Management Plan, Fiscal Year 2003-2004 Annual Update, 2004.

City of Los Angeles, Department of Water and Power, Urban Water Management Plan, 2005.

City of Los Angeles, Department of Water and Power, <http://ladwp.com>.

City of Los Angeles, Department of Water and Power, Water Supply Assessment, April 13, 2006.

City of Los Angeles, Downtown Cordon Count, May 2002.

City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998.

City of Los Angeles Fire Department, Douglas Barry, Assistant Fire Marshal, Fire Department Bureau of Fire Prevention and Public Safety, December 19, 2005.

City of Los Angeles Fire Department, Fax from Captain II - Paramedic William Wells, Los Angeles Fire Department Planning Section, January 10, 2006.

City of Los Angeles Fire Department, Fire Department website: <http://www.lafd.org/about.htm>, accessed January 5, 2006.

City of Los Angeles Fire Department, Fire Protection and Prevention Plan, a part of the General Plan of the City of Los Angeles, adopted January 1979.

City of Los Angeles Fire Department, Planning Section and Bureau of Fire Prevention and Safety.

City of Los Angeles General Plan.

City of Los Angeles General Plan Framework.

City of Los Angeles General Plan Framework, Long Range Land Use Diagram.

City of Los Angeles Historic Preservation Element.

City of Los Angeles, Historic Preservation Overlay Zone (HPOZ) Ordinance, adopted 1979; revised 1997.

City of Los Angeles, Housing Element, City of Los Angeles General Plan. Adopted December 18, 2001.

City of Los Angeles, letter from Officer Tanya Hanamaikai, Community Relations Section, Crime Prevention Unit, November 29, 2005.

City of Los Angeles, Michael A. Shull, Superintendent with the City of Los Angeles, Department of Recreation and Park, letter dated January 23, 2006.

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.10.C.1.

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.11.C.2

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.11.C.3

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.12.

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.14.

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.14.C.2

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.21.1.

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.22.A.18(C)(3).

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.22A(25)

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.22A(26).

City of Los Angeles Municipal Code, Planning and Zoning Code Section 12.22AXVIII(a).

City of Los Angeles Municipal Code, Section 17.12.

City of Los Angeles Municipal Code, Section 57.118.12.

City of Los Angeles Municipal Code, Section 111.03

City of Los Angeles Noise Ordinances.

City of Los Angeles, NOP response letter from Juliana Cheng, Los Angeles Public Library, October 2005.

City of Los Angeles Ordinances Nos. 163532, 164093, 166060, 170978, and 171036, 171139, 171687.

City of Los Angeles Planning Department, Transportation Element of the General Plan, Chapter II.

City of Los Angeles Police Department, Central Area, Information Technology Division and Crime Prevention Unit.

City of Los Angeles Public Library, 1998 Library Bond Program Quarterly Report, Los Angeles Public Library Bureau of Engineering, Bond Update (October 2005).

City of Los Angeles Public Library Branch Facilities Plan, adopted 1988, revised 1998.

City of Los Angeles Public Library, the Library Foundation of Los Angeles Annual Report 2004-2005.

City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.

City of Los Angeles Sewer Allocation Ordinance.

City of Los Angeles, Solid Waste Management Policy Plan.

City of Los Angeles, Source Reduction and Recycling Element.

City of Los Angeles, Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004.

City of Los Angeles, telephone conversation with Detective Smith of the Los Angeles Police Department Central Area Detective Unit, December 12, 2005.

City of Los Angeles, telephone conversation with Officer Perkins, Crime Prevention Unit, December 12, 2005.

City of Los Angeles Website.

City of Los Angeles website for the Project Restore program for the City Hall building:
<http://www.lacity.org/restore/rstpr1.htm>.

“Clara Shortridge Foltz Criminal Justice Center.” An article from the Los Angeles Public Library California Index, n.d.

Code of Federal Regulations (CFR), 36 Section 60.2.

Community Redevelopment Agency (CRA/LA).

County of Los Angeles, 2004 Congestion Management Program for Los Angeles County, Los Angeles County Metropolitan Transportation Authority, Exhibit B-6 (July 2004).

County of Los Angeles, Arts Commission.

County of Los Angeles Civic Art Policy and Procedures, December 7, 2004.

County of Los Angeles, Department of Public Works, 2003 Annual Report Presentation, page 11.

County of Los Angeles General Plan.

County of Los Angeles, Historical Landmarks and Records Commission.

County of Los Angeles Solid Waste Management Action Plan.

David Taussig and Associates, Inc., Residential Development Market Report for Los Angeles School District.

Downtown Strategic Plan, 1994.

Draft City of Los Angeles Citywide CEQA Technical Guide, August 1998.

Eagle Aerial, May 2001.

Farsai, Ferrain, December 7, 2005.

Federal Clean Air Act.

Federal Resource Conservation and Recovery Act.

Federal Transit Administration, 1995.

Fire Code of the Los Angeles Municipal Code, Section 57.09.06.

FPL & Associates, 2006.

FTA, Transit Noise and Vibration Impacts Assessment, April 1995.

Grand Avenue Implementation Project Historic Resources Technical Report.

Grand Avenue Project EIR Traffic Study, The Mobility Group, April 28, 2006.

Grand Avenue The Related Companies, 2005.

Grimes, Theresa and Brenda Levin and Associates. "Historic Analysis - Kenneth Hahn Hall of Administration: Strategic Estate and Facilities Options." Los Angeles County Chief Administrative Office, December 2005.

Guidelines for the Preparation and Content of the Noise Element of the General Plan, California Department of Health Services, in coordination with the Office of Planning and Research.

Herald Examiner Collection.

Herman, Robert. "Downtown Los Angeles: A Walking Guide." City Vista Press, Claremont, California, 1997.

Hines, Thomas. "Richard Neutra and the Search for Modern Architecture." Oxford University Press.

Historic Resources Technical Report, May 1, 2006.

Hodges and Shutt, December 1993.

Institute of Transportation Engineers, Parking Generation 3rd Edition, Washington, D.C., 2004.

Institute of Transportation Engineers, Trip Generation Manual, 6th Edition 1997.

Iris Environmental, Phase I Environmental Site Assessment for Parcels L, M-2, Q, and W-2, April 2005.

Iris Environmental, Phase I Environmental Site Assessment Parcel W-1, November 2005.

Iris Environmental, telephone conversation with Genevieve Proctor, March 30, 2006.

LA CEQA Thresholds Guide, 1998.

Larson-Davis 820 Type 1 Integrating Sound Level Meter. Measurement LAMC, Section 111.03.

Lee Nelson, Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character, Preservation Brief 17, U.S. Department of the Interior, Preservation Assistance Division, 1982, page 1.

Los Angeles County Code Section 12.08.350.

Los Angeles Downtown Center Business Improvement District, Live, Work & Play Downtown L.A., 2005.

Los Angeles Times. "New Plans Offered for Civic Center." August 14, 1951, pg. A1.

Los Angeles Unified School District Information Branch, Planning, Assessment and Research Division, School Profiles, website: www.lausd.k12.ca.us/lausd/offices/icb/, accessed April 25, 2006.

Los Angeles Unified School District, OEHS, letter in response to NOP from Glenn Striegler, October 10, 2005.

Los Angeles Unified School District, Office of Communications, Fingertip Facts 2004-2005.

National Historic Preservation Act of 1966.

National Register Bulletin: How to Apply the National Register Criteria for Evaluation, U.S. Department of Interior, National Park Service, 1997.

National Register Criteria Consideration G: Properties That Have Achieved Significance Within The Last Fifty Years.

National Register of Historic Places (National Register).

NCHRP Report 323, Travel Characteristics at Large-Scale Suburban Activity Centers, Washington, D.C., 1989.

Notice of Preparation (NOP) for the Amended Design for Development to the Bunker Hill Redevelopment Plan, February 28, 2005.

Occupational Safety and Health Act, 1970.

Owner Participation Agreement for Parcels K, Q, and W2, 1991.

PCR Services Corporation, Disneyland Resort Proposed West Parking Structure Vibration Analysis, 1997.

Proposed Amended Design for Development for the Bunker Hill Redevelopment Plan.

Psomas, Inc., Water and Sewer Infrastructure Report, May 4, 2006.

Research Division, 2005.

Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, U.S. Department of the Interior, National Park Service, Preservation Assistance Division, 1990.

South Coast Air Quality Management District, Air Quality Management Plan, amended 2003.

South Coast Air Quality Management District 2004 RTP projections.

South Coast Air Quality Management District, AQMD Website: www.aqmd.gov/news1/aqmp_adopt.htm, Accessed January 5, 2006.

South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005.

South Coast Air Quality Management District, Risk Assessment Procedures for Rules 1401 and 212, November 1998.

South Coast Air Quality Management District Rule 403 requirements.

South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

Southern California Association of Governments, Compass Vision Report.

Southern California Association of Governments, Regional Comprehensive Plan and Guide, March 1996.

Southern California Association of Governments, Regional Socio-Economic and Travel Demands Forecasts, 2003.

Southern California Association of Governments, Regional Transportation Plan, 2004.

State CEQA Guidelines, 14 California Code of Regulations.

State of California Air Resources Board.

State of California Code of Regulations, Title 14, Chapter 11.5, Section 4852.

State of California Department of Transportation, "2004 California State Highway Traffic Volumes."

State of California Public Resources Code § 5024.1(a).

State of California Public Resources Code § 21084.1.

State of California, Health and Safety Code Section 17921.3.

State of California, Office of Historic Preservation.

State of California, Office of Public School Construction, School Facility Program Handbook, February 2005.

State of California, Senate Bill 50.

State of California, Senate Bill 221 (Kuehl).

State of California, Senate Bill 610 (Costa).

State of California, Title 20, CAC, Section 1604(f).

State of California, Title 20, CAC, Section 1606(b).

State of California, Title 24, CAC, Section 2-5307(b).

State of California, Title 24, CAC, Section 2-5352(i) and (j).

Tamini, Belel, Bureau of Sanitation/Wastewater Engineering Service Division, January 24, 2006.

The Related Companies, 2005.

The Related Companies, L.P., 2006.

United States Environmental Planning Association, Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.

United States Environmental Protection Agency, Bolt, Beranek, and Newman, Noise Control for Buildings and Manufacturing Plants, 1987.

United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

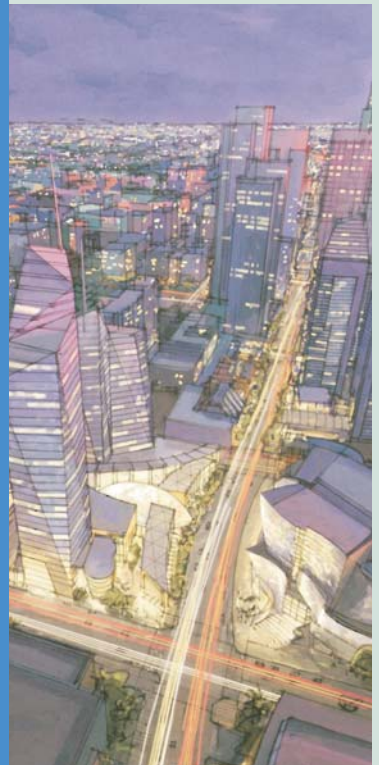
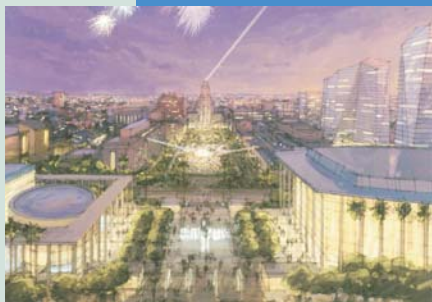
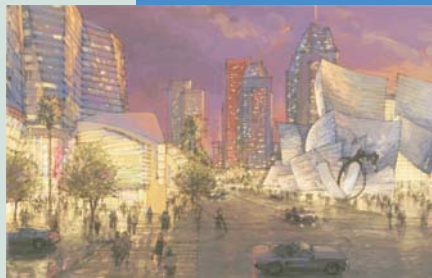
United States Environmental Protection Agency (USEPA).

Urban Land Institute, Shared Parking, Washington, D.C., 1983.

U.S. Department of Transportation, Federal Transit Administration, 1995.

USGS (2005) – Google Earth Pro.

APPENDIX A: Notice of Preperation (NOP),
Initial Study, Scoping Meeting Transcript
and NOP Response Letters





APPENDIX A-1

NOTICE OF PREPARATION (NOP)

CALIFORNIA ENVIRONMENTAL QUALITY ACT

SEP 06 2005

NOTICE OF PREPARATION AND SCOPING MEETING

LOS ANGELES, COUNTY CLERK

TO: All Interested Agencies, Parties, Organizations, and Persons

FROM: The Los Angeles Grand Avenue Authority, c/o California Community Foundation, 445 South Figueroa Street, Suite 3400, Los Angeles, CA 90071

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting

PROJECT TITLE: The Grand Avenue Project

PROJECT PROPONENT:

The Los Angeles Grand Avenue Authority (Authority) will be the Lead Agency and has selected a consultant to assist in the preparation of an environmental impact report (EIR) for the proposed Project (Grand Avenue Project) identified above. We need to know the views of your agency as to the scope and content of the environmental information, which is germane to your agency's statutory responsibilities in connection with the proposed Project. If you are responding for a responsible agency, your agency will need to use the EIR prepared by the Authority when considering your permit or other approval. If you are responding as a private person or organization, this scoping notice allows you an early opportunity to consult on the Project.

The location, project description and potential environmental effects of the Grand Avenue Project are contained in the attached materials.

A copy of the Initial Study is attached.

A copy of the Initial Study is not attached.

An information open house and scoping meeting will be held to receive public testimony regarding the appropriate scope and content of the environmental information to be included in the Draft Environmental Impact Report. The open house and public scoping meeting for this project will be held on Tuesday, September 20, 2005 from 6:00 P.M. to 8:00 P.M. at the following location:

Cathedral of Our Lady of the Angels
Center at Cathedral Plaza, Meeting Room 6, First Floor
555 West Temple Street
Los Angeles, CA 90012

Your participation in the public scoping meeting is welcome and voluntary. Due to the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice to be certain of consideration in the Draft EIR. Responses to this scoping notice are due by October 10, 2005. There will be response forms available at the public scoping meeting to provide one alternative means of responding to this scoping notice.

THE LOS ANGELES GRAND AVENUE AUTHORITY

Please send your written response to Martha Welborne at the address of the Agency as shown above or by email to EIRcomment@grandavenuecommittee.org. Please provide the name of a contact person in your agency.

DATE: 8/31/05

Martha Welborne
Ms. Martha Welborne

Attachments

**ATTACHMENT TO THE NOTICE OF PREPARATION
For the proposed
GRAND AVENUE PROJECT**

GENERAL INFORMATION

Purpose of Notice of Preparation

The purpose of the Notice of Preparation (NOP) is to inform Responsible and Trustee Agencies (i.e., public agencies other than the lead agency that have discretionary approval power over the proposed project) that an Environmental Impact Report (EIR) will be prepared and to solicit their concerns regarding the potential environmental effects of the proposed project. This notice is legally required.

The California Environmental Quality Act (CEQA) requires environmental documentation of any proposed project that may result in a significant impact to the environment. Therefore, it is the Authority's intent to prepare an EIR for the Grand Avenue Project. The EIR will address potential project and cumulative impacts as well as alternatives related to the development of the Grand Avenue Project.

CEQA also encourages early consultation with private persons and organizations that may be concerned with the potential environmental effects of the Project. This Notice of Preparation serves this additional purpose.

The CEQA Guidelines state that, for response to this NOP to be considered in the preparation of the Draft EIR, such responses must address environmental issues related to this specific project.

All written responses to this NOP will be included as an Appendix in the Draft EIR and their contents considered in accordance with State environmental guidelines. Those who respond to the NOP (Respondents) do not receive individual responses. Instead, each Respondent to the NOP will receive a notice of availability of a copy of the Draft EIR when it is distributed for public review and comment.

Initial Study

An "Initial Study" is a preliminary analysis prepared by the Lead Agency to determine whether an EIR must be prepared or to identify the potential significant environmental effects to be analyzed in the EIR. If preliminary review indicates that an EIR must be prepared, the environmental review process can begin without the preparation of an Initial Study. Authority staff's review of the scope of the proposed Project concluded that an EIR is the appropriate level of environmental review for this project; therefore, an Initial Study is not a part of this notice.

Project Location and Boundaries

The Project Site is located in downtown Los Angeles. The Project site consists of the Grand Avenue right-of-way, between 5th Street and Cesar Chavez Avenue; the Los Angeles Civic Mall, between Spring Street and Grand Avenue, and five non-contiguous parcels located in the Bunker Hill Urban Renewal Project Area. The location of the Project site and an identification of the Project's several components are shown in Figures 1 and 2, respectively

PROJECT BACKGROUND AND DESCRIPTION

The Proposed Project includes the creation of a revitalized Civic Park within the 16-acre Los Angeles County Civic Mall; streetscape improvements along Grand Avenue between Fifth Street and Cesar Chavez Avenue to attract and accommodate more pedestrian traffic; and development of five parcels, four of which are located within the Grand Avenue Implementation Plan, with the fifth parcel to be separately acquired by the Related Companies. The five parcels are hereafter referred to as parcels Q, W-1, W-2, L and M-2. Parcels Q and W-2 are currently owned by the County of Los Angeles (County), parcels L and M-2 are currently owned by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA), and parcel W-1 is owned by a third party. To facilitate development of these parcels, the County and the CRA/LA formed a joint powers authority known as the Los Angeles Grand Avenue Authority (Authority) pursuant to a Joint Exercise of Power Agreement. That agreement designates the Authority as the Lead Agency for purposes of review under the California Environmental Quality Act (CEQA) since, among other reasons, the Authority is responsible for obtaining ground leases from the County and CRA/LA for the four parcels and assigning those leases to the Related Companies for development of the parcels. (The County and CRA/LA will act as Responsible Agencies under CEQA.) Accordingly, the Grand Avenue Project is proposed for implementation by the Authority. The Authority has contracted with the Grand Avenue Committee to provide certain real property negotiating and other related services. The Project's developer, Related Companies, L.P., was selected through a competitive process. The Grand Avenue Implementation Plan, which guides the development of the Project, represents a collaborative effort among the Grand Avenue Authority, the Grand Avenue Committee and the Related Companies.

Projected land uses on the five parcels consist of a combination of residential, retail, office, and hotel uses. Total development proposed for the five parcels consists of up to 2,060 residential units, 20 percent of which (up to 412 units) would be provided as affordable housing; approximately 225 hotel rooms; up to 479,500 square feet of retail space; up to 600,000 square feet of commercial office space; and up to 5,500 parking spaces. All proposed parking would be provided in podium and subterranean parking structures. An overview of the Project's proposed land uses for each parcel is presented in Table 1.

Table 1 PROPOSED PROJECT LAND USE SUMMARY					
Project Component/Site	Scope of Development				
Civic Park Improvements:	16 acres				
Grand Avenue Streetscape:	Fifth Street to Cesar Chavez Avenue				
	Residential ^a				
	Total Units	Affordable Units	Retail (sq. ft.)	Hotel (Rooms)	Office (sq. ft.)
Parcels					
Parcel Q	500	100	292,000	225	0
Parcels W-1/W-2	710	142	62,500	0	600,000
Parcels L/M-2	850	170	125,000	0	0
Total (All Parcels)	2,060	412	479,500	225	600,000
<p>^a Affordable units are not in addition to, but are included in the total units. Total affordable units will represent 20 percent of the maximum number of units in the approved development plans.</p> <p>Source: The Related Companies, August 2005.</p>					

In order to fully respond to the future needs and demands of the southern California economy, the proposed Project includes an Equivalency Program that would allow the composition of on-site development to be modified to respond to future needs in a manner that does not increase the Project's impacts on the environment. The Equivalency Program would provide flexibility for modifications to land uses and square footages within the five parcels. Within this framework, land uses can be exchanged for certain other permitted land uses so long as the limitations of the Equivalency Program are satisfied and no additional environmental impacts occur. All permitted Project land use increases can be exchanged for corresponding decreases of other land uses under the proposed Equivalency Program.

POSSIBLE ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

It is expected, based on a staff review, that the environmental consequences of the Project may include effects within the following environmental categories, either by themselves or cumulatively with existing and proposed development in the area, taking into account all phases of project planning, implementation, and operation and therefore, these potential impacts will be analyzed in an EIR:

- Aesthetics & Visual Resources;
- Air Quality;
- Cultural Resources;
- Hazardous Materials;
- Land Use & Planning;
- Noise;
- Population and Housing;
- Public Services (fire, police, schools, parks, recreation and libraries);
- Traffic, Circulation and Parking; and
- Utilities (sewers, sewage treatment, solid waste generation, water supply).

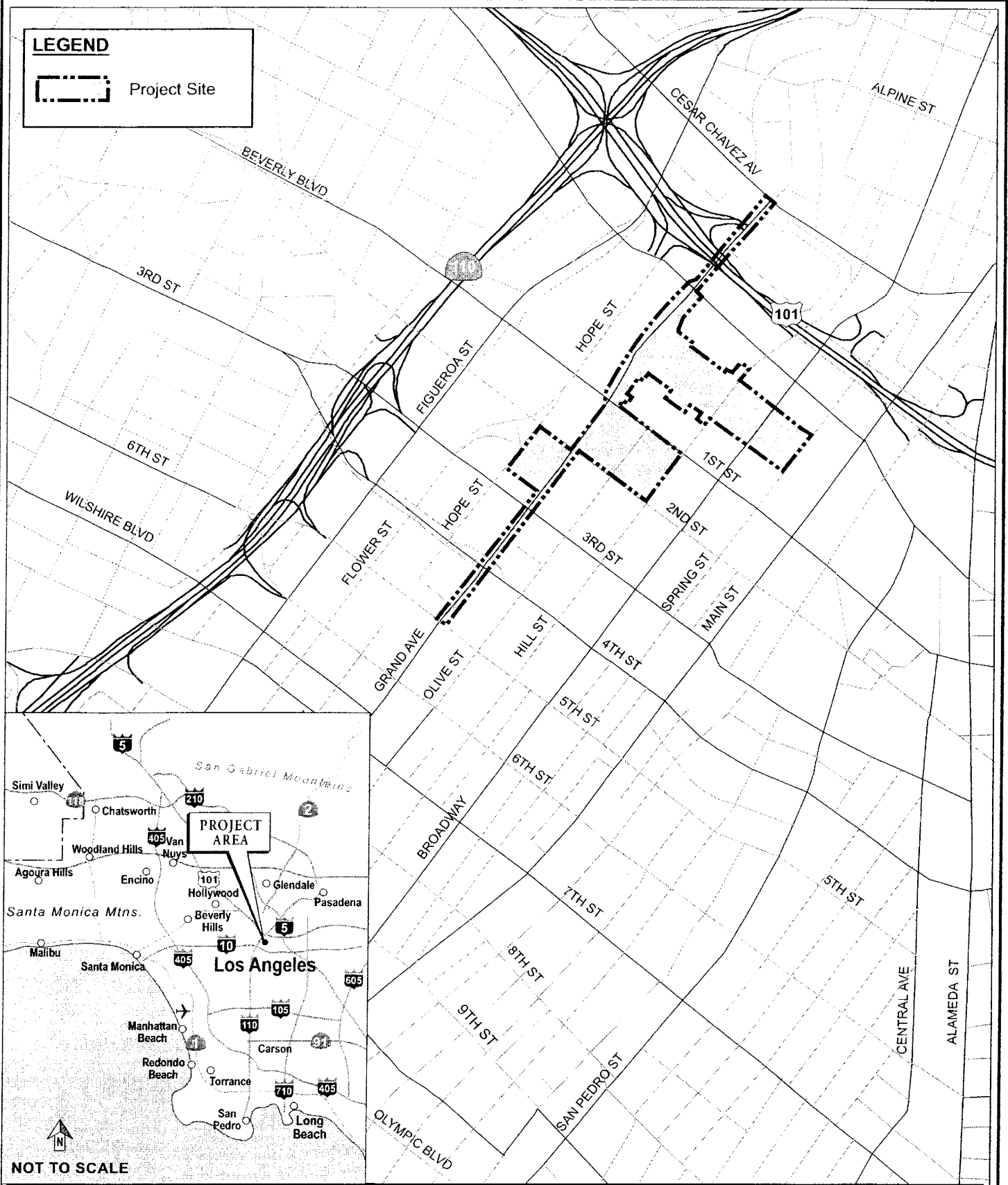
ENVIRONMENTAL EFFECTS DETERMINED NOT TO BE SIGNIFICANT

In the course of the preliminary review, it has been determined that the following environmental categories are not potentially raised by the proposed Project, and therefore these categories will not be analyzed in the EIR:

- Agricultural Resources;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality; and
- Mineral Resources.

LEGEND

 Project Site



Scale in approximate miles
Source: PCR Services Corporation, 2005

Figure 1
Regional Vicinity Map

LEGEND

Project Components



Scale in approximate miles

Source: Eagle Aerial, May, 2001.

Figure 2
Proposed Project Site



APPENDIX A-2

INITIAL STUDY

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**THE LOS ANGELES GRAND AVENUE AUTHORITY
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST**

Date: August 1, 2005; rev. 8/18/05; rev. 10/7/05

Project Title: Grand Avenue Project

Project Location: City of Los Angeles

Project Description: The Grand Avenue Project (the "Project") consists of the following three components: (1) the creation of Civic Park within the 16-acre Civic Mall that connects Los Angeles' City Hall to Grand Avenue; (2) streetscape improvements along Grand Avenue between 5th Street and Cesar Chavez Avenue to attract and accommodate more pedestrian traffic; and (3) development of five parcels, four of which are located within the Grand Avenue Implementation Plan (the "Implementation Plan"), with the fifth parcel to be separately acquired by The Related Companies, L.P. (the "Applicant"). The five parcels are referred to as Parcels Q, W-1, W-2, L and M-2. Parcels Q and W-2 are currently owned by the County of Los Angeles, Parcels L and M-2 are owned by the Community Redevelopment Agency of the City of Los Angeles, and Parcel W-1 is owned by a third party. Projected land uses on the five parcels consist of a combination of residential, retail, office, and hotel uses. Proposed development on the five parcels consists of up to 2,060 residential units, 20 percent of which (up to 412 units) would be provided as affordable housing; approximately 225 hotel rooms; up to 479,500 square feet of retail space; up to 600,000 square feet of office space; and a total of up to 5,500 parking spaces. The Applicant is proposing a wide range of land uses in order to create a diversity of on-site activity that responds to the future needs and demands of the southern California economy. In order to fully respond to these demands, the proposed Project includes an Equivalency Program that would allow the composition of on-site development to be modified to respond to these future needs in a manner that does not increase the Project's impacts on the environment. Please refer to Attachment A for additional detailed information regarding the Project.

Previous Completed Environmental Documents: Final EIR for the Bunker Hill Urban Renewal Project, certified December 1971, as revised by the final supplement prepared for California Center (now California Plaza) and certified September 1981; Final EIR for Parcels K, Q and W-2, Bunker Hill Urban Renewal Project, certified 1991, and Addendum No. 1 to the Final EIR, adopted in 1996; Addendum No. 2 to the Final EIR, adopted in 1999.

DETERMINATION

On the basis of the attached initial study checklist and evaluation:

- I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in Attachment Three have been added to the project. A MITIGATED NEGATIVE DECLARATION WILL BE PREPARED.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that THERE IS ADDITIONAL INFORMATION for the proposed project with respect to environmental conditions, impacts, mitigation measures or alternatives identified in the prior environmental impact report. Only minor additions or changes will be necessary to make the previous EIR adequately apply to the project in the changed situation and a SUPPLEMENT TO THE EIR will be prepared.
- I find that none of the conditions requiring an additional environmental document have occurred.

Martha Welborne



ENVIRONMENTAL IMPACTS

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
-----------------------------------	---	---------------------------------	-----------

IV. BIOLOGICAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

V. CULTURAL RESOURCES: Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

VI. GEOLOGY AND SOILS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: | | | | |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. HYDROLOGY AND WATER QUALITY. Would the proposal result in:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood plain structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

IX. LAND USE AND PLANNING. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. MINERAL RESOURCES. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XI. NOISE. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XII. POPULATION AND HOUSING. Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XIII. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- | | | | | |
|---------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Fire protection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other governmental services (including roads)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XIV. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XV. TRANSPORTATION/CIRCULATION. Would the project:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Result in inadequate parking capacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVI. UTILITIES. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
effects?				
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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

PREPARED BY

TITLE

TELEPHONE #

DATE

ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

The Grand Avenue Project (“Project”) is proposed for implementation by The Los Angeles Grand Avenue Authority (“Authority”). The Authority was established through a Joint Exercise of Powers Agreement (the “Agreement”) between The Community Redevelopment Agency of the City of Los Angeles, California (“CRA/LA”) and the County of Los Angeles (“County”). The Authority has contracted with the Grand Avenue Committee (“GAC”) to provide certain real property negotiating and other related services. The Project’s developer, The Related Companies, L.P. (“Related Companies”), was selected through a competitive process. The Grand Avenue Implementation Plan (“Implementation Plan”), which guides the development of the Project, represents a collaborative effort among the Authority, GAC and Related Companies.

The Project consists of the following three components: (1) the creation of Civic Park within the 16-acre Civic Mall that connects Los Angeles’ City Hall to Grand Avenue; (2) streetscape improvements along Grand Avenue between Fifth Street and Cesar Chavez Avenue to attract and accommodate more pedestrian traffic; and (3) development of five parcels, four of which are located within the Grand Avenue Implementation Plan (“Implementation Plan”), with the fifth parcel to be separately acquired by Related Companies. The four parcels that are located within the Implementation Plan are referred to as Parcels Q, W-2, L, and M-2. The fifth parcel is referred to as Parcel W-1.

Parcels Q and W-2 are currently owned by the County, parcels L and M-2 are currently owned by the CRA/LA, and parcel W-1 is owned by a third party. To facilitate the development of these parcels, the County and the CRA/LA formed the Authority as a joint powers authority responsible for overseeing the implementation of the Project. Accordingly, the Agreement designates the Authority as the lead agency for purposes of review under the California Environmental Quality Act (CEQA) since, among other reasons, the Authority is responsible for obtaining ground leases from the County and CRA/LA for the four parcels and assigning those ground leases to Related Companies for development of those parcels. (The County and CRA/LA) will act as responsible agencies under CEQA.) The Related Companies, L.P. is the Project applicant (“Applicant”) for the five parcels proposed for development and is obligated to implement the Plan for the Civic Park.

Projected land uses on the five parcels consist of a combination of residential, retail, office, and hotel uses. Development on the five proposed development parcels consists of: up to 2,060 residential units, 20 percent of which (412 units) would be provided as affordable housing; approximately 225 hotel rooms; up to 479,500 square feet of retail space; and up to 600,000 square feet of commercial office space. In order to fully respond to the future needs and demands of the southern California economy, the proposed Project includes an Equivalency Program that would allow the composition of on-site development to be modified to respond to these future needs in a manner that does not increase the Project's impacts on the environment.

B. PROJECT LOCATION, BOUNDARIES AND SETTING

The Project Site is located in downtown Los Angeles, in an area generally bounded by the Harbor Freeway (I-110) on the west, Spring and Main Streets on the east, 5th Street on the south, and the Hollywood/Santa Ana Freeway (I-101) on the north. The downtown Los Angeles area is highly urbanized with many notable buildings associated with hotels, commerce, professional services and residential uses; federal, state, and municipal offices and courts; and cultural and entertainment uses. The City's financial district is located generally along Grand Avenue, Flower Street and Figueroa Street south of the Project site. A cluster of mid- to high-rise residential developments is located west of the Project site, generally between Hope Street and the Harbor Freeway.

The proposed Project site includes the Civic Mall between Los Angeles' City Hall and Grand Avenue; the streetscape along Grand Avenue between Fifth Street and Cesar Chavez Avenue; and five parcels located within the CRA/LA's Bunker Hill Urban Renewal Project Area. The location of the Project site is shown on the regional and vicinity map presented in Figure A-1 on page A-3. The following is an overview of existing conditions and uses surrounding the Project.

The Civic Mall is an east-west oriented public open space area located between Los Angeles' City Hall on the east and Grand Avenue on the west. This 16-acre area is divided by Hill Street and Broadway into three defined sections. The Civic Mall is located mid-block, bordered by public buildings to the north and south, which, themselves, front on Temple Street to the north and First Street to the south. Major governmental offices, businesses, and cultural and entertainment venues currently frame the Civic Mall and include the Dorothy Chandler Pavilion, Ahmanson Theater, Mark Taper Forum, and Walt Disney Concert Hall on the west; the Los Angeles County Courthouse and Law Library, and the Times-Mirror Building on the south; Los Angeles City Hall on the east; and the County Criminal Courts Building, Hall of Records, and Hall of Administration on the north. The Cathedral of Our Lady of the Angels is located across Temple Street to the north of the County Hall of Administration.

LEGEND



Project Site

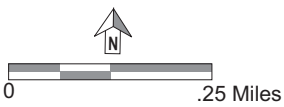
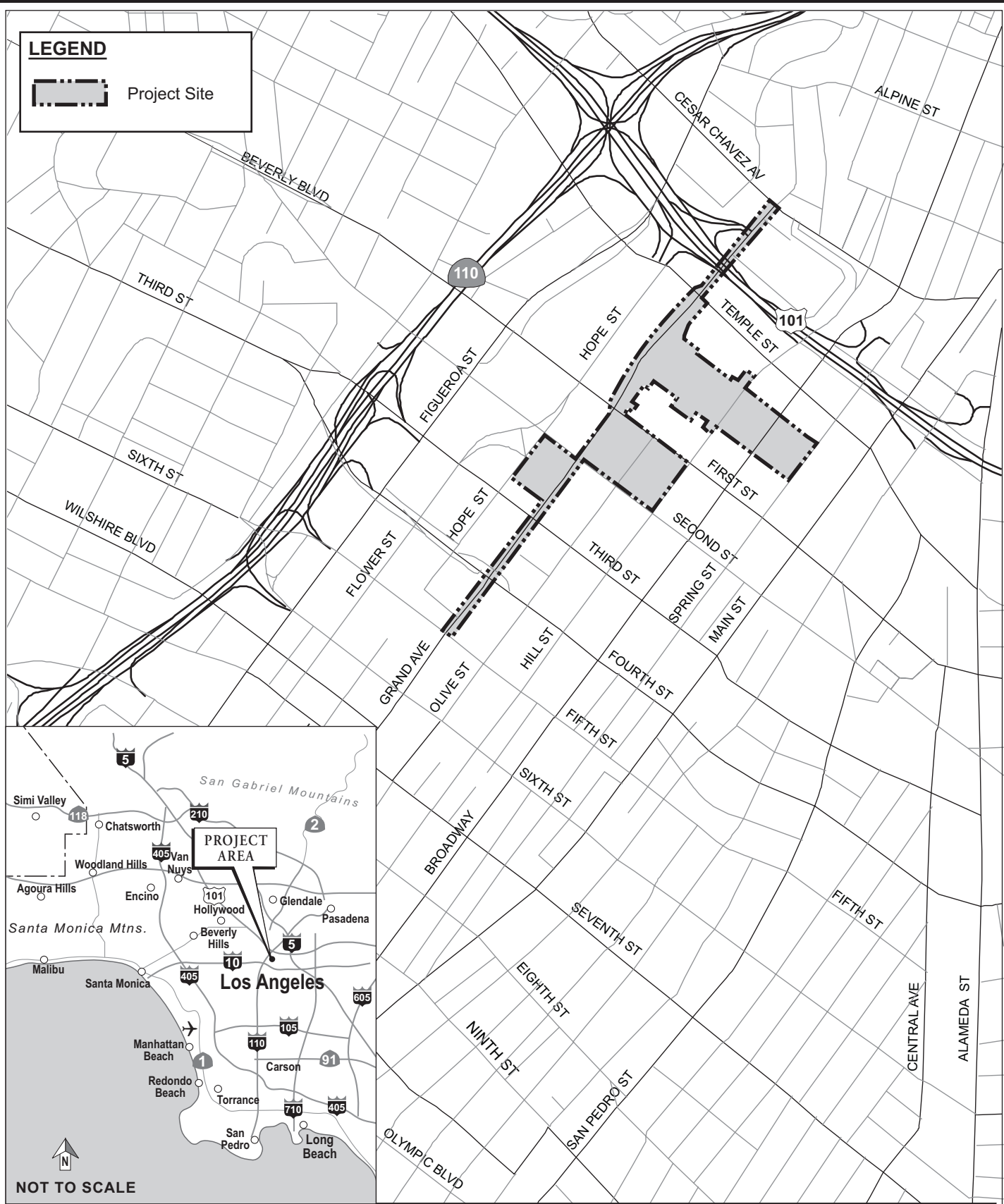



Figure A-1
Regional Vicinity Map

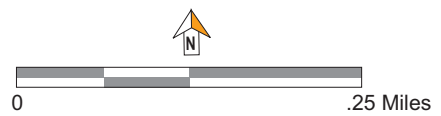
Source: PCR Services Corporation, 2006

Grand Avenue is a north-south street located in Downtown Los Angeles between, and running parallel to, Hope and Olive Streets. It borders the east sides of the Walt Disney Concert Hall and the Los Angeles Music Center. Other notable structures and features along Grand Avenue include the Library Tower, California Plaza, the Wells Fargo Center, the Los Angeles Museum of Contemporary Art (MOCA), and the Colburn School of Performing Arts.

The five proposed development sites, known as Parcels Q, L, M-2, W-1 and W-2, are all located within the Bunker Hill Urban Renewal Project Area and cover an area of approximately 8.2 acres combined. Parcels L, M-2, and W-1/W-2 are each currently occupied by surface parking lots. Parcel Q is occupied by a three-story, steel and concrete parking structure. Parcels W-1/W-2 are located directly south of First Street from the Civic Mall and are bounded on the east by Hill Street, which also forms the eastern boundary of the Bunker Hill Urban Renewal Project Area. The northeast corner of Parcels W-1/W-2 adjoins the Civic Center subway station along the Metro Red Line. Parcels M-2 and L are located on the west side of Grand Avenue, and are bounded by Hope Street to the west, General Thaddeus Kosciuszko Way to the south, Grand Avenue to the east, and Second Street on the north. The Walt Disney Concert Hall is located directly to the north of Parcel L; the Grand Promenade Apartments are located further south of Walt Disney Concert Hall on Parcel M-1; and the Museum of Contemporary Art (MOCA), the Colburn School of Performing Arts and the Grand Avenue entrance to the Omni Hotel are located to the east directly across Grand Avenue. The location of the five parcels is shown in Figure A-2 on page A-5. With the conjoining of freeway, rail, light rail, subway, and bus services, downtown Los Angeles serves as the regional transportation center for Southern California. Intersecting freeways in the downtown area include the Harbor, Hollywood, Santa Ana, Pasadena, San Bernardino, and Santa Monica Freeways. The Hollywood/Santa Ana Freeway (US 101) is located approximately two blocks to the north of the Project site, and the Harbor/Pasadena Freeway (SR 110) is located approximately three blocks to the west of the Project Site. Los Angeles Union Station, located on Alameda Street approximately one-half mile northeast of the Project site, is the hub for the regional Metrolink Rail system, a system of rail lines providing commuting service between downtown Los Angeles and Ventura County, Antelope Valley, San Bernardino, Riverside, Orange County, and Fullerton/Riverside. Union Station also receives rail traffic from broader areas throughout the state and nation. The Metropolitan Transit Authority (Metro) Metrorail Red, Blue and Gold Lines also serve downtown Los Angeles. The Metro Red Line is a subway providing connection between Union Station and North Hollywood. The Metro Blue Line, which connects to the Metro Red Line at 7th Street, is a light rail line running between Los Angeles and Long Beach. The Metro Blue Line also provides connection to the east-west Metro Green Line, a light rail line in the southern portion of the metropolitan area. The Metro Gold Line provides service from Union Station to Pasadena. Downtown Los Angeles is also served by numerous local, limited, and express bus lines, including Metro buses which provide service throughout the entire metropolitan area and connection to the Metrolink lines; buses from surrounding cities, including Santa Clarita Transit, Santa Monica Big Blue Bus, and Simi Valley Transit, which provide service between downtown

LEGEND

 Project Site



Scale in approximate miles
 Source: Eagle Aerial, May, 2001.

Figure A-2
Proposed Project Site

Los Angeles and regional communities; and Los Angeles Department of Transportation (LADOT) buses, which include the downtown Los Angeles DASH shuttle buses and commuter express buses. The LADOT commuter express buses provide service between downtown Los Angeles and the San Fernando Valley, West Los Angeles, East Los Angeles, and the South Bay area.

C. DESCRIPTION OF THE PROPOSED PROJECT

The Project as currently foreseen would be developed in a series of phases. Initially, the Project would involve the development of Parcel Q concurrently with the redevelopment of the Civic Mall. Improvements to Grand Avenue, from Second Street to Temple Street, would also be implemented concurrently with the development of Parcel Q. Parcels W-1/W-2, L, and M-2 would be developed at a later period, along with the completion of the proposed Grand Avenue streetscape program, from Fifth Street to Second Street and from Temple Street to Cesar Chavez Avenue. Total development proposed for the five proposed parcels consists of up to 2,060 residential units, 20 percent of which (up to 412 units) would be provided as affordable housing; approximately 225 hotel rooms; up to 479,500 square feet of retail space; up to 600,000 square feet of commercial office space; and up to 5,500 parking spaces. All proposed parking would be provided in podium and subterranean parking structures. An overview of the Project's current Conceptual Plan is provided in Figure A-3 on page A-7. A summary of the Project's proposed land uses for each parcel is presented in Table A-1 on page A-8.

The proposed Civic Park (formerly Civic Mall) maintains the existing organization of space as three major areas: Grand Avenue to Hill Street; Hill Street to Broadway; and Broadway to Spring Street. The westernmost, approximately 8-acre section is proposed to be utilized for cultural and entertainment uses. The middle, approximately 4-acre section is proposed to be used as a garden space and the easternmost, approximately 4-acre section is proposed to be used for civic and community activities. Surface parking on the easternmost area of the park would be removed, and this parking would be relocated to the lower levels of the parking structure beneath the middle section (i.e., beneath the Court of Flags) structures which are currently unavailable but would be renovated and re-opened to the public under the proposed Project. The programmed uses for Civic Park are summarized in Table A-2 on page A-9.

The Grand Avenue Streetscape Program extends from Cesar Chavez Avenue on the north to Fifth Street on the south. Streetscape improvements from Second Street to Temple Street would be implemented concurrently with the development of Parcel Q, while streetscape improvements between Temple Street and First Street would be implemented concurrent with the proposed Civic Park improvements.

Table A-1

PROPOSED PROJECT LAND USE SUMMARY

Project Component/Site	Scope of Development				
Civic Park Improvements:	16 Acres				
Grand Avenue Streetscape:	Fifth Street to Cesar Chavez Avenue				
	Residential^a				
	Total Units	Affordable Units	Retail (sq.ft.)	Hotel (Rooms)	Office (sq.ft.)
Development Sites					
Parcel Q	500	100	292,000	225	0
Parcels W-1/W-2	710	142	62,500	0	600,000
Parcels L/M-2	<u>850</u>	<u>170</u>	<u>125,000</u>	<u>0</u>	<u>0</u>
Total (All Parcels)	2,060	412	479,500	225	600,000

^a Affordable units are not in addition to, but are included in the total units. Total affordable units will represent 20 percent of the maximum number of units in the approved development plans.

Source: The Related Companies, July 2005.

1. Proposed Development Standards

Development proposed on the five parcels would be guided by the establishment of building heights, building setbacks, and parking ratios. Building height standards are organized according to individual blocks. Building height standards would include a height overlay zone and a supplemental height zone that would allow building heights on portions of each development block to reach a higher height. For example, the Conceptual Plan envisions two towers on Parcel Q consisting of a residential tower of approximately 30 stories and a separate hotel tower of approximately 50 stories. In order to establish a development framework whereby pedestrian access to structures would be facilitated, the Project would have zero building setbacks. Parking would be provided in podium and subterranean structures across the five development sites according to code or better for each of the Project's uses.

2. Conceptual Plan

A Conceptual Plan for the Project has been formulated to represent a potential development scenario that depicts the basic intent of the Project. However, since the configuration and exact location of uses have not been determined, the Conceptual Plan does not represent the only development scenario that would be possible. Notwithstanding, set parameters for the Project's three components include: (1) programmed uses for Civic Park; (2) the geographic extent of future streetscape improvements along Grand Avenue; and (3) the total amount of residential, retail, and total uses, as well as building heights for the five development parcels. Figure A-3 on page A-7 presents the Project's current Conceptual Plan.

Table A-2

CIVIC PARK PROGRAMMED USES

Programmed Use	Approximate Area	Civic Park Locations
Daily/Permanent events and activities, including passive park use.	16 Acres	Integrated throughout the Civic Park
Park-wide events and activities	16 Acres	Infrastructure in all zones would provide for large-scale events over the entire Civic Park
Cultural and entertainment	8 Acres	Concentrated between Grand Avenue and Hill Street
Garden	4 Acres	Concentrated between Hill Street and Broadway
Civic and Community	4 Acres	Concentrated between Broadway and Spring Street

Source: The Related Companies, April 2005.

The current Conceptual Plan for Civic Park, as shown in Figure A-4 on page A-10, includes a Great Lawn and a Grand Terrace in the westernmost section, in which the focus would be on cultural and entertainment uses. Most of the existing trees and shrubs would be removed or relocated for the construction of a new lawn, garden, and plaza spaces. New restrooms, as well as other pavilions, would also be constructed. The proposed design also provides for new stepped terraces from the Grand Avenue plaza down to the current level of the garage escalators. New enclosures for the existing escalators, which connect to the park from the garage below, would be constructed and the escalators would be kept in operation as continuously as possible during construction. The existing fountain, but not the pools below it, may be dismantled and reassembled, possibly in another location within Civic Park. As previously stated, the parking structure below this area would be retained and would remain open, to the extent possible, during the construction of the new Civic Park, as well as during minor garage remodeling.

Potential improvements to the streetscape have been developed in the Conceptual Plan. Streetscape improvements, as shown in Figure A-5 on page A-11, are anticipated to include wide, shaded sidewalks, landscaping, and streetscape activities, as well as a range of street furnishings. Wider sidewalks along the segment of Grand Avenue proposed for improvement are intended to facilitate and improve pedestrian movement and create a positive environment for sidewalk cafes, special events, and building entrances.

The Conceptual Plan, as shown in Figure A-6 on page A-12, envisions a 40- to 50-story hotel/residential tower on Parcel Q and that the hotel would have a total of up to 225 rooms in a tower format, with an entrance on Grand Avenue. The Conceptual Plan for Parcel Q also includes a 25- to 35-story residential tower, which, under the Conceptual Plan, would be constructed near the southwest corner of First Street and Olive Street. The retail component of

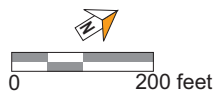
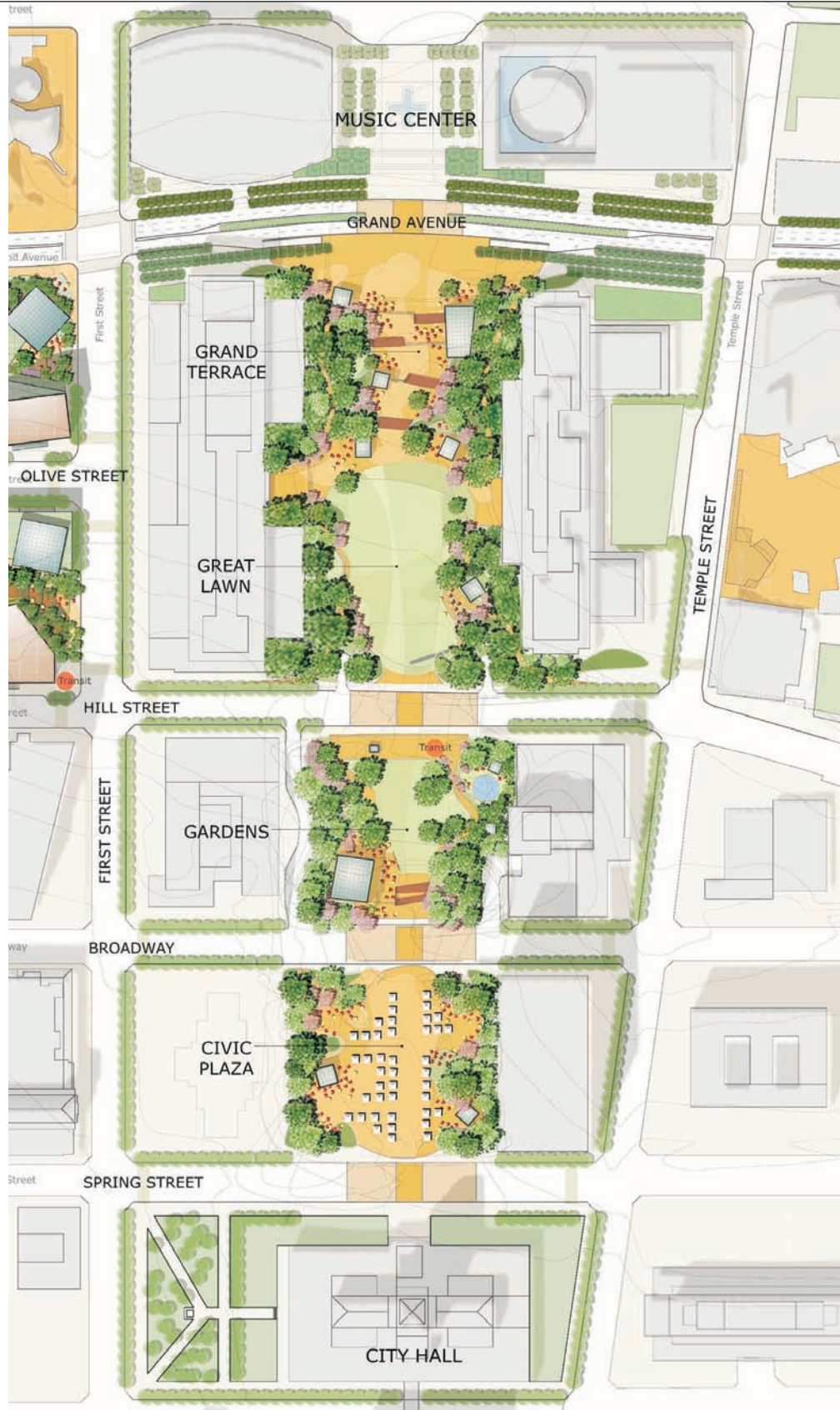


Figure A-4
Conceptual Plan for Civic Park

Source: Grand Avenue The Related Companies, 2005



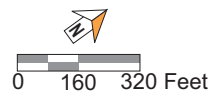
The Plan Proposes the Following Improvements:

The goal of the Grand Avenue street improvements will be to create an urban thoroughfare through a key area of downtown Los Angeles. These improvements are intended to foster an active pedestrian environment without compromise to the functional requirements of vehicular circulation.

Toward this end, sidewalks will be widened wherever feasible from Fifth Street north to Cesar Chavez Avenue, and planting beds will be maximized in order to promote the growth of healthy and mature street trees. The existing mid-street openings along Grand Avenue will be examined with the intent of either replacing these spaces with planted medians, or providing additional roadway to compensate for widened sidewalks. Such improvements are not intended to decrease existing vehicular capacity, and existing on-street parking will be maintained wherever feasible.

A varied landscape will be implemented. The landscape will be comprised of trees providing extensive shade and seasonal color for the street, as well as flower beds and other plantings.

Contemporary benches and lights will be introduced. These furnishings will provide a consistent and modern identity for the street, and will elevate the quality of the street environment.



Scale in approximate feet

Source: Grand Avenue The Related Companies, 2005

Figure A-5
Conceptual Plan for
Grand Avenue Streetscape Program

PARCELS L+M-2

- RESIDENTIAL
- RESIDENTIAL
- RESIDENTIAL
- RETAIL/PARKING PODIUM



PARCELS W-1/W-2

- RESIDENTIAL
- RETAIL/SERVICES
- CULTURAL/RETAIL
- OFFICE or RESIDENTIAL

PARCEL Q

- CULTURAL/RETAIL
- HOTEL + RESIDENTIAL
- RETAIL/SERVICES
- RESIDENTIAL



Figure A-6
Conceptual Parcel Development Plan

Source: Grand Avenue The Related Companies, 2005

Parcel Q, under the Conceptual Plan, would be developed as a collection of shops, restaurants, entertainment, and food uses spanning several floors. Retail uses would also be located along Grand Avenue to enhance pedestrian activity along the street.

The Conceptual Plan, relative to Parcels W-1/W-2, includes a bridge across Olive Street to connect Parcel Q's public space and Parcels W-1/W-2. This bridge would integrate Parcel Q's open space and, by extension, connect Parcels W-1/W-2 with Grand Avenue. In turn, the public open space on Parcels W-1/W-2 would provide to Parcel Q extensions to Hill Street, First Street and Second Street. Thus, the public space of Parcels Q and W-1/W-2 would provide linkages between both blocks to the surrounding streets and adjoining uses. Parcels W-1/W-2, under the Conceptual Plan, would be designed to reinforce the overall planning objectives of the proposed streetscape improvement program for Grand Avenue, including trees, landscaping, paving systems, benches, trash receptacles, street graphics, and lighting, as defined in the Grand Avenue streetscape program.

Under the Conceptual Plan, Parcels L and M-2 would be developed with street-front retail uses. Hope, Second, and Third Streets, as they adjoin Parcels L and M-2 and would be designed with pedestrian friendly street edges that are enhanced with entrances to residential buildings and streetscape amenities, including trees, landscaping, paving systems, benches, trash receptacles, street graphics, and lighting, as defined in the Grand Avenue Streetscape Program.

3. Equivalency Program

An Equivalency Program to provide flexibility for modifications to land uses and square footages within the five parcels would be incorporated into the Project in order to respond to the future needs and demands of the southern California economy and changes in Project requirements. The Equivalency Program defines a framework within which land uses can be exchanged for certain other permitted land uses so long as the limitations of the Equivalency Program are satisfied and no additional environmental impacts occur. All permitted Project land use increases can be exchanged for corresponding decreases of other land uses under the proposed Equivalency Program.

D. CONSTRUCTION/PHASING

Development of the proposed Project is anticipated to occur in three phases. The initial phase would include the simultaneous completion of the Civic Park; streetscape improvements to the portion of Grand Avenue fronting Parcel Q, between 1st and 2nd Streets; and the complete development of Parcel Q. Commencing in 2006, construction of the Project's first phase is anticipated to be completed in 2008/09.

The second phase of Project construction would include the complete development of Parcels L and M-2. The third phase would include the complete development of Parcels W-1/W-2 and the completion of street improvements on Grand Avenue, between Second Street and Fifth Street and from Temple Street to Cesar Chavez Avenue. Buildout of the entire Project is forecasted to occur in 2015.

ATTACHMENT B
ENVIRONMENTAL IMPACT ANALYSIS

This section discusses those impacts identified in the Initial Study Checklist as “potentially significant” and “less than significant”. It also includes a discussion of those impacts identified as “no impact” for purposes of providing full disclosure.

I. AESTHETICS. *Would the Project:*

a. Have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. A scenic vista is a view of a visually interesting natural or man-made feature. Examples of scenic vistas include views of urban skylines and distant landforms, such as mountain ranges, that may be viewed from public locations. In the area surrounding the Project site, the variety and scope of surrounding urban development, including high-rise towers to the south and west, including the Wells Fargo Center, California Plaza, and the Library Tower, and the notable architecture associated with the Los Angeles Music Center, the Walt Disney Concert Hall, and the Cathedral of Our Lady of the Angels form a scenic vista, viewed from either a near or a distant location. Since view opportunities of this area are available from public locations, views of the urban area surrounding the Project site are considered valued scenic vistas. The Project would replace existing unsightly parking lots with landmark high-rise and mid-rise buildings. Although these structures may contribute positively to existing scenic vistas, the potential exists for the proposed high-rise structures to also block existing scenic vistas from public locations (i.e., from adjacent public streets and view locations, or from more distant locations). In order to determine the significance of the Project in relation to existing scenic vistas, additional analysis of this issue in an Environmental Impact Report will be conducted and mitigation measures will be proposed, as required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

Potentially Significant Impact. The City of Los Angeles designates public roadways, noted for scenic vistas, as scenic highways. No designated scenic highways occur in proximity to the Project site. As Project development may have potentially significant direct and/or indirect impacts on historical resources (see Section V.a. of this Attachment B for further analysis), further analysis in an Environmental Impact Report will be conducted, and mitigation

measures will be proposed, as required. No natural scenic resources, such as rock outcroppings or other unique geologic features, are evident in the surrounding urban environment or on the Project site. As Project development would result in less than significant impacts with regard to substantial damage to natural scenic resources, no mitigation measures are necessary and no further analysis of these particular issues in an Environmental Impact Report is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact. The existing, underutilized County Mall, Grand Avenue, and five parcels containing a steel parking structure and three asphalt surface parking lots define the existing visual character of the Project site. Due to the demolition of curbs, sidewalks, parking lots, and existing features in the Civic Mall, and the removal of mature vegetation in the Civic Mall and existing street trees, construction of the Project would cause a temporary degradation of the visual environment. In addition, the unfinished stages of development and the presence of construction equipment, haul trucks, cranes, temporary fencing, and general disruption of sidewalks and curbs along the edges of the existing Project site may be considered visually unattractive. The developed Project, however, would not substantially degrade the existing visual character or quality of the site and would upgrade the visual character of all parcels, including the Grand Avenue right-of-way. Notwithstanding, additional analysis of this issue in an Environmental Impact Report will be conducted and mitigation measures will be proposed, as required.

d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. The Project site's location in Downtown Los Angeles places it in a dense urban area characterized by clusters of notable structures and high-rise towers that produce varying degrees of light and glare. Outdoor lighting is currently present along the Grand Avenue right-of-way and within the County Mall. Limited lighting is also associated with the parking structure in Parcel Q. Parcels W-1/W-2, L, and M-2 are surface parking lots, which are moderately lit at the street surface. The Project would introduce new lighting sources throughout Civic Park. Streetscape improvements along Grand Avenue include an increase in lighting. In addition, the five parcels are proposed to be developed with several high-rise and mid-rise towers, including a hotel/residential tower of up to 50 stories, and associated retail uses. Signage and light spillage from the Project's high-rise buildings and retail uses would increase ambient light, as well as provide a potential source of glare during the daytime and nighttime. Furthermore, the introduction of the Project's mid- and high-rise structures may result in shading impacts on adjoining and nearby land uses. In order to determine the significance of the Project in relation to potential light and glare as well as shading impacts, additional analysis of these

issues in an Environmental Impact Report will be conducted and mitigation measures will be proposed, as necessary.

II. AGRICULTURAL RESOURCES. *Would the Project:*

- a. **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The Project site is located in and surrounded by the Downtown Los Angeles civic, business and entertainment center. No agricultural uses or related operations exist within the site or surrounding area. Due to its urban setting, the site area has not been mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed Project would not result in impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- b. **Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?**

No Impact. The Project site is zoned for regional commercial and high density residential uses. No agricultural zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act. Therefore, no conflict exists with agricultural zoning or Williamson Act contracts, and no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- c. **Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?**

No Impact. No agricultural uses or related operations exist on or near the Project site. As such, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

III. AIR QUALITY. *The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the Project result in:*

a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?

Potentially Significant Impact. The Project site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted in 2003 and outlines the air pollution control measures needed to meet Federal health-based standards for ozone (1-hour standard) by 2010 and particulate matter less than 10 microns in diameter (PM₁₀) by 2006.¹ It also demonstrates how the Federal standard for carbon monoxide, achieved for the first time at the end of 2002, will be maintained.² This revision to the AQMP also addresses several State and Federal planning requirements and incorporates substantial new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological data and new air quality modeling tools. Development of the Project as proposed advances several key policy directives set forth in the AQMP. For example, the Project utilizes a previously developed site within an established urban center; locates new development within an area that is well served by existing transit facilities; and locates residential units within a major regional employment center. Notwithstanding these positive attributes, the Project would generate air emissions that could impede implementation of the AQMP. As such, the analysis of the Project's consistency with the AQMP will be provided in an Environmental Impact Report.

Potential Project impacts associated with the Los Angeles County Congestion Management Plan are addressed in Section XV.g (Transportation/Circulation).

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. As indicated above, the Project site is located within the Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, with Los Angeles County among the

¹ *The South Coast Air Quality Management District Governing Board adopted the 2003 Air Quality Management Plan (AQMP) on August 1, 2003.*

² *The Basin has technically met the CO standards since 2002, but the official attainment status has not been reclassified by the USEPA.*

highest of the counties that compose the Basin in terms of non-attainment of the standards. The Basin is currently in non-attainment for the Federal and State 1-hour ozone (O₃) standard, the Federal 8-hour O₃ standard, the Federal and State PM₁₀ standard, and the Federal PM_{2.5} (particulate matter less than 2.5 microns in diameter) standard.

Implementation of the proposed Project would increase emissions on both a short-term (i.e., during construction) and long-term basis in a non-attainment area. Short-term construction emissions would result from a number of sources, including, but not limited to, the operation of heavy-duty construction equipment and on-site grading. Long-term emissions would principally result from motor vehicles traveling to and from the site once the Project is operational. As the Project could result in increased air emissions associated with construction and operation, this issue will be analyzed in an Environmental Impact Report and feasible mitigation measures will be incorporated, as necessary.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. Since the Project would result in increases in air emissions from construction and operations (e.g., vehicle trips and stationary sources) in the South Coast Basin, which is currently in non-attainment of Federal and State air quality standards for ozone, PM₁₀ and PM_{2.5}, implementation of the proposed Project could potentially contribute to air quality impacts when combined with other existing and future emission sources in the area. An analysis to determine cumulative air quality impacts and to evaluate whether the Project would contribute substantially to these emissions will be included in an Environmental Impact Report. Mitigation measures will be recommended, as appropriate, to reduce potential air quality impacts. Also, refer to Sections III (a) and III (b) of this Attachment B.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Construction activities and operation of the proposed uses would increase air emissions above current levels. Land uses that are considered more sensitive to air pollution than others are as follows: hospitals, schools, residences, playgrounds, child care centers, athletic facilities, and retirement/convalescent homes.³ Sensitive receptors in the Project vicinity may include, but are not limited to, the Colburn School of Performing Arts, located directly across Grand Avenue from Parcel L; the Grande Promenade Apartments, a high-rise residential use located on Parcel M-1 on the west side of Grand Avenue, the Angelus Plaza residential complex for seniors on Hill Street south of Parcel W-1, as well as future residential

³ South Coast Air Quality Management District, *CEQA Air Quality Handbook, Figure 5-1, April 1993.*

uses within the proposed Project. Due to the proximity of sensitive receptors in the area, further evaluation of potential impacts associated with the potential exposure of these and potentially other sensitive receptors to pollutant concentrations will be included in an Environmental Impact Report and feasible mitigation measures will be incorporated, as necessary.

e. Create objectionable odors affecting a substantial number of people?

Potentially Significant Impact. Emissions from construction equipment operating on the Project site may create temporary objectionable odors. However, these odors from construction equipment would mainly be limited to the immediate environs of the Project site. Odors, following Project construction, are typically associated with industrial Projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. As the Project involves the development of residential, retail, hotel and office uses, no elements related to these types of odor producing uses are anticipated. Construction activities could result in odorous emissions. Therefore, further analysis of odors will be included in an Environmental Impact Report, and mitigation measures will be identified as needed.

IV. BIOLOGICAL RESOURCES. *Would the Project:*

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. According to a search of the California Department of Fish and Game's (CDFG) Natural Diversity Database (CNDDDB), there are no species designated as endangered and/or threatened within a 0.5-mile radius of the Project site.⁴ The site and its surrounding areas are completely urbanized and the existing vegetation on-site consists of ornamental landscaping. Removal of the on-site landscaping would have no adverse effect on sensitive or threatened species, as defined by the CDFG or U.S. Fish and Wildlife Service. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

⁴ California Department of Fish and Game's Natural Diversity Database, Geographic Information Systems data search, April 2004.

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

No Impact. The Project site is not located in or adjacent to a significant ecological area (SEA), as determined by the City of Los Angeles.⁵ Furthermore, as previously stated, the Project site is located in an urbanized area, and the landscaping on the site is ornamental in nature. No riparian habitat or other sensitive natural communities exist on-site. Therefore, implementation of the Project would not result in a substantial adverse effect on riparian habitat or other sensitive natural community. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

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

No Impact. The Project site does not contain any federally protected waters or wetlands as defined by Section 404 of the Clean Water Act. Therefore, implementation of the Project would not result in a substantial adverse effect on federally protected wetlands. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The Project site is located in the City of Los Angeles downtown civic and business district and, as such, is surrounded by office and commercial buildings in a dense urban landscape. The site does not function as a wildlife corridor, and no bodies of water exist on-site to provide habitat for fish. Therefore, development of the Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor would it impede the use of native wildlife nursery sites. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

⁵ *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B.*

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

Less Than Significant Impact. No locally protected biological resources exist on the site. Although all mature ornamental trees in the County Mall are proposed to be removed, many of these would be relocated. In addition, new landscaping would be installed throughout the revitalized Civic Park. Trees removed in the public right-of-way on Grand Avenue would be replaced by street trees, in accordance with the Grand Avenue Implementation Plan. All street frontages and sidewalks along the proposed development sites would be planted with shade and ornamental trees, in accordance with the City's street tree ordinance. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

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

No Impact. As previously discussed, the Project site is currently developed and is located in a highly urbanized area. The site is not located in or adjacent to an existing or proposed SEA. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan in place for the Project site. As such, implementation of the Project would not conflict with any habitat conservation plans, and mitigation measures are not necessary. Therefore, no further analysis of this issue in an Environmental Impact Report is required.

V. **CULTURAL RESOURCES:** *Would the Project:*

- a. **Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?**

Potentially Significant Impact. The Los Angeles Civic Center was originally intended to reflect the principles of the City Beautiful Movement of the early 1900s. With a major axis bisecting a north/south axis, the Los Angeles Civic Center has evolved into a formally planned central area but also includes new construction. Several buildings associated with the Civic Center that are adjacent to the proposed Project site include the Los Angeles City Hall (1926-28) and the Hall of Justice Building (1925). Both properties have been previously assessed and identified as historical resources. A number of additional buildings and features were built in

connection with the urban renewal of the area following World War II, including the Los Angeles County Courthouse (1958) designed by a consortium of architects including J.E. Stanton and Paul R. Williams; the Hall of Administration building (1956-61) by architects Stanton, Stockwell, Williams, and Wilson; the Richard J. Neutra and Robert Alexander designed Hall of Records building (1961-62); and the Music Center complex (1964-69) by Welton Becket and Associates. Situated between the Los Angeles County Courthouse and the Hall of Administration is the Paseo de los Pobladores (1961), also by Stanton, which consists of a landscaped central mall featuring a series of terraces, pools, and steps leading up the hill from Broadway to Grand Avenue. Although these post World War II buildings and landscape features are less than 50 years old, the general threshold for National Register eligibility, because of their architectural design, associations with notable architects, and being a part of the City's Civic Center development they may be notable for their historical, cultural, and/or architectural importance. The County has evaluated some of these buildings individually as well as looked at the potential for listing of the Civic Center as an historic district. However, no formal designation has occurred as of the preparation of this Initial Study.

New construction in the immediate area includes the Frank O. Gehry designed Walt Disney Concert Hall (1988-2003), the Museum of Contemporary Art (MOCA) by Arata Isozaki and Gruen Associates (1981-1986), as well as the Colburn School of Performing Arts (1998) by Hardy, Holzman and Pfeiffer. These buildings, though much less than fifty years of age, may possess exceptional architectural and/or cultural importance and, therefore, need to be considered.

Based on a preliminary survey of the Project site and a review of relevant background data, it is concluded that the proposed Project may have potentially significant direct and/or indirect impacts on historical resources since the Project site encompasses large portions of Los Angeles' downtown Civic Center that includes a variety of notable buildings and associated spaces which were erected as early as the 1920s. Prior surveys of historical resources in the Project area include the *Architectural/Historic Survey of the Central Business District Redevelopment Project Area* (Roger G. Hatheway and Associates, 1980), *Determination of Eligibility Report for the Central Business District* (Roger G. Hatheway and Associates, 1983), and *The Historic Resources in Context for the Central Business District Redevelopment Project Area* (Los Angeles Conservancy, 1990). Because of the possibility for Project-related effects to occur to historic resources, further analysis will be required in an Environmental Impact Report to assess potential Project impacts (direct or indirect) on those buildings and associated features identified as historic resources, pursuant to Section 15064.5(a) of the CEQA Guidelines.

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

Less Than Significant Impact. The Project site is located within a highly urbanized area and has been previously disturbed through grading and construction activities. The area comprising and surrounding the Project site has been developed for more than 150 years. In addition, the redevelopment of the Bunker Hill area, in implementation of the Bunker Hill Urban Renewal Project, required substantial changes to grade and changes in subsurface conditions. Any archaeological resources that may have been on, or just under, the ground have likely been removed or disturbed by the previous or existing development on the site. A records search through the California Historic Resources Information System revealed five historic archaeological sites (or features) and one isolate within the Project area. In addition, remains of the Pacific Electric Railway Tunnel under Fort Moore Hill border the Project Area. The sites reported in the Project area were discovered below ground, during construction. As such, new development could result in a significant impact on archaeological resources on portions of the site that have not been previously disturbed, or by excavation deeper than earlier construction. Any potential impacts that may occur would be reduced to less than significant levels via the application of the City's and CRA/LA standard archaeological condition which requires that during excavation and grading, if archaeological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. The area of discovery shall be protected from disturbance while a qualified archaeologist evaluates the significance of the find and, if necessary, in consultation with appropriate officials and the State Historic Preservation Office (SHPO) determines an appropriate treatment plan. Construction activities in that area may resume once the treatment plan has been implemented. Via the application of the above-stated City standard and CRA/LA condition and compliance with federal, State of California and local regulations for the treatment of discovered archaeological resources, potential impacts would be reduced to a less than significant level. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The area comprising and surrounding the Project site has been developed for more than 150 years. In addition, the redevelopment of the Bunker Hill area required substantial changes to grade and changes in subsurface conditions. Although the Project site has been previously developed, any substantial excavations may well encounter fossil vertebrate remains based on the known occurrence of vertebrate fossils.

A Paleontological records search was conducted by the Natural History Museum of Los Angeles County on July 22, 2005 in support of this Initial Study. The records search indicates

that one known locality probably lies directly within the proposed Project area, and several others lie nearby. The sediments involved range from late Miocene through Pleistocene. Known fossils from these localities include bony fish, sharks, birds, and mammoth. It was also noted in the records search that all geological units in the vicinity likely contain fossils. Given the high sensitivity of the area, the potential for discovering unrecorded, paleontological resources does exist. However, any potential impacts that may occur would be reduced to less than significant levels via the application of the City's and CRA/LA standard paleontological condition and compliance with applicable State of California regulations, which require that during excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted and the area of discovery protected so as to allow a qualified paleontologist to determine the value of the resource and, in consultation with appropriate agencies, determine an appropriate treatment plan. Construction activities in that area may resume once the uncovered resources are collected by a paleontologist, as appropriate, and properly processed.

As Project development would occur in compliance with the City's and CRA/LA standard paleontological condition and with State of California regulations for the recovery of discovered paleontological resources, potential impacts would be reduced to a less than significant level. Therefore, no mitigation measures are necessary, and no further analysis of this issue in an Environmental Impact Report is required.

d. Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. The Project site is located within a highly urbanized area. Within the Project area, any traditional burial sources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious, burial, or heritage reasons, would likely be associated with the Native American group known as the Gabrielino/Tongva. A Sacred Site search was conducted in support of this Initial Study by the Native American Heritage Commission (NAHC). Although their records did not indicate the presence of any burials or other sacred lands, the NAHC provided a list of organizations and individuals that may have information on the presence of Native American burials within or near the Project area. No known traditional burial sites or other types of cemetery usage have been identified within the Project site or nearby vicinity. In 1957, however, site 19-120015, consisting of a human burial covered by nine feet of sediment and overburden was discovered outside the Project area. The site record refers to the find as "human skull found in 1957" and notes that the remains are heavily fragmented and were not studied further. Deep excavation or excavation in undisturbed soils has the potential for the discovery of human remains or related resources.

Any accidental discovery of human remains or related resources would be treated in accordance with federal, state, and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, including CEQA Guidelines Section 15064.5(e).

Therefore, no further analysis of this issue in an Environmental Impact Report is required and no additional mitigation measures are necessary.

VI. GEOLOGY AND SOILS. *Would the Project:*

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

Less Than Significant Impact. The Project site is located in the seismically active Southern California region, which is characterized by major faults and fault zones. Faults are classified as active, potentially active, or inactive. For the purposes of the Alquist-Priolo Earthquake Fault Zoning Map Act, the State of California defines active faults as faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch).⁶ Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones around potentially active and active faults to establish hazard potential.⁷

Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. Active and potentially active faults which are deemed capable of producing fault rupture due to seismic activity have ground rupture potential and may be expected to generate movement at the surface ranging from a few inches to approximately six feet. The City has established an area of approximately one-eighth mile on each side of these potentially active and active faults, known as Fault Rupture Study Zones, to establish hazard potential. The State, for purposes of planning, zoning, and building regulation functions, provides maps to city and county agencies designating Alquist-Priolo Earthquake Fault Zones. The Project site, consisting of the Grand Avenue right-of-way, the Civic Park, and the five development parcels is not located within a city-designated Fault Rupture Zone or State-designated Alquist-Priolo Earthquake Fault Zone. Thus, the potential for

⁶ *California Department of Conservation, California Geologic Survey. Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch), but do not displace Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present.*

⁷ *City of Los Angeles General Plan Safety Element, Exhibit A, adopted by the City Council, November 26, 1996.*

fault rupture on the site is very low. However, the Project would be subject to similar seismic risks as other development throughout the City of Los Angeles. The proposed buildings would be designed to resist ground shaking through modern construction techniques. The Project would comply with the California Department of Conservation, California Geologic Survey Special Publications 117, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the Los Angeles Municipal Code (LAMC). With adherence to applicable regulations, the potential to expose people to impacts from fault rupture resulting from seismic activity during the design life of the buildings is considered less than significant. Therefore, no mitigation measures, beyond compliance with the aforementioned regulations, are necessary and no further analysis of this issue in an Environmental Impact Report is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project site is located within the seismically active Southern California region, all of which is subject to some degree of ground shaking due to earthquakes. As mapped by the Southern California Earthquake Data Center, 31 faults are located within a 50-mile radius of the site.⁸ The Elysian Park Structure of the Whittier Fault, located approximately 2.5 miles north of the Project site, is the nearest fault. This fault, as well as any other of the 31 faults in a 50-mile radius, could produce seismic ground shaking that may affect the Project site. However, development of the Project would comply with applicable requirements as defined by the Uniform Building Code for California Seismic Zone IV and City of Los Angeles Building and Safety regulations. Compliance with these requirements would reduce potential adverse effects due to seismic ground shaking to acceptable levels. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The Project site is not located within or near an area susceptible to liquefaction, as indicated on the City of Los Angeles Safety Element (i.e., Areas Susceptible to Liquefaction delineation map).⁹ In addition, all on-site development would be in compliance with the City Building Code, which contains requirements and standards designed to limit potential significant impacts due to seismic events to acceptable levels. Therefore, development of the proposed Project would not expose people to significant impacts related to

⁸ Southern California Earthquake Data Center, www.data.scec.org/faults/lafault.html#MAP, 2004.

⁹ City of Los Angeles Department of City Planning, *Safety Element of the General Plan, Exhibit B* (November 1996).

ground failure, including liquefaction. No further mitigation is necessary and no further analysis of this issue in an Environmental Impact Report is required.

iv. Landslides?

Less Than Significant Impact. Landslides are earthquake-induced ground failures that occur primarily in areas with steep slopes, which have loose, granular soils that lose their cohesive characteristics when water-saturated. According to the California Geologic Survey, the Project site is not located in a delineated landslide zone.¹⁰ Thus, the potential for seismic-related ground failure related to landslides is less than significant. Therefore, no mitigation measures are necessary, other than compliance with the City of Los Angeles Building Code structural design standards and other building regulations which require geotechnical analysis of any building site prior to construction. No further analysis of this issue in an Environmental Impact Report is required.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project site would include the grading and excavation of the five development parcels and removal of landscaping over the Civic Mall and construction of the proposed Grand Avenue streetscape improvements. These construction activities would expose soils to wind. During the construction phase of the Project, activities are subject to the requirements of the Countywide National Pollutant Discharge Elimination System (NPDES) Construction Permit. Compliance with the NPDES permit includes the implementation of Best Management Practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil. As the Project would include grading and excavation, BMPs would be used to ensure that soil erosion is reduced to the maximum extent possible. In addition to the NPDES permit, a Local Storm Water Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan (WWECP) would also be developed for the Project. Further, conformance with the City Building Code, including implementation of an erosion control plan, would reduce the potential for wind or waterborne erosion during the construction process. Therefore, Project impacts related to soil erosion during the construction phase are anticipated to be minimal, and no mitigation measures are required.

Once operational, all areas constituting the Project Site would be improved with structures, landscaping, and streetscape improvements. A Standard Urban Storm Water Management Plan (SUSMP) would be developed for the requisite Project components to reduce the potential for pollutants, including soils, to run off from the site. The SUSMP is a working plan that is systematically reviewed and revised to ensure that BMPs are functioning properly

¹⁰ *Ibid.*

and are effective at treating runoff from the site for the life of the Project. Therefore, no additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

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

Less Than Significant Impact. The Project site is not located within an area susceptible to landslides or unstable soil conditions; nor is the Project site located within an area susceptible to liquefaction. Compliance with City Department of Building and Safety recommended construction techniques and applicable City building and safety codes and permit regulations would ensure that no significant impacts related to geologic conditions would occur. Therefore, no additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Less Than Significant Impact. Expansive soils are typically those of high clay content that swell and shrink during wet and dry climatic events, respectively. All on-site construction would comply with current Building Code requirements, which limit significant impacts related to expansive soils to less than significant levels. If on-site soils were determined to have substantial shrink-swell potential, appropriate engineering solutions would be incorporated into the Project to avoid this potential. Therefore, no additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Impact. The Project site is located in an urban area served by existing sewer infrastructure. Since the Project would not involve the use of septic tanks or alternative wastewater disposal systems, no impact would occur. Therefore, no further analysis of this issue in an Environmental Impact Report is required.

VII. HAZARDS AND HAZARDOUS MATERIALS. *Would the Project:*

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact. Construction of the proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. As such, construction of the Project would not create a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials, and no mitigation measures are required.

In addition to street improvements, the Project consists of public parkland and residential and commercial development. Such uses would not generate large amounts of hazardous materials that would require routine transport, use, or disposal. Operation of the Project would involve the use of landscaping chemicals and the storage of cleaning products. The use and storage of such materials would occur in compliance with applicable standards and regulations, and would not pose significant hazards to the public or the environment through the transport, use, or disposal of hazardous materials. Therefore, no additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less Than Significant Impact. The use and operation of the Project would not result in hazardous conditions or activities. Construction of the Project could involve some transport of hazardous materials. However, there is not a reasonably foreseeable chance of upset or accident resulting from the construction of the Project. The Project site is surrounded by several oil fields including the Los Angeles City Oil Field, north of the Project site in the vicinity of Cesar Chavez Avenue and the Hollywood Freeway; the Union Station Oil Field, east of the Project site in the vicinity of Alameda Street; and the Los Angeles Downtown Oil Field, south of the Project site in the vicinity of STAPLES Center. Although the Project site is not located within an oil field or an oil drilling area, Parcel L is located in a Methane Buffer Zone, identified under the Division 71, Methane Seepage Regulations, of the City's Building Code. The Methane Buffer Zone is an area of potential methane migration, due to proximity of oil fields, and is subject to methane mitigation measures defined in Division 71 of the City's Building Code. With the implementation of Division 71 regulations, the potential for the release of hazardous materials into the environment would be minimal and less than significant. Therefore, no mitigation

measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Educational facilities within one-quarter mile of the Project Site include the Colburn School of Performing Arts, directly across Grand Avenue from Parcels L and M-2. Additionally, a LAUSD high school is being constructed at the north end of the Project's streetscape program, on the east side of Grand Avenue, between Cesar Chavez Avenue and the 101 Freeway. As described under Sections VII (a) and (b) of this Attachment B, the operation of the Project would not generate acutely hazardous materials or wastes. The repair of existing subterranean parking structures in the Civic Mall, or the demolition and removal of the steel structure at 1st Street and Grand Avenue and the removal of asphalt surface parking lots is not anticipated to release asbestos or lead contaminants. No accidental release of hazardous materials, substances, or wastes is reasonably anticipated in relation to the construction or operation of the Project. As such, no exposure of any existing or proposed school within one-quarter mile of the Project Site is anticipated. The impact of the Project in relation to hazardous emissions or the handling of acutely hazardous materials within one-quarter mile of a school would be less than significant. Therefore, no additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

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

Potentially Significant Impact. The Civic Park portion of the Project site has been used as a public park and for vehicle parking for several decades and is not a known industrial site or used for the storage of hazardous materials. Respectively, the Grand Avenue Street right-of-way has been used as street and street frontage bordered by County Buildings, the Los Angeles Music Center, MOCA, vacant lots, and a variety of residential, office and retail uses. This area has not been utilized for industrial purposes or RCRA-listed uses. As such, these sites would not be listed on state or federal hazardous materials databases. The five parcels forming the Project's development sites were formerly occupied by residential or hotel uses and are currently used as surface parking lots and one steel parking structure (Parcel Q). The Environmental Site Assessment performed on Parcels Q, W-2, L, and M-2 indicates that these sites are not listed as state or federal hazardous sites. Nor, according to field surveys, is there evidence of any current or historical use of these parcels for the storage, use, or handling of hazardous materials. In

addition, there is no evidence of the occurrence of soil gas on these parcels.¹¹ Parcel W-1 adjoins W-2 and is also currently used for surface parking. No use or storage of hazardous materials currently occurs on the site. Since this parcel was previously used for residential purposes, as was Parcel W-2, it is not anticipated that any former uses were involved in manufacturing or other industrial activities that resulted in contamination. However, since no Phase I Environmental Site Assessment has been performed for Parcel W-1, the absence of contaminated materials cannot be confirmed. Therefore, the issue of hazardous materials will be further evaluated in an Environmental Impact Report and feasible mitigation measures will be incorporated, as necessary.

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

No Impact. The Project site is not located within an airport land use plan area or within two miles of an airport. In addition, the Project site is not located within an airport hazard area as designated by the City of Los Angeles. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- f. For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for the people residing or working in the area?**

No Impact. There are no private airstrips in the vicinity of the Project site, and the site is not located within a designated airport hazard area. Therefore, the proposed Project would not result in airport-related safety hazards for the people residing or working in the area. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan Framework, Temple, Figueroa, and Alameda Streets are designated disaster routes.¹² Disaster routes function as primary thoroughfares for the movement of emergency response traffic and access to critical facilities. Although the Project site is situated in the vicinity of these streets, it is not anticipated that the construction or operation of the

¹¹ *Iris Environmental, Phase I Environmental Site Assessment, Parcels L, M-2, Q, and W-2 (April 2005)*

¹² *City of Los Angeles Department of Planning General Plan Framework Series, Safety Element – Critical Facilities and Lifeline Systems, April 1995.*

Project would require or result in any modifications to either roadway. Streetscape improvements at Temple Street and Grand Avenue would be on the Grand Avenue frontage and would not impact the Temple Street right-of-way. With the exception of potentially utilizing these streets during construction for movement of construction vehicles, the Project would not intrude upon these roadways. The majority of construction activities for the Project would be confined to the site, except for infrastructure improvements, which would require some work in adjacent street rights-of-way and be performed in accordance with City of Los Angeles requirements, where applicable. Since the Project would not cause the impediment of the City's designated disaster evacuation routes, nor would other elements of the residential and commercial Project impair implementation of the City's emergency response plan, the Project would have a less than significant impact relative to these issues. No further analysis in an Environmental Impact Report, specific to the City's emergency preparedness plan and emergency evacuation, is required.

The potentially significant effects of the construction and operation of the Project on local emergency access are addressed in Section XIII.a. (Fire Protection).

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project site is located in Downtown Los Angeles and is not near or adjacent to any wildlands. As shown in the City of Los Angeles Safety Element, Selected Wildfire Hazard Areas, the Project site is not located near potential wildland fire areas.¹³ Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Thus, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

VIII. HYDROLOGY AND WATER QUALITY. *Would the proposal result in:*

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The existing Project site, consisting of the five development sites, Civic Park, and the Grand Avenue right-of-way, is predominantly impermeable. As such, impermeable surfaces resulting from the development of the Project would not significantly change the volume of storm water runoff from any of these locations. Furthermore, the assumption that on-site permeability would remain largely unchanged with

¹³ *City of Los Angeles General Plan Framework, Safety Element of the General Plan, Exhibit D (November 1996).*

Project development is conservative, as it is anticipated that the landscaped areas proposed by the Project would allow for greater percolation than is currently possible on-site. The Project is not located within close proximity to any bodies of water and operation of the Project would have no direct impact on water quality. During excavation and construction, however, exposed soils could potentially enter storm water runoff. To address the potential for soils and other construction debris from entering storm drainage systems, regulatory and permitting processes have been established to control the water quality of runoff from urban construction sites.

In California, these permits are issued through the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs). The Project Site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The SWRCB has adopted a statewide general construction permit that allows storm water discharge under certain conditions during the construction period but is intended to minimize downstream pollution from construction activities. Prior to grading and construction, the applicant would be required to file a notice of intent with the SWRCB and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs). The SWPPP, which would be consistent with the National Pollution Discharge Elimination System (NPDES) permit, would control wet weather erosion and off-site sedimentation. The SWPPP would be carried out in compliance with the SWRCB, in addition to local requirements. The SWPPP would also be subject to review by the City for compliance with the City of Los Angeles Best Management Practices Handbook for construction and operation. If determined necessary by the City, a Standard Urban Storm Water Mitigation Plan (SUSMP) to address storm water pollution during operation may be required. Due to the increase in parking capacity associated with the Project's residential, retail, hotel, and office uses, City of Los Angeles BMPs, such as detention and treatment of surface water prior to discharge into the public storm drain system, may be required to address surface water quality.

As the proposed Project would replace development that does not benefit from construction in accordance with current regulations, the operation of the Project would likely have a beneficial impact on storm water quality. For example, under existing conditions, the on-site surface parking lots collect urban contaminants, which contribute to pollution to the stormwater runoff without being treated according to current regulations. However, with the development of the proposed Project, BMPs designed to detain and treat potential sources of contamination typically generated by urban uses would be installed and would reduce the discharge of polluted runoff from the Project site. By adhering to the requirements of the City's Development Construction Program and the SUSMP, water quality discharged from the Project Site has the potential to be of higher quality than that which occurs under existing conditions. With the implementation of federal, state, and local clean water requirements, no additional mitigation measures are necessary. No further analysis of this issue in an Environmental Impact Report is required.

- b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?**

No Impact. The Project would not involve any deep excavation that would have the potential to intercept existing aquifers, nor would it involve direct additions or withdrawals of groundwater. In addition, since the Project site is currently almost 100 percent impermeable, the Project would not reduce any existing percolation of surface water into the groundwater table. Project development would not impact groundwater supplies or groundwater recharge. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

Less Than Significant Impact. The existing Project site is almost entirely impermeable. Impermeable surfaces resulting from the development of the Project would not significantly change the volume of storm water runoff or alter the orientation of the runoff to adjacent storm drainage. Furthermore, it is anticipated that the landscaped areas proposed by the Project would allow for greater percolation than is currently possible on-site thereby reducing the volume of storm water runoff leaving the Project site. Although Project construction would temporarily expose on-site soils to surface water runoff, compliance with the required provisions of the SWPPP would eliminate erosion with regard to on- and off-site siltation. During Project operations, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. As alterations to existing drainage patterns within the proposed development sites and surrounding area are not anticipated, existing drainage patterns would be maintained and mitigation measures are not necessary. No further analysis of this issue in an Environmental Impact Report is required.

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?**

Less Than Significant Impact. The Project would utilize the same drainage patterns, as under existing conditions, and would not result in any increases in surface water runoff. Furthermore, it is anticipated that the landscaped areas proposed by the Project would allow for

greater percolation than under current conditions, thereby reducing the rate and amount of surface runoff. Since no increase or direction of water runoff would occur, the Project would not result in an alteration of the course of a stream or river. No substantial increase in the rate or amount of surface water runoff would occur, that would result in flooding on- or off-site. No mitigation measures are necessary and no further analysis of these issues in an Environmental Impact Report is required.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As previously stated in Response VIII.a, the Project would not increase surface water runoff over existing conditions and, thus, runoff after development would not exceed the capacity of existing or planned drainage systems. In addition, with the implementation of the required SWPPP during construction and the SUSMP during Project operations, no substantial additional sources of polluted runoff would occur. No additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

f. Otherwise substantially degrade water quality?

Less than Significant Impact. As previously stated, due to proposed Project activities, an SUSMP would be required to address surface water runoff after Project development. The SUSMP would incorporate BMPs, such as the detention and treatment of surface water prior to discharge into the public storm drain system. With the implementation of BMPs to address surface water quality during construction and during Project operation, the Project would not substantially degrade water quality. No additional mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project site is not located within or near a 100-year flood plain, as indicated on the City of Los Angeles Safety Element 100-Year and 500-year Flood Plains delineation map.¹⁴ Therefore, the Project would not place housing within a 100-year flood plain as mapped on a flood hazard delineation map. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

¹⁴ City of Los Angeles Department of City Planning, *Safety Element of the General Plan, Exhibit F (November 1996)*.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. As stated above in Response VIII.h, the Project site is not located within a delineated 100-year flood plain. Therefore, the Project would not place structures within a 100-year flood plain that would impede or redirect flood flows. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. The Project site is not located within a delineated potential inundation area resulting from the failure of a levee or dam, as shown on the City of Los Angeles Safety Element, Inundation and Tsunami Hazard Areas map.¹⁵ Therefore, the location of the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The Project is not located within Inundation and Tsunami Hazard Areas delineated in the City of Los Angeles Safety Element.¹⁶ The Project site is also not in the vicinity of, or downslope from, a reservoir or storage tank capable of creating a seiche. In addition, the Project site, which is not positioned downslope from any unprotected slopes or landslide areas, is not positioned in an area of potential mudflow. Therefore, no impacts from these events are anticipated. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

¹⁵ *City of Los Angeles General Plan Framework, Safety Element of the General Plan Exhibit G (November 1996).*

¹⁶ *Ibid.*

IX. LAND USE AND PLANNING. *Would the Project:***a. Physically divide an established community?**

Less Than Significant Impact. The Project site is located within the City of Los Angeles' Central Los Angeles Community Plan area. Existing uses (and uses in the area immediately surrounding the Project site) include cultural and entertainment venues, such as the Walt Disney Concert Hall, the Los Angeles Music Center, and MOCA; government offices; and large office buildings. High-rise residential uses in the Grand Promenade Apartments are located immediately west of Parcels L and M-2. The Project is intended to link the surrounding established community with increased pedestrian activity, public participation, and enhanced street and land use interfaces. It is anticipated that the revitalization of the Civic Mall, improved streetscape on Grand Avenue and the introduction of residential uses within a densely commercial center would increase the vitality and pedestrian activity of the area. As such, the Project would bring together, rather than physically divide an established community. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required. Notwithstanding, the Project's Environmental Impact Report will address the Project's land use relationship with adjoining and nearby existing and proposed land uses as part of the analysis of the potential impacts described in Section IX.b.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Civic Mall, located in the City's Central Los Angeles Community Plan area, is designated as a Civic Center land use, which allows government activities on publicly owned land.

All five development sites (Parcels Q, W-1/W-2, L, and M-2) are located in the Central City Community Plan area and the Bunker Hill Urban Renewal Project Area. These parcels are designated Regional Center Commercial, which corresponds to existing R5-4D and C2-4D zones. The -4D designation limits maximum floor area ratio (FAR) to 6:1, except for potential transfers of floor area. Due to the proximity of this area to the Los Angeles Civic Center and Central Business District, the intent of the Bunker Hill Redevelopment Plan is to introduce high-density housing in the existing Bunker Hill neighborhood and to add an active pedestrian and residential element to Downtown Los Angeles. Proposed development would be consistent with the intent of the Bunker Hill Redevelopment Plan.

In order to fully determine consistency of the Project with the City’s General Plan, including the Central City Community Plan, the Los Angeles Municipal Code, CRA’s Bunker Hill Redevelopment Plan, the Bunker Hill Design for Development and the Southern California Association of Governments’ (SCAG) Regional Comprehensive Plan and Guide, further evaluation will be included in an Environmental Impact Report. Feasible mitigation measures will be incorporated, as necessary.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. There are no applicable habitat conservation plan or natural community conservation plan areas adjacent to or near the Project site with which the proposed development would conflict. Therefore, no impacts on any habitat conservation plan or natural community conservation plan would occur. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

X. MINERAL RESOURCES. *Would the Project:*

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

a. and b. No Impact. No known mineral resources, with the exception of oil, are known to occur in the Project vicinity. The Project site is surrounded by several oil fields including the Los Angeles City Oil Field, north of the Project site in the vicinity of Sunset Boulevard and the Hollywood Freeway; the Union Station Oil Field, east of the Project site in the vicinity of Alameda Street; and the Los Angeles Downtown Oil Field south of the Project site in the vicinity of STAPLES Center. The Project site, however, is not located within an oil field or an oil drilling area, as indicated in the City of Los Angeles Safety Element Oil Field and Oil Drilling Area map.¹⁷ Since the Project area is not a designated mineral extraction site or a regionally or locally-important significant mineral resource area, implementation of the Project would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

¹⁷ *City of Los Angeles General Plan Framework, Safety Element of the General Plan, Exhibit E (November 1996).*

XI. NOISE. *Would the Project:*

- a. Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Impact. Existing uses (and uses in the area immediately surrounding the Project site) include cultural and entertainment venues, such as the Walt Disney Concert Hall, the Los Angeles Music Center, and MOCA; government offices; and large office buildings. High-rise residential uses in the Grand Avenue Promenade Apartments are located immediately west of Parcels L and M-2. The Angelus Plaza residential complex for seniors is located on Hill Street, south of Parcel W-1. The Project site is located in the highly urbanized Downtown Los Angeles area and, as such, is exposed to a number of atypical noise sources, including private heliports, overflight of news helicopters, emergency vehicle sirens, and other notable short-term urban noise sources. The Project would introduce new noise sources during Project construction and operations. Construction of the Project would involve the use of earthmoving equipment, heavy trucks, impact devices, derricks, hoists, power tools and other noise generating equipment and activities. Persons occupying certain types of land uses, including residential uses, schools, concert halls, public parks, libraries, museums, churches, hospitals, nursing homes, and auditoriums are more susceptible to increases in ambient noise levels than others.¹⁸ The proposed Project could potentially expose nearby sensitive receptors, including, but not limited to, occupants of the Grande Promenade Apartments, a high-rise residential use located on Grand Avenue on Parcel M-1; visitors to the Walt Disney Concert Hall, the Los Angeles Music Center, and MOCA, located to the east, directly across Grand Avenue from Parcel L; students at the Colburn School of Performing Arts; and other noise-sensitive uses to noise levels during construction that may be above established noise standards. Operational noise associated with the Project would be generated by increased traffic, rooftop equipment, truck operations (e.g., deliveries, trash collection, etc.), and large, outdoor public gatherings in Civic Park. The impact of the Project relative to the exposure of persons and the generation of noise levels in excess of established standards could be potentially significant. In order to determine the impact of the Project in relation to existing noise standards, this issue will be evaluated in an Environmental Impact Report. Existing noise levels will be measured and compared to projected noise levels, from all Project sources, to identify potential impacts. Feasible mitigation measures for the construction and operation phase of the Project will be proposed, as necessary.

¹⁸ L.A. CEQA Thresholds Guide, City of Los Angeles, page I.1-3, May 14, 1998.

b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The Project could result in groundborne-related construction noise and vibration impacts since a typical construction technique for the development of high-rise buildings includes pile driving. Construction activities, such as pile driving, may cause groundborne noise or vibration. Similar types of impacts are not anticipated during the Project's operational phase as activities that generate groundborne noise or vibration are not anticipated to occur. Since potentially significant groundborne vibration during the Project's construction phase could occur, this issue will be evaluated and documented in an Environmental Impact Report. Feasible mitigation measures addressing groundborne vibration will be proposed, as necessary.

c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Potentially Significant Impact. The implementation of the Project could permanently increase ambient noise levels in the area during Project operation due to increased vehicle traffic and pedestrian activity. In addition, on-site activities, including activities in the outdoor areas, as well as stationary equipment associated with the Project's residential, retail, hotel and office uses, have the potential to permanently increase area noise levels. Since potentially significant ambient noise increase may occur during the Project's operation phase, this issue will be evaluated and documented in an Environmental Impact Report. Feasible mitigation measures will be proposed, as necessary.

d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?

Potentially Significant Impact. Construction related activities and equipment used during the Project's construction phase could result in a temporary or periodic increases in ambient noise levels above existing levels. During the operational phase, increased traffic could also result in temporary or periodic increases in ambient noise levels. The proposed high-rise structures will be required to provide helipads for emergency evacuation. The area is characterized by atypical noise sources, including private heliports, overflight of news helicopters, emergency vehicle sirens, and other notable short-term urban noise sources. Since the Project could result in temporary or periodic increases in noise levels, these increases will be evaluated in an Environmental Impact Report and feasible mitigation will be proposed, as necessary.

- e. **For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?**

No Impact. The Project site is not located within an airport land use plan area or within two miles of a public airport or public-use airport. Therefore, the Project would not expose people to excessive airport-related noise levels. No further analysis of this issue in an Environmental Impact Report is required.

- f. **For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?**

No Impact. There are no private airstrips in the vicinity of the Project site. No further analysis of this issue in an Environmental Impact Report is required.

XII. POPULATION AND HOUSING. *Would the Project:*

- a. **Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Potentially Significant Impact. The Project is located within the City's Central Los Angeles Community Planning Area and the Central Los Angeles Planning District. The Central District is comprised of the Central City, Central City North, Hollywood, Westlake, and Wilshire Communities. The total Projected 2004 population for the Central District and the various Community Plan areas is summarized in Table B-1 on page B-29.

As shown in Table B-1, the total population of the Central District is 702,900. Of the five community plan areas, the Central Los Angeles Community has the lowest residential population. Since this area of the City contains the Los Angeles Civic Center and the jobs-rich Central Business District, the low population indicates that, in the balance between jobs and housing, the Community Plan area would have more jobs than residential units. The Central Los Angeles Community also has the lowest number of residents per housing unit, reflecting the small family size of the residential population. Since many of the new residential units in Downtown Los Angeles are converted lofts and high-rise dwellings, they generally attract smaller families.

Table B-1

**ESTIMATED 2004 HOUSEHOLD POPULATION
LOS ANGELES CENTRAL AREA PLANNING COMMISSION DISTRICT**

Community:	Population:	Residential Population in Multi-Family Units:	Occupied Multi- Family Units:	Residents per Multi- Family Unit:
Central City	27,090	18,060	11,580	1.56
Central City North	28,640	15,010	4,740	3.16
Hollywood	222,690	169,050	76,460	2.21
Westlake	114,270	101,500	31,950	3.18
Wilshire	<u>310,230</u>	<u>257,680</u>	<u>101,170</u>	<u>2.54</u>
Total:	702,900	560,800	225,900	2.48

The Project would develop up to of 2,060 multi-family residential units. The significance of the population increase resulting from this development, as well as the relationship of the Project with the applicable policies of the City's General Plan Housing Element and SCAG's RCPG, will be further evaluated in an Environmental Impact Report and feasible mitigations will be incorporated, as necessary.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

No Impact. No existing residences are located within the Project site and, as such, development of the Project would not displace any existing residences. Instead, the Project would add to the City's housing supply. Therefore, no impacts associated with the displacement of a substantial number of existing housing units would occur. No further analysis of this issue in an Environmental Impact Report is required.

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact. The Project site does not currently contain any residential uses. Project implementation would not displace any residents but, rather, would provide new housing. Therefore, no impacts associated with the displacement of substantial numbers of people, necessitating the construction of replacement housing would occur. No further analysis of this issue in an Environmental Impact Report is required.

XIII. PUBLIC SERVICES. *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to*

maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection?

Potentially Significant Impact. Fire protection and emergency medical service to the Project site is provided by the Los Angeles Fire Department (LAFD). LAFD personnel and emergency medical technicians respond to incidents requiring fire protection and emergency medical care. The Project site is located less than one mile from Fire Station No. 3, which is located at 108 North Fremont Avenue. In addition to increasing public use of Civic Park, the Project would develop new residential, retail, hotel and office uses on five development sites. The Project would also include streetscape improvements along both sides of Grand Avenue, between Cesar Chavez Avenue and 5th Street. The addition of residents, patrons, and employees to the area may create the need for additional fire protection and emergency medical services. In addition, due to the magnitude and geographic extent of the Project, potentially significant impacts relative to emergency access could occur. As the Project would intensify development and change existing land uses, further analysis of potential impacts associated with fire protection will be included in an Environmental Impact Report and feasible mitigation measures will be incorporated, as necessary.

b. Police Protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection to the Project area. The Project site is located within the Central Community Police Station service area that encompasses roughly 4.5 square miles and has a population of approximately 40,000 people. This facility is located approximately one mile from the Project site at 251 East 6th Street. The Central Community Police Station is responsible for all police operations in Downtown Los Angeles including the Central City East, Historic Core, South Park, Financial District, Fashion District, Artists Lofts, Chinatown, Olvera Street, Jewelry District, and Little Tokyo communities as well as the Convention Center. The Project would increase patronage and introduce larger numbers of visitors to Downtown Los Angeles with the revitalization of Civic Park. In addition, five development sites currently being used for parking would be developed with up to 2,060 residential units, up to 479,500 square feet of retail uses, approximately 225 hotel rooms and up to 600,000 square feet of office uses. The addition of residents, patrons, and employees to the area may create the need for additional police protection. As the Project would intensify development and change existing land uses, further analysis of potential impacts associated with police protection will be included in an Environmental Impact Report and feasible mitigation measures will be incorporated, as necessary.

c. Schools?

Potentially Significant Impact. The Los Angeles Unified School District (LAUSD) provides public education for grades K-12 in the Project area, which is located within LAUSD District 4. School service needs are related to the size of the residential population, the geographic area served, and community characteristics. The Project would introduce a maximum of up to 2,000 additional residential units, and that some of the new residents may be school-age children. As part of the LAUSD's New School Construction Program, additions to several existing schools and the construction of new schools are planned within District 4. Given that the Project would generate new students that may not be anticipated by the current building program, the impact of the Project on local schools may be potentially significant. Therefore, this issue will be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

d. Parks?

Potentially Significant Impact. The Los Angeles Department of Recreation and Parks is responsible for the operation of public parks and recreational facilities within the City of Los Angeles. Facilities within a two-mile radius of the Project site are considered to be within a reasonable walking or travel distance. The Project, which proposes the redevelopment of 16 acres of parks, would also generate a potential population increase attributable to the Project's residents as well as employees associated with the Project's commercial uses. The impact of this population increase on local parks could be potentially significant. Therefore, this issue will be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

e. Other governmental services (including roads)?

Potentially Significant Impact. Other public facilities available to future residents of the Project include libraries, roads, transit, utility systems including water and sewer infrastructure, as well as other general public facilities. Please refer to Section XV, Transportation/Circulation, of this Initial Study for a discussion of traffic and transit impacts and to Section XVI, Utility Systems, for a discussion of impacts on public utility infrastructure.

By introducing new residents, the Project would increase the demand for library services within the City of Los Angeles Public Library system. The Project site would be primarily served by the Central Library, located on Fifth Street at Grand Avenue, 2.5 blocks to the south of the Project site. The estimated population increase introduced by the Project may have a significant impact on the capacities of these existing library facilities. Therefore, this issue will

be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

Although the Project would also create increased demand on the existing road network, no new public roads or highways would be needed to service the Project. As Project operations would not result in unusual levels of demand, Project operation would not result in an undue burden with regard to street maintenance and construction. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

XIV. RECREATION

- a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Potentially Significant Impact. As previously discussed in section XIII.d, Parks, the increased demand on parks and recreational facilities generated by the Project could result in a potentially significant impact. In addition, during construction of the Civic Park, existing park facilities within this location would be unavailable or partially available to the public for recreational use. Therefore, this issue will be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

- b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Potentially Significant Impact. The Project is anticipated to include on-site active and passive recreational opportunities. These amenities would be constructed as part of the implementation of the Project. In addition, as discussed in Response XIV.a, above, the Project would result in new residents in the Central City area, which may result in the need for the construction or expansion of existing recreational facilities that may have an adverse physical effect on the environment. Therefore, this issue will be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

XV. TRANSPORTATION/CIRCULATION. *Would the Project:*

- a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?**

Potentially Significant Impact. The proposed Project would result in an increase in the intensity of on-site development and a change in land use compared to existing on-site uses. Therefore, the Project could result in an increase in the number of vehicle trips attributable to the Project site. Construction activities would generate traffic associated with construction employees, movement of equipment, and hauling. In addition, construction would potentially cause partial or complete lane closures for street and sidewalk improvements, installation of utilities, and haul truck staging or merging into traffic lanes. As such, the Project could result in potentially significant traffic impacts. As there is a potential for the Project to result in a significant traffic impact, a traffic study, conducted in accordance with Los Angeles Department of Transportation (LADOT) requirements, will be prepared and incorporated into an Environmental Impact Report. The Project's traffic analysis will identify the intersections for analysis, quantify existing and future traffic conditions at those locations, identify impacts caused by the addition of Project-generated traffic, and identify mitigation measures to reduce any potentially significant impacts generated by the Project, as appropriate and where feasible.

- b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

Potentially Significant Impact. The Metropolitan Transportation Authority (MTA) administers the Congestion Management Plan (CMP), a state-mandated program designed to address the impact urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project (STIP). The CMP guidelines specify that all freeway segments where a Project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP roadway intersections where a Project could add 50 or more trips during either peak hour. The change in land use and the increased intensity of the use of the Project site would result in an increase in the number of vehicle trips that may exceed the established CMP thresholds. Therefore, this issue will be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The closest major airport to the Project site is the Los Angeles International Airport, which is located approximately 12 miles southwest of the Project site. Based on the facility's airport land use plan, the Project site is not located within the Planning Boundary of the Los Angeles International Airport. The Project does not propose any uses that would increase the frequency of air traffic or alter air traffic patterns. In addition, the proposed heights of the Project's towers would not exceed the height of the nearby high-rises in the Los Angeles Financial District. As these existing towers do not interfere with air traffic patterns, the proposed high-rise structures associated with the Project would also not interfere with air traffic patterns. The Project would also comply with applicable Federal Aviation Administration regulations regarding lighting. As such, safety risks associated with a change in air traffic patterns would not occur, and no further analysis of this issue in an Environmental Impact Report is required.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. There are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the Project vicinity. The Project does not include the creation of any such design hazards nor include any uses that are incompatible with normal traffic operations. The Project would not substantially increase hazards, and no further analysis of this issue in an Environmental Impact Report is required.

e. Result in inadequate emergency access?

Less than Significant Impact. Adequate emergency access to the site would be available via major adjoining streets. In addition, the Project would not impede emergency access to any adjacent or surrounding properties during construction or operation. The Project would comply with applicable City of Los Angeles Fire Department codes for emergency vehicle access to high-rise residential development. To the extent possible, construction activities would be confined to the site with only limited, temporary obstruction of portions of the adjoining roadways in accordance with City of Los Angeles regulations for temporary closures of streets and sidewalks. As such, the Project would result in a less than significant impact with respect to emergency access, and no further analysis of this issue in an Environmental Impact Report is required.

f. Result in inadequate parking capacity?

Potentially Significant Impact. Parking for the proposed Project would be provided on site within enclosed podium or subterranean parking structures. Due to the scope of the Project and its potential demand for parking, as well as the removal of existing parking facilities, the issue of parking adequacy will be evaluated in an Environmental Impact Report and feasible mitigation measures will be recommended, as necessary.

g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less than Significant Impact. The proposed Project supports, rather than conflicts, with adopted policies, plans and programs supporting alternative transportation since it places residential development in close proximity to mass transit and local shuttles. The Project would also locate development within a major regional employment center, which further serve alternative transportation by enabling residents to bicycle or walk to work. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

XVI. UTILITIES AND SERVICE SYSTEMS**a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Less than Significant Impact. Wastewater treatment services would be provided to the Project by the City of Los Angeles Department of Public Works. Any wastewater generated by the site would be treated at the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgpd) in accordance with all applicable Regional Water Quality Control Board requirements. City Ordinance No. 166,060 limits the annual increase in wastewater flow to the Hyperion Treatment Plant to 5 mgpd. Currently there is an unutilized capacity of 119 mgd at the HTP. Based on its current Projections through the year 2010, it is forecasted that the HTP would be able to meet future needs. This forecast is based in part on a 23 percent growth in the size of the DWP's service population, or approximately one percent growth per year, which is derived from SCAG data. The Project would generate demand for wastewater services for a maximum of 2,060 new residential units, an approximately 225-room hotel, up to 479,500 square feet of new retail uses, and up to 600,000 square feet of office space. Compliance with the established monthly allocation set forth in City Ordinance No. 166,060 must be determined prior to the City's issuance of a building permit for the Project. Thus, the Project would not be able to connect to the City's wastewater system until capacity is available

and a sewer permit issued. Therefore, impacts on existing wastewater treatment requirements would be less than significant, and no mitigation measures are required. No further analysis of this issue in an Environmental Impact Report is required.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Water and sewer systems consist of two components, the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site(s). An analysis of potential impacts with regard to water and sewer conveyance systems is provided below, whereas an analysis of water supply is provided below in Section XVI.d, while the analysis of wastewater treatment capacity is provided in Section XVI.e. Local wastewater treatment facilities, including local lines and mains, are operated by the City of Los Angeles Bureau of Sanitation. Wastewater generated by the Project would flow to the Hyperion Treatment Plant. With the Projected growth initiated by the Project, potentially significant impacts associated with conveyance facilities could occur. Sewer lines between the Project site and the Hyperion Treatment Plant, particularly those adjoining the various development sites, may need to be upgraded to handle the sewage flows generated by the Project. Improvements to the water system may also be required if insufficient capacity to serve the proposed Project exists. If construction of new conveyance facilities were required, the Project would have a potentially significant impact on wastewater facilities. This issue will be evaluated and analyzed in an Environmental Impact Report and feasible mitigation measures will be provided, as necessary.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. The existing Project site is almost 100 percent impermeable. With development, surface water runoff and demand on the existing stormwater drainage facilities would not change. Furthermore, it is anticipated that the Project as proposed would increase the amount of landscaped areas allowing for greater percolation than under existing conditions. Thus, this likely increased permeability would effectively reduce the volume of runoff. It is also anticipated that the existing storm drains have adequate capacity to absorb the existing storm water runoff from the site, as well as storm water pipes and connections linking the Project to the regional conveyance system. Therefore, no mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report is required.

d. Have sufficient water supplies available to serve the Project from existing entitlements and resource, or are new or expanded entitlements needed?

Potentially Significant Impact. Water supply would be provided to the Project site by the City of Los Angeles Department of Water and Power (DWP). The Project's level of development requires the preparation of a Water Supply Assessment by the DWP pursuant to California Water Code Sections 10910-10912. Given the need to prepare such an assessment of whether the Project's water demand may exceed DWP's projected supply and, thereby, cause a potentially significant impact on DWP's water supplies, the issue of water demand will be evaluated and documented in an Environmental Impact Report and feasible mitigation measures will be provided, as necessary.

e. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. In 1990, City Ordinance No. 166,060 (also known as the Sewer Allocation Ordinance) was adopted, which established regulations for projects that discharge into the Hyperion Treatment System (HTS). The ordinance established an annual sewage allotment of 5 million gallons per day (gpd), of which 34.5 percent (1,725,000 gpd) is allocated for priority projects, 8 percent (400,000 gpd) for public benefit projects, and 57.5 percent (2,875,000 gpd, with a monthly allotment of at least 239,583 gpd) for non-priority projects (of which 65 percent of this allocation is for residential and 35 percent for non-residential projects). As such, capacity is currently available within the HTS. In addition, the City will only issue a building permit if the Project's increase in wastewater generation is within HTP's monthly allocation. Therefore, the Project would not be able to connect to the City's wastewater system until capacity is available and a sewer permit issued. Therefore, impacts on existing wastewater treatment capacities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an Environmental Impact Report is required.

f. Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?

Potentially Significant Impact. Residential and commercial uses in the City of Los Angeles generate approximately 9.1 million tons of solid waste per year.¹⁹ Various public agencies and private companies provide solid waste management services in the City of Los Angeles. The City of Los Angeles Bureau of Sanitation collects the majority of residential waste

¹⁹ *City of Los Angeles Department of Public Works, Bureau of Sanitation, AB 939 2000 Annual Report, Section 4, Waste Generation and Diversion Rate*

from single-family and some smaller multi-family residences. Private collectors service most multi-family Projects and all commercial developments. As the Project would include both high-density residential development and commercial uses, solid waste would be collected and transported by a private contractor. Site-generated solid waste would be disposed of at landfills that accept municipal solid waste.

Based on the solid waste generation factor of 12.23 pounds of solid waste per household, the Project's maximum 2,060 dwelling units would generate an estimated 12.23 tons of solid waste per day.²⁰ In addition retail, hotel, office, and restaurant uses would generate solid waste, factored on number of employees and uses. Although the Project's solid waste would represent a small percentage of the daily solid waste generated in the City of Los Angeles, the effects of the percentage increase could be potentially significant. Therefore, the issue of solid waste capacity will be evaluated and documented in an Environmental Impact Report and feasible mitigation measures will be provided, as necessary.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. Solid waste management is guided by the California Integrated Waste Management Act of 1989 that emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles has also prepared a Solid Waste Management Policy Plan, adopted by the City Council in 1994. The Project would be required to comply with the City's Solid Waste Management Policy Plan and Framework Element of the General Plan, in addition to applicable Federal and State regulations associated with solid waste. Furthermore, the California Solid Waste Reuse and Recycling Act of 1991 requires development Projects to provide adequate storage areas for the collection and removal of recyclable materials. Recycling collection facilities for residents would be included as part of the Project. Since the Project would comply with Federal, State, and local statutes and regulations related to solid waste, no further analysis of this issue in an Environmental Impact Report is required.

h. Other Utilities and Service Systems?

Less Than Significant Impact. The Project site has electricity services provided by the City of Los Angeles Department of Water and Power. LADWP owns its own electrical power generation plant and, as such, electrical service within the LADWP service area has not been affected by the recent statewide energy shortage. LADWP is projected to have an annual

²⁰ *City of Los Angeles CEQA Threshold Guide, Solid Waste Generation Factors, page K.3-2.*

demand of 26,906,000 MWh in 2010.²¹ Natural gas would be provided to the Project site by the Southern California Gas Company (SCGC). SCGC has a Projected annual demand of 883,400 million cubic feet in 2010, within the entire SCGC service area. The demand of the Project's maximum of up to 2,060 residential units, an approximately 225-room hotel, up to 479,500 square feet of retail and restaurant uses, and up to 600,000 square feet of office space would increase demand on electricity and natural gas facilities compared to existing conditions. The Project would fall within the projected energy demands of the LADWP and SCGC. Therefore, impacts would be less than significant and no further analysis of this issue in an Environmental Impact Report is required.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

- a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to aesthetics; air quality; historical resources; noise; land use; population, housing and employment; public services; recreation; traffic; and utilities. While the Project is anticipated to be consistent with local and regional plans, land use will also be analyzed in the Environmental Impact Report. Therefore, the potential to degrade the quality of the environment will be addressed in an Environmental Impact Report.

The proposed Project will not result in a substantial reduction in the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. No further analysis of these issues in an Environmental Impact Report is required.

²¹ *California Energy Commission*. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.

- b. Does the Project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project site resulting in impacts that are greater than the impacts of the Project alone.

Located within the vicinity of the Project site are other past, current and/or probable future Projects, whose development, in conjunction with that of the proposed Project, may contribute to potential significant cumulative impacts. In evaluating the potential for cumulative impacts, environmental issues can be grouped together, to a certain extent, based on the nature of the potential impacts. Some aspects of the Project have been identified as having the potential for significant environmental impacts and their associated potential cumulative impacts will be analyzed and documented in an Environmental Impact Report. Therefore, the potential for cumulative impacts related to aesthetics; air quality; historical resources; hazardous materials, noise; land use; population, housing and employment; public services; recreation; traffic; and utilities resulting from the Project in conjunction with related Projects will be analyzed and documented in an Environmental Impact Report.

The potential for significant cumulative impacts for the other environmental issues that are not to be evaluated and documented in the Environmental Impact Report can be assessed. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the Project would have no contributory impact. Environmental issues meeting this criterion include agricultural resources and mineral resources.

With respect to the other environmental issues that will not be evaluated in the EIR, the Project site is located in an urbanized area. While other projects may occur in the Project area, such developments would largely occur on previously disturbed land and are not anticipated to impact biological resources. Thus, no cumulative impact to biological resources would occur. Compliance with state and federal water quality regulations implemented by the Regional Water Quality Control Board (RWQCB) through project-specific National Pollutant Discharge Elimination (NPDES) Permits and by the City through Storm Water Pollution Prevention Plans (SWPPPs) and Standard Urban Stormwater Mitigation Plans (SUSMPs) would reduce any cumulative impacts associated with hydrology and water quality to less than significant levels.

Impacts associated with geologic and seismic issues are typically confined to a project site or a very localized area and do not affect off-site areas associated with the related Projects or

ambient growth. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. However, all projects are subject to established guidelines and regulations pertaining to seismic hazards. As such, compliance with applicable state and City regulations would preclude significant cumulative impacts with regard to geology and soils.

Therefore, only those aspects of the Project to be analyzed and documented in the Environmental Impact Report are concluded to have the potential for significant cumulative impacts.

c. Does the Project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Construction and operation of the proposed Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. These potential effects could be associated with aesthetics; air quality; hazardous materials; historical resources; noise; population, housing and employment; public services; recreation; traffic; and utilities. These potential impacts will be analyzed further in an Environmental Impact Report. In addition, while the Project is anticipated to be consistent with local and regional plans, land use issues will also be analyzed in the Environmental Impact Report.



APPENDIX A-3

SCOPING MEETING TRANSCRIPT

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The Los Angeles Grand Avenue Authority

Open House and Scoping Meeting

Transcript of Proceedings

Tuesday, September 20, 2005

Cathedral of Our Lady of the Angels
555 West Temple Street, Los Angeles, California 90012

NOP Scoping Meeting.txt
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12	COMMUNITY SPEAKERS	
13	Mr. Dave Bowen	25
14	Mr. Tut Hayes	27
15	Mr. Brady Westwater	30
16	Ms. Lois Thompson	32
17	Mr. Jay German	34
18	Ms. Cassandra Elliot	36
19	Mr. Joe Clifford	37
20	Mr. Allen Leslein	38
21	Mr. Shiraz Tareri	40
22	Mr. Jim Colligan	41
23	Ms. Kathryn Hargreaves	44
24	Mr. Tim Quinn	45
25		

1 Los Angeles, California Tuesday, September 20, 2005

2 6:27 p.m.

3

4

--oo0oo--

5

6 MS. WELBORNE: Good evening, everybody. Is this
7 on? Okay, Reggie. Is that working yet? Loud and
8 clear. Okay.

9 All right. Good evening. My name is Martha
10 Welborne. I'm the managing director of the Grand
11 Avenue Committee. And I'm here to welcome you to this
12 meeting and to introduce a few people, and first of
13 all, describe the purpose of the meeting.

14 I assume all of you are here because you saw
15 notices, so you probably know what the purpose is. But
16 I just wanted to repeat what it is.

17 We are beginning -- for the Grand Avenue
18 Project, we are beginning the environmental review
19 process. And before we undertake that process, we need
20 to make sure that we know what everyone thinks should
21 be studied in the EIR.

22 This is a procedural part of CEQA that we
23 have an open meeting like this and listen to
24 everybody's opinion about what we study. So tonight is
25 not a community outreach meeting that we've had many

3

1 of. It is not that per se. You will still learn a lot
2 about the project if you haven't been to one of our
3 outreach meetings before.

4 But the real purpose tonight is for us to

5 hear from you and to write down what you think is of
6 importance to study in the environmental work.

7 There are several ways you can tell us what
8 you think. One is to speak tonight. Another one is to
9 send us your comments either by e-mail or by regular
10 mail. October 10th is the deadline for all comments.

11 And for your comments, if you want to send
12 them in, in writing, there's a response form that they
13 have out at the front desk.

14 And if you want to speak tonight, we would
15 appreciate it if you'd fill out one of these speaker
16 cards so that -- someone in the back will then bring
17 them up to us at the front. And we'll call on you one
18 by one to make sure that we hear from everybody.

19 Let me give you just a little bit of
20 background on -- on the project and the sort of
21 structure of the project.

22 The Joint Powers Authority, which is called
23 the Los Angeles Grand Avenue Authority, is the lead
24 agency for this project. And the Grand Avenue
25 Committee, which I am the managing director of, acts as

4

1 the staff to the J.P.A.

2 We, in turn, have hired a consulting firm
3 that specializes in environmental review. That firm is
4 PCR Services. And Bruce Lackow, who's here to my
5 right, is here today; and, in fact, he will be speaking
6 to you and run you through a basic CEQA process

7 analysis.

8 We also work closely with The Related
9 Companies who have been selected. Over a year ago they
10 were selected as the developer for the project -- for
11 the Grand Avenue Project. And Doug Gardner is here in
12 the front row today from Related, and he will be
13 describing the project to you in just a minute.

14 So the process for the evening will be that
15 we will begin with two presentations. Doug's first,
16 giving you an overview of the project using the Power
17 Point slides here. And then Bruce will follow-up and
18 go through a CEQA description.

19 After that, we'd like to turn it over to
20 those who would like to speak tonight. And please fill
21 out the speaker card so that we know who you are. And
22 those of you who don't want to speak tonight -- if you
23 don't want to speak tonight, that's fine. You can send
24 us in your comments in another way.

25 And we will then call you up to speak, and we

5

1 will turn these microphones around so that you can
2 stand at a mic and address everyone.

3 We also have -- as is typical, we have a
4 court reporter here tonight to make sure we record
5 accurately what everyone says.

6 I think we're going to -- because it is
7 basically a public hearing, we are going to have a time
8 clock on for speakers. But we're going to keep it at

9 three minutes, which is actually quite a lot of time.
10 So you'll see -- for those of you who are speaking,
11 you'll see on the screen sort of a three-minute
12 countdown.

13 With that, I would like to turn and introduce
14 Doug Gardner with The Related Companies, the project
15 executive for Related who will walk you through what
16 the project components are.

17 MR. GARDNER: Thank you, Martha.

18 As Martha mentioned, I'm with The Related
19 Companies, the developer -- selected developer for this
20 project. Martha has asked that I be very brief, very
21 succinct, and keep my salesmanship to a minimum, which
22 is very difficult for a developer. So I will do my
23 best.

24 Before we begin with the slides, I just want
25 to say a few things. Particularly, as Martha

6

1 mentioned, this is -- we've had a very extensive public
2 process really beginning last fall of '04 and right up
3 to today but specifically through May 23rd when the
4 concept plan you're going to see tonight was approved
5 by the Joint Powers Authority.

6 It was subsequently approved by the Community
7 Redevelopment Agency; the City Council; and just
8 recently last month, August 9th, by the Board of
9 Supervisors. So it was only on that date, August 9th,
10 that we were officially designated the developer.

11 And I say that because I see some familiar
12 faces from our previous meetings and from our May
13 meetings. And I just want to let you know what you're
14 seeing tonight is that concept plan.

15 It's not that we've been sitting still since
16 then. We've been doing a lot of other preparations to
17 launch this project: Surveys, site assessments,
18 programming, getting our design team set up.

19 But this is not a presentation of glorious,
20 new, elaborate plans. This is the basic concept scheme
21 that is the -- will be the essence of the environmental
22 impact report that will be prepared.

23 So with that brief introduction, I'm going to
24 run through about a dozen slides and just try to give
25 you an overview of what this project is about. Next

7

1 slide, please.

2 Just to orient you, here's Bunker Hill, the
3 high-rises. City Hall is here. Grand Avenue is here,
4 and First Street is here. And the project, as it's
5 defined, consists of these reddish parcels, which are
6 the development sites, the Civic Park, which is the
7 mall -- 16-acre mall, and Grand Avenue itself, which
8 stretches from Cesar Chavez to Fifth Street. Next
9 slide.

10 And looking down on top, you can see a little
11 bit better the mall itself. The development parcels --
12 these two are actually owned by the city of L.A.

13 Q and W-2 are owned by the County of L. A.
14 W-1 is in private ownership. And Related intends to
15 acquire that.

16 So this constitutes the overall project that
17 we are going to be pursuing. Next slide.

18 Our mission is to create a new downtown
19 entertainment/shopping center, a great urban park, a
20 new residential district, a great contribution to
21 affordable housing, and park and public improvements
22 funded by the project itself.

23 And I just want to emphasize that one second.
24 This is a very interesting example of a much -- a new
25 trend, a relatively new trend, which is public/private

8

1 partnerships. In essence, the money generated by this
2 project through ground leases paid by the developer,
3 and tax increment generated by the project basically
4 pay for the civic improvements that go with the
5 project, particularly, the renovation of the park and
6 improvements on Grand Avenue. Next slide.

7 This is the base concept plan approved last
8 May. And I'm going to not talk about this too much
9 because I have some more details. But, essentially,
10 here are the development sites. And I will come back
11 to them. There is Disney Concert Hall. This is the
12 Music Center. And City Hall is here. And this, of
13 course, is the Civic Park. I will come back to a
14 version of this slide. Next slide, please.

15 I'm going to focus on the park. And very
16 briefly -- and, again, I feel like I want to talk more,
17 but I'll be very brief. Many of you know this park
18 today. Many of you have no idea this park is even
19 here.

20 It's a 16-acre mall. People who go and serve
21 jury duty, if there's any time, you can wander out.
22 And that space you wander into is the park. It's not a
23 bad space, but it has several deficiencies that we want
24 to correct -- that we've been assigned to correct. And
25 additionally, we need to make this a great space for

9

1 the use of all Angelenos.

2 And our plan just very briefly calls for
3 improvements up on Grand Avenue. Those big helical
4 ramps that kind of block access into the park, we have
5 a proposal to replace that with some more modest ramps
6 each side and create a new plaza up at Grand Avenue and
7 a series of cascading terraces which make a nicer
8 transition from the street down into the park.

9 And then a series of spaces which are used
10 for different things, whether large lawns for cultural
11 entertainments, concerts, symphonies, movies. Smaller,
12 more intimate gardens here. And, finally, down by City
13 Hall, where there's a parking lot today, make a great
14 civic plaza for festivals, inaugurations, that type of
15 thing. Next slide.

16 And very briefly, this is a section -- just

17 to remind you, it's a pretty steep slope. And the idea
18 is to create some changes in elevation through terraces
19 or steps and then more level places upon which we can
20 actually have these events occur. Next slide.

21 And, again, the goal is to create something
22 that is for great city-wide events in which the whole
23 park can be utilized. This particular slide is One
24 Millennium Park in Chicago, which is a very interesting
25 model. Next slide.

10

1 But, also, much more intimate day-to-day
2 uses, whether it's cafes or reading or playgrounds or a
3 civic garden -- that type of thing.

4 So it's very important that this park be able
5 to accommodate a lot of different types of activities.
6 Without those activities, without the infrastructure
7 for that, it will just be a pretty space that's empty.
8 And we do not want that. Next slide.

9 So here, looking at another view of the
10 model, you're looking at City Hall up the stretch of
11 the park to the Music Center. And you can see the
12 types of spaces. And, also, now I'm going to move to
13 the development site itself.

14 You see Disney Concert Hall right here. And
15 what you see are an array of buildings from this angle,
16 approximately six high-rise buildings, most of them
17 built to be slender, which constitute the development
18 proposal. Next slide, please.

NOP Scoping Meeting.txt
Again, Grand Avenue, First Street, Disney

19
20 Concert Hall. In this drawing these brownish shapes
21 are tall -- taller buildings from 20 stories to about
22 45 stories, primarily residential. One, two, three,
23 four, five residential buildings and one potential
24 office building, which could be a government office
25 building. This master plan -- I'm sorry. Let me go

11

1 back one second.

2 In addition, these lower objects you see
3 here, the green and the blue, are much lower-scale
4 elements. Two, three, four stories -- retail, civic,
5 cultural uses. And the orange represents a pedestrian
6 plaza, which, by intent, does not simply go around the
7 site but actually engages the site with connections
8 down to First Street across Olive -- into the second
9 development site with connections back down to the
10 historic core and, importantly, to the transit stop
11 which occurs on this part of the property.

12 So it's a mix of these three elements:
13 Plaza -- public plaza; tall slender buildings, slender
14 in order to allow sunlight into the spaces; and
15 pedestrian-scaled retail and cultural buildings at the
16 plaza level which form the basis of the design.

17 Oh, and -- I'm sorry. The total bulk of
18 development which will be studied in the environmental
19 impact report is approximately 3.6 million square feet
20 which consists of approximately 1900 residential units,

21 20 percent of them affordable; 600,000 square feet of
22 potential office in this site here; 350 to 400,000
23 square feet of retail; and up to 275 hotel rooms, in
24 addition to the parking which is primarily below grade
25 to serve as uses. Next slide, please.

12

1 This is just a diagram of the first phase of
2 the project. I'm sorry. Can you go back one second.
3 I should have pointed out. May be too much trouble.
4 Thank you.

5 This site here, this -- we're highlighting
6 the first phase of this development, which is this
7 piece right here, which is a 50-story tower of
8 residential and hotel, second residential hotel --
9 second residential tower, and approximately 250,000
10 square feet of retail.

11 This first phase must begin construction by
12 the end of next year. It should be built out by late
13 2009. And the improvements to the park, which I
14 described, also have to be completed as part of the
15 first phase. That's part of the deal that was
16 negotiated. Next slide.

17 Just a quick look at that first phase. The
18 white -- are pieces of the building as they hit the
19 ground whether it's shops or the hotel. The plaza
20 area, green and the red, represent the public
21 thoroughfare through the site, giving access to retail
22 and the connections to the street. Next slide.

23 And the intent is -- as you go up and these
24 are higher floors, maybe up to the fifth floor or so --
25 the taller buildings emerge, but we evolved a series of

13

1 terraces and gardens. Again, the idea being to make
2 this something that takes advantage of our wonderful
3 climate -- less so today -- but, in general, wonderful
4 climate. And it'll be about Los Angeles. Next slide.

5 And, also, as you move down into the site
6 because, again, there's a very steep slope, as you
7 know, on First and Second, part of the building kind of
8 disappears into the hillside which will be parking but
9 the edges that front on the streets will also have
10 uses, particularly, retail uses and lobbies, et cetera.
11 Next slide.

12 And, in fact, this is all the way down on
13 Olive Street with the main vehicular entrance and our
14 plans call for a 40 to 50,000 square foot market that
15 actually has its front doors on Olive, but can be
16 entered from above as well. Next slide.

17 So that is the overview, brief as it is, for
18 a complicated project.

19 Just to summarize: Disney Concert Hall --
20 we're now looking the other way towards City Hall. You
21 can see the array of these taller buildings which step
22 back and provide smaller scale buildings adjacent to
23 Disney Concert Hall; and the pedestrian path that wind
24 through the site and down around the site; and, of

25 course, the stretch of the park all the way from the

14

1 Music Center down to City Hall.

2 The final thing I'll say is that the vision
3 for this property, as you could maybe glean a little
4 from these images, is to do something that is flexible;
5 that is spirited; that is about Los Angeles, not
6 necessarily something rigidly carved into a city grid
7 but something that is quite animated, exciting,
8 flexible, and can adapt itself over time to the city.

9 So with that I'm going to return -- I'll turn
10 over to Bruce Lackow who will talk about the
11 environmental review process.

12 MR. LACKOW: Next slide, please.

13 Good evening. My name is Bruce Lackow, and
14 I'm a principal with the firm PCR Services Corporation.

15 We've been retained by the J.P.A. to assist
16 them in the preparation of the Environmental Impact
17 Report for the proposed project.

18 What we thought was appropriate to start the
19 presentation this evening of the CEQA process, which is
20 the main reason why we're here tonight, is to start
21 with an overview of CEQA.

22 So the first question is "What is CEQA?"
23 Just to define the acronym, "CEQA" stands for the
24 "California Environmental Quality Act." It was a set
25 of laws and guidelines that were adopted by the State

1 in 1970 and sort of guide the review of new development
2 projects with regard to their potential environmental
3 impacts.

4 The purpose of CEQA is to inform the
5 decision-makers with regard to their approval of the
6 project as well as the public as to the potential
7 environmental impacts of the project.

8 What CEQA is really about is to identify ways
9 to reduce or eliminate those significant impacts and
10 that that can occur by suggesting changes to the
11 project, identifying mitigation measures to reduce
12 impacts, or also identifying alternatives to the
13 project that would reduce its impact.

14 So what CEQA is about is, first, letting you
15 know what the impacts are; then figuring out ways in
16 which those impacts can be reduced so as to not cause a
17 significant impact upon the environment.

18 Now that we have a basic understanding of
19 what CEQA is, let's talk about what EIR is. And the
20 "EIR" stands for "Environmental Impact Report." We'll
21 try to keep the acronyms to a minimum, but some of them
22 are helpful relative to brevity in terms of the
23 discussion of the document itself.

24 What an EIR is, first and foremost, it's an
25 informational document. It's about providing

1 information; it's about disclosing what the impacts of
2 the project are.

3 In the Environmental Impact Report -- it is
4 not an partisan document. We're not here to advocate
5 the project; we're not here to condemn the project.
6 The purpose of the EIR is to evaluate and identify its
7 environmental impacts.

8 CEQA -- unlike it's national sister, which is
9 the National Environmental Protection Act -- CEQA is
10 only interested in the physical environment. So things
11 that affect the environment, such as social issues or
12 economic issues, quality of life, those sorts of things
13 are not within the purview of CEQA.

14 So CEQA is about focusing in on what are the
15 physical impacts of the project. As I indicated a
16 little earlier, the EIR -- the purpose and thrust of
17 the EIR is to identify potential environmental impacts
18 and to identify mitigation measures and to also
19 identify alternatives that could reduce the potentially
20 significant impacts of the project.

21 While we just talked about what an EIR is,
22 it's also important to talk about what an EIR is not.

23 The document doesn't make at a decision about
24 the project. It doesn't even make a recommendation
25 about the project. Whether the project is approved or

2 solely at the discretion of the decision-makers.

3 The EIR is just a tool to help them and
4 inform them so that they can make a reasoned choice and
5 decision about the proposed project.

6 Also, the EIR is not about identifying and
7 analyzing what are called "speculative impacts." And a
8 speculative impact is something that, "Gee, maybe this
9 could happen or maybe that could happen." It's really
10 not about speculating about what the environmental
11 impacts are, but much more grounded in what we know the
12 impacts to be.

13 And I'll just close out the overview with
14 just a restatement of the purpose of the scoping
15 meeting tonight.

16 There really are two purposes for the scoping
17 meeting: One is to inform the community as to what the
18 project is; what the process is; where we are in the
19 process.

20 And, secondly, to invite comments on the
21 scope of EIR: Issues to be analyzed, alternatives to
22 be considered, or anything else that you think is
23 relevant in order to allow us to prepare an
24 Environmental Impact Report that is truly responsive to
25 the community's interest and needs. Next slide,

1 please.

2 What we have done is we have undertaken a
3 preliminary review and consideration of the potential

4 environmental impacts of the proposed project.

5 And what we've done is we've identified a
6 total of ten different categories of environmental
7 issues that are going -- that we think are going to be
8 analyzed in the EIR.

9 If you folks think that there are other
10 issues that need to be analyzed in addition to these
11 ten that are on the screen, that's what we're here for
12 tonight -- is for you to tell us what you think needs
13 to be analyzed in the draft EIR.

14 To just quickly walk through some of the
15 issues: One of the issues that will be addressed in
16 the draft EIR is land use. Land use will look at the
17 relationship of the proposed project to the general
18 plan, the community plan, the redevelopment plan, the
19 city zoning ordinance.

20 And we'll also look at the interface of a
21 project with its adjoining neighbors from a land use
22 perspective.

23 Given that we live in Los Angeles, how can
24 you have environmental review without traffic,
25 circulation, and parking? All three of which are

19

1 probably the three most important aspects of an EIR
2 although that's not to diminish the value of the other
3 subjects.

4 So the project will look at not only impacts
5 of the project's traffic that's generated by the

6 project on existing intersections and freeways in the
7 area; we'll look at issues related to site access;
8 we'll look at needs for improvements and mitigation
9 measures.

10 And we'll look at parking -- whether it
11 provides enough parking. Does it provide too much
12 parking? So we'll evaluate potential parking impacts
13 as well.

14 As Doug has indicated, the project has some
15 very vertical components to it -- some tall towers. As
16 a result, issues regarding aesthetics and visual
17 resources come into play.

18 And aesthetics is "Well, how does this
19 project and how do these buildings fit into the fabric
20 of the area with regard to both the Civic Park and the
21 development sites that Related is going to pursue its
22 land uses on?"

23 Obviously, we're in the neat part of downtown
24 of Los Angeles. And part of it is that we have some
25 old buildings around. And so one of the important

20

1 analyses that will be evaluated in the EIR is the
2 project's relationship with the existing historical
3 resources that may be present in the area.

4 Going more towards physical impacts of the
5 project on its neighbors and on the region are air
6 quality and noise. With regard to air quality, we'll
7 look at impacts during project construction as well as

8 operations for both air quality and noise.

9 We'll look at whether project development
10 would cause a health risk and cause health issues for
11 those that live and work around the project site.

12 Given that the project is large in its size
13 and has a very nice mix of uses from an urban planning
14 perspective, the EIR will also analyze population,
15 housing, and employment issues; particularly, how the
16 project relates to regional plans; what folks think
17 should be happening in this part of town from those
18 perspectives.

19 Given the past uses on the project site,
20 we'll also look at the potential for the presence of
21 hazardous materials and how they may affect the public
22 during construction and perhaps even future residents
23 of the project site.

24 Given that we're looking at a fair number of
25 residential units and a fairly large amount of

21

1 commercial space as well, we're going to analyze public
2 services. So we'll look at the project's potential
3 impacts with regard to police, fire, schools,
4 libraries, and those sorts of items and issues.

5 And closing out the EIR will be utilities.
6 In addition to providing public services, we want to
7 make sure that the utility infrastructure,
8 particularly, with regard to water availability both
9 from a supply standpoint, given that we do live in a

10 desert and water is a precious commodity. So we'll
11 look at water supply.

12 We'll also look at whether the infrastructure
13 that's in the street is sufficient to be able to serve
14 the project and whether any improvements to that
15 infrastructure is needed. Next slide, please.

16 Turning our attention away from the technical
17 side of the document and focusing about process:
18 Wanted to just sort of lay out for those that are not
19 familiar with the CEQA process, what the various steps
20 are with regard to this, placing particular attention
21 upon those elements that are -- those times of the
22 process where the public -- where you folks can
23 participate in an active way with regard to the EIR and
24 its approval.

25 Basically, what we're doing now is we're at

22

1 the scoping meeting and -- as indicated by the icon up
2 on the screen. And then based upon the input we
3 have -- we get from you folks at the scoping meeting as
4 well as comments and responses to the Notice of
5 Preparation, we'll start to the design the EIR.

6 We haven't written anything yet. That's why
7 we're having this meeting at the outset of the process
8 is -- I'm not sitting here with a full EIR -- three,
9 four, 500 pages of written documentation. We're at the
10 beginning. We want to hear what you think should be in
11 the EIR.

12 And then once we understand what should be in
13 the EIR, we'll start to prepare it. Once we're
14 completed with the preparation of the EIR, it will go
15 back out to you folks for public review as noted at the
16 top of the column on the right-hand side of the screen.

17 The public review period will be 45 days
18 during which there will be a public hearing for which
19 you will be able to offer comments at the public
20 hearing. You will also be encouraged to provide
21 comments in writing.

22 Any comment you provide during the draft EIR
23 public review period will be responded to in writing.
24 Nothing is taken for granted; no comment is too small;
25 no comment is too big. We will address all comments

23

1 made on the draft EIR.

2 Once the comments have been responded to,
3 we'll prepare what's called the final EIR. And once we
4 prepare the final EIR, then the project will be ready
5 for its public hearings before the decision-makers for
6 the project.

7 And once again, that will be a wonderful
8 opportunity for you, the public, to come down and let
9 your decision-makers what you think and feel about the
10 project and how it may or may not affect your life.

11 And then once we're done with that, then we
12 file what's called the Notice of Determination and that
13 really concludes the CEQA process.

14 With that, that concludes my presentation
15 tonight. And I'll just turn it back to Martha for just
16 a few brief comments before we allow you folks to talk.

17 MS. WELBORNE: What we'd like to do now is open it
18 up to public comment. Those of you who know how to
19 turn the lights on -- I guess, Rashid or Annette.

20 And we will set up a microphone up in the
21 front up here, and we'll call your names. But anyone
22 who has not turned in a speaker card, we'd love to have
23 it from you. And we'll call you up one at a time. And
24 that is quite a timer up there.

25 MR. LACKOW: Let's try that. I have a big voice

24

1 so -- the first speaker -- the first speaker card that
2 we have tonight is from Mr. Dave Bowen representing
3 L. A. P. D. Would you like to come up and provide a few
4 comments.

5 MR. BOWEN: Hi. I'm new to the neighborhood. I
6 moved into the downtown area from South Pas very
7 recently. I work at the Central Division, which covers
8 downtown, basically bordered on the freeways. And I'm
9 excited about moving downtown because there's been a
10 renaissance, and I want to get on the ground floor of
11 it.

12 I currently reside at 255 South Grand, which
13 is just south of the Disney Hall, catty-corner to the
14 Colburn School and across the street from MOCA.

15 My chief concern as it relates to the project

16 itself is just the proposed residential development
17 adjacent to that. It's going to completely eclipse the
18 views to the north for all the residents who reside on
19 the north side of that building.

20 Currently, I can see about 180 degrees --
21 from City Hall all the way to the Hollywood sign and,
22 of course, the San Gabriels beyond that. Everyone that
23 resides on the north side of the building -- those
24 views are going to be completely eliminated.

25 And the comments I had on the call is that

25

1 projects should take into consideration things that are
2 currently there. And I think the trend we want to
3 create in downtown is to bring more residents down here
4 who live here, who work here -- kind of do one-stop
5 shopping.

6 The only thing I have to go out of town for
7 right now is groceries and clothing. Everything else I
8 can get pretty much get in-house -- entertainment. The
9 kids love it. We can catch the train back to South
10 Pas. I mean, it's very convenient. It's kind of like
11 living in New York with good weather.

12 So I'd like the developers, if they could, to
13 take that into consideration and affirm the positive
14 trend for people that have already taken up residence
15 downtown, not to take away what they came here for.

16 And right now, we have a great view. And
17 that project -- if you could see it, it's here. This

18 is my place right here. And this is the building right
19 here. So that completely blocks it. And there's not a
20 lot of other residential towers on Bunker Hill.

21 There's some below us, but that's kind of like the only
22 one there.

23 So it's kind of hard to countenance having
24 that view taken away. So if you could take that into
25 consideration; otherwise, I'd probably just have to

26

1 move.

2 But -- so it's a very positive time; I'm very
3 positive about it. At Central, at the police
4 department, we're doing a lot to address the issues of
5 on-street homelessness and drug dealing and things like
6 that. There's a misconception of why we have so many
7 people on the street.

8 There are bed counts that we do every night.
9 And on a typical night, bed counts exceed the number of
10 people on the street by over a hundred. People stay on
11 the street because they can use the money -- the money
12 they get -- I got ten seconds.

13 Anyway, basically -- basically they convert
14 the vouchers they get into cash so they can buy drugs.
15 That's basically why they're on the street, so it's a
16 big problem. Okay. Thank you.

17 MR. LACKOW: Thank you.

18 MS. WELBORNE: Thank you.

19 MR. LACKOW: Next speaker is Mr. Hayes.

20 MR. HAYES: Pity the poor officer who has to
21 precede me. I am Tut Hayes, not Ted Hayes. I know you
22 know Ted Hayes as a homeless activist. I'm a homeless
23 advocate. I'll get to the officer later on. I'm not
24 going to get caught by ten seconds.
25 You see, this is sleight of hand. What you

27

1 don't see is what's important. We don't see the
2 off-ramps, on-ramps of the freeways in this area, do
3 we? Huh? Right next to the Music Center, there's an
4 on-ramp, off-ramp.

5 We want to talk about traffic so you know
6 where the traffic's going to be going, where it's going
7 to be coming from. So we need a bigger picture. The
8 big picture. So none of this sleight-of-hand stuff
9 with this little project here and just say we got to
10 talk about traffic later on.

11 In regards to traffic, James Wood, who was
12 the chair of CRA for 14 long years, had a concept
13 called "The People Mover." It was elevated, aerial,
14 sort of like a tram. And it was so unique in concept,
15 it would not only go past buildings but go through
16 buildings and have off platforms inside of buildings
17 who would accommodate that like the 40-story
18 high-rises.

19 We're not going to get around downtown unless
20 that concept is re-engineered and utilized. This
21 pedestrian stuff -- that's fine; that's fine. But

22 somehow you've got to get through downtown.

23 You know what the development's like -- your
24 recent downtown news will shock you, if you haven't
25 seen it all yourself. So we've got to -- even if it's

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1 pedestrians, we'll be like herding cattle. I'm not
2 talking about (unintelligible) Kansas cattle.

3 So we need to know how are we going to move
4 people around. It's really not by buses. We've got
5 buses that are so close together they're running like
6 trains.

7 Well, let me get to the homeless thing a bit.
8 There are 80,000 homeless people in Los Angeles County.
9 I would suggest just modest, 30,000 homeless people in
10 L.A. city. You think they've got 30,000 beds? Huh?
11 You think they've got 3,000 beds? Sure, the shelters
12 have beds. But they don't fill all those beds each
13 night.

14 Half the beds at the Union Rescue Mission are
15 never filled. They don't take in everybody because
16 they've got the bedding and accommodation for them
17 because they have to feed those people.

18 So the officer's lying about there's a
19 homeless count. I mean, I know what the count is. I'm
20 on the Advisory Board for Los Angeles Homeless Service
21 Authority, another Joint Powers Agency.

22 We have to concern ourselves about the
23 incompatibility of these two populations -- so homeless

24 population and this population you have here and the
25 population throughout downtown.

29

1 Nobody's got a remedy for it. Let me show
2 you what the remedy is. They built a restroom for
3 homeless people on Fifth and San Julian. It cost
4 \$315,000. It's a self-cleaning restroom. Okay? And
5 it cycles every 20 minutes. So every hour, three
6 people can use the restroom. See how clever government
7 is with our money? \$315,000 for a restroom.

8 And they're planning on building one on Hill
9 Street and whatever and so forth and so on. This is in
10 relation to the whole concept about -- what do you call
11 it? Cityscape with newsstands and benches and things
12 like that. Viacom. You know who that is. So we have
13 a lot of things to look at.

14 And I think those are the things they say we
15 can't look at. "We cannot look at social issues."

16 Well, what is affordable housing except a
17 social issue? That's always been a social issue.
18 Thank you. I think my time has elapsed.

19 MR. LACKOW: Thank you very much, sir. Okay.

20 Well, we don't have any other cards -- oh,
21 sure.

22 MR. WESTWATER: I'd like to comment on
23 circulation.

24 MS. WELBORNE: Can you repeat your name.

25 MR. WESTWATER: Oh, I'm sorry. Brady Westwater,
Page 28

1 Downtown Los Angeles Neighborhood Council, as usual
2 speaking for myself.

3 One of the problems we have in this area
4 right now is almost all the buses are hitting Union
5 Station, and they're going down these streets. And
6 every time they do sign, they shut them down and
7 reroute the buses. And the problem is some poor guy in
8 Westwood is waiting an extra 20 minutes because they
9 shut down one of these streets downtown.

10 And then it goes to the entire system.
11 Suddenly is the entire city is screwed up because of
12 downtown streets being closed off.

13 So I would like to propose that since -- so
14 there'll be events where they're going to want to use
15 double blocks particularly in front of City Hall. At
16 City Hall steps, you bridge over the road and dip the
17 road a little underneath it so the Civic Plaza, the
18 events could happen on the steps of City Hall and this
19 big plaza that connects directly across to that whole
20 park, raise that up maybe 10 feet above the road, maybe
21 dip the road about 10 feet because you got to dig for
22 the parking garages across the street anyway. So you
23 just extend where you're doing that.

24 And that way, you have this big Civic Plaza
25 without shutting down the street. And the Music Center

1 up on its plinth could bridge over to the park across
2 the street. So the two of those blocks could be
3 connected permanently for events without having to shut
4 down those two streets of traffic.

5 And that way you could have events there
6 without inconveniencing every bus rider in L.A. County,
7 which is what happens every time we do this.

8 So I think that's the type of thinking that
9 needs to be done as Ted was saying. Look how this fits
10 into the whole. Or just like the police officer
11 says -- the views in his building.

12 But then as Mr. Gardner was saying, it's
13 obvious. The views of this building -- if he builds
14 side by side with that building, that building doesn't
15 have very good views either. So maybe they want to
16 move those around so their building has better views,
17 the building next door has better views.

18 So I think it's the contextual items like
19 that. And this is just a schematic model. This is
20 isn't what's being built. So I think those are the
21 types of contextual issues you really need to look at
22 on this project -- how fits into and how it impacts the
23 rest of downtown.

24 MR. LACKOW: Thank you. Mrs. Thompson?

25 MS. THOMPSON: Yes. I just wanted to know --

1 MR. LACKOW: Would you be possible for you to come
2 up so the court reporter has a better shot at being
3 able to report what you say? Thank you very much.

4 MS. THOMPSON: Thank you. I really wanted the
5 question answered so I could write down what an EIR is
6 not. And you gave two reasons what it is not. And I
7 need to know the second reason -- what an EIR is not.

8 MR. LACKOW: Okay. The two points that I had
9 mentioned were: The EIR doesn't make a decision about
10 the project; and the second is it doesn't analyze
11 impacts that may -- that are speculative, that have a
12 remote chance of ever happening.

13 MS. THOMPSON: Wait a minute. It identifies what?

14 MR. LACKOW: So the two things are: The EIR does
15 not make any decisions about the project. So EIR
16 doesn't say whether the project should be approved or
17 not -- approved or denied.

18 And also it only analyzes impacts that are
19 reasonably -- that are reasonably -- that you can
20 expect to happen; that it doesn't deal with what are
21 called speculative impacts, which are things that have
22 a very little chance of ever happening.

23 MS. THOMPSON: Things that can reasonably happen?

24 MR. LACKOW: Uh-huh.

25 SPEAKER: Do you have an example? Like, a meteor

1 striki ng.

2 MR. LACKOW: There you go. That would be a
3 hazardous circumstance that wouldn't be analyzed in the
4 document, but the presence of past contamination would
5 be -- at the site.

6 MS. THOMPSON: Okay.

7 MR. LACKOW: Thank you.

8 MS. THOMPSON: All right. Thank you.

9 MR. LACKOW: Okay. We now have a few more cards.
10 Why don't we do Mr. German -- Jay German.

11 MR. GERMAN: Thank you. I'm fortunate in my
12 lifetime to have had the opportunity to travel to many
13 countries throughout the world. And one of the things
14 that always strikes me is that among tourists and
15 travelers there is an absolute insatiable need to shop.

16 And yet in the provisions for the Civic Park,
17 there is absolutely nowhere for tourists to purchase a
18 memento of his or her trip or for the City and County
19 of Los Angeles to relieve the tourist of some of their
20 money.

21 I would hope, particularly since Los Angeles
22 has such a rich cultural heritage -- we have an
23 enormous Mexican and Central American community; the
24 Pacific Rim countries; all the Asian countries -- Thai,
25 Vietnamese, Korean, Japanese, Chinese -- all with rich

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1 heritages, we can provide perhaps a craft shop for
2 people to come and pick up a little treasure as a
3 memento of their visit to Los Angeles.

4 And at the same time, perhaps we could also
5 provide them with another place where they can actually
6 buy a memento of Los Angeles itself.

7 There is nothing wrong with a souvenir stand.
8 It generates -- or I shouldn't say "stand." That's
9 demeaning -- a souvenir shop or craft shop generates
10 very, very good income.

11 And, obviously, I think that it would impact
12 the circulation plan, obviously. I think if you took
13 the first two blocks between Grand and Hill and put a
14 few shops in there, you would have a drop-off point for
15 buses on Grand and then a pick up point somewhere on
16 Hill or perhaps even farther down depending on how far
17 you want them to walk.

18 The buses drop the people. They spend --
19 they sprinkle their money all the way down the Hill.
20 They get back to the bus, and they go back to -- Hong
21 Kong. It's the cycle of tourist life. And I think we
22 really should consider it.

23 MR. LACKOW: Thank you very much.

24 Next speaker is Cassandra Elliot followed by
25 Joe Clifford.

35

1 MS. ELLIOT: I'm also a resident at the Grand
2 Promenade and have been for the last 14 years. And
3 I've watched a lot of changes going on in downtown.
4 And I find this project to be very exciting.

5 But my one question or my one concern is in

6 regard to design. I want to see some cosy neighborhood
7 feel put into this project -- not some big sterile kind
8 of buildings and atmospheres where people -- who only
9 feel safe when everything looks new and clean and neat
10 and, you know, just for those individuals to come in.

11 I understand the concept of selling the
12 condos and the nature of people who perhaps have that
13 income level.

14 But for myself who has been committed -- as I
15 said, for 14 years to downtown and years before that
16 working in the garment industry -- I want to see
17 something cosy in my neighborhood.

18 This is my neighborhood. And I want a little
19 cosy places where I can go and feel that, you know,
20 it's a neighborhood feel to it because downtown is
21 unique. In downtown you can go up to somebody on the
22 street and talk to them, start a conversation because
23 you're waiting at the bus stop with them.

24 I don't get that experience when I go to the
25 Westside. You say hello to somebody on the Westside,

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1 and you get a look like, "Oh my god. What do you want
2 from me." You know?

3 I spent a lot of time in Melbourne,
4 Australia. And they're also going through the same
5 changes we're going through in terms of revitalization
6 of the downtown area. And they have lots of little
7 restaurants -- you've -- lot of people on the street --

8 casual, dressed up, people of different economic levels
9 feeling comfortable with each other.

10 And that's the one thing I'd like to see -- a
11 warmth in this project because Bunker Hill has that
12 depth of history that we do have in California. I
13 mean, as shallow as it may be, nevertheless, there is a
14 depth and there's some warmth. And I think we need to
15 hold onto that and make sure the project has that cosy,
16 warm feeling of neighborhood and openness. Thank you.

17 MR. LACKOW: Thank you.

18 Next speaker. Speaker is Joe Clifford
19 followed by Allen Leslein.

20 MR. CLIFFORD: Hi. I would like to second that,
21 too. It's a great point to make it more on a human
22 scale. It's a big project, but, you know, keep in mind
23 that we're all, you know, about four to six feet tall.
24 So...

25 Anyway, I'd also like to -- I know you said

37

1 there's a lot of pedestrian elements. And the Grand
2 Avenue, you didn't really describe exactly how that
3 long stretch to Cesar Chavez is going to be.

4 But I'd like you to keep in mind that
5 downtown doesn't have many places to exercise, not a
6 lot of open space. So if you can consider bike paths.
7 You know, the corn fields park is going to be developed
8 and the river is going to be developed.

9 So if you could keep in mind, you know, maybe

10 making bike paths or running paths where people can --
11 not just walk, but also get some exercise and maybe
12 connect in with those future projects, too. I mean, it
13 would really bring a lot of energy to downtown. So...

14 MR. LACKOW: Thank you very much. Okay.

15 Next is Allen Leslein, followed by Shiraz.

16 MR. LESLEIN: I'd like to talk, first of all,
17 about our concern about parking in the area. Most of
18 the lots are existing surface parking. And some of
19 them have small parking structures on them, but they
20 support the needs of the surrounding area.

21 And my question is what will happen to that
22 parking because that needs to be considered as well as,
23 of course, all the additional parking that will be
24 required by the new construction.

25 And then, the third part of the parking

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1 component is there's a lot of adjacent development
2 that's going on in the immediate area, the surrounding
3 area, that should also be considered.

4 For example, I work for the District Courts.
5 And I'm overseeing the construction of the new
6 courthouse immediately adjacent to your site.

7 Unfortunately we aren't allowed to provide
8 public parking within our facility. And we have a lot
9 of jurors coming in, you know, four or five hundred on
10 Tuesdays alone. And I don't know where these people
11 are going to park either because all the surface lots

12 are being taken away.

13 So I'd like some strong consideration to be
14 given to that. Second of all, I'd like to suggest that
15 the tall slender buildings, I think, are a really good
16 idea. I like those a lot. I'm not so crazy about the
17 big massive one across Hill Street from us. Perhaps
18 some weight can come to break that up.

19 But as part of the EIR, I'd like to see some
20 consideration given to how the masses of these
21 buildings -- we've already talked about views -- are
22 impacting light and shadow on the neighboring
23 structures as well as how they might be blocking
24 movement of air or wind currents.

25 And I don't know if materials are under

39

1 consideration. But we know there was a problem with
2 Disney Hall in glare on neighboring buildings. And we
3 would hope to avoid something of that type of a
4 situation.

5 Also, I don't know if it's within your scope
6 or not, but I would like to see some high energy
7 standards or some high energy goals established for the
8 structures that we're talking about.

9 And, third, it's just kind of a small
10 observation. But, you know, there is so much filming
11 going on downtown, it always seems to be an
12 afterthought. And so I'd like some forethought given
13 to it, especially for developing some iconic buildings

14 here that maybe we have some areas available for
15 staging that maybe the park can service.

16 But, you know, we need to think about our
17 film crews because L.A. is about filming. And so we
18 need to think how we can accommodate them with having a
19 minimal disruption to the residents and the tenants of
20 downtown.

21 MR. LACKOW: Thank you very much.

22 Next is Shiraz, followed by Jim Colligan.

23 MR. TARERI: Hi. I think one of the interesting
24 tricks for the people who are going through the EIR
25 process here is sort of defining what the project is.

40

1 It's obviously -- and actually, you guys have
2 talked about this in other outreach meetings -- you've
3 got several different plots. They're not all
4 contiguous, obviously. And so in the project is
5 perhaps a little more amorphous than you typically get.

6 In addition, obviously, as everyone
7 recognizes, there are a ton of other projects nearby
8 downtown, in other parts of downtown; for example, the
9 First Street development that's being planned.

10 That's really going to create additional
11 impacts. And I just hope, as you're looking at sort of
12 what's the ultimate scope -- even as you're looking at
13 multiple parcels, I hope you're looking beyond that
14 border to realize the traffic impacts and things are
15 going to be broader than simply your four or five or

16 six parcels and the park -- but, you know, the overall
17 area. And there's great synergy there and a great
18 opportunity, but there's also a greater (inaudible).

19 MR. LACKOW: Thank you very much. Next is
20 Jim Colligan followed by Kathryn Hargreaves.

21 MR. COLLIGAN: My name is Jim Colligan, and I live
22 in the same apartment house that a couple of the
23 previous speakers did -- in the Third and Grand facing
24 the Museum of Contemporary Art.

25 I came here about seven years ago, in '97.

41

1 And I had lived for 40 years in Japan. So I don't
2 really have an investment as a long-time citizen of Los
3 Angeles that I should be up here telling you what to
4 do. But given the opportunity, I will take this
5 opportunity.

6 Looking at the project my impressions are
7 sterility, first; second, that it is geared to -- more
8 to visitors and tourists. And any of the people who
9 come here to live are going to be almost necessarily
10 high income.

11 That is not to say that we're living in a
12 high income place at the moment. But it is prime as
13 far as convenience goes. This was mentioned.

14 And what I'd be much more interested in
15 seeing is something that is, as was mentioned earlier,
16 something homey. Something that is neighborhood.

17 Now, I know that that's somewhat foreign to

18 the Los Angeles concept in general. So I understand.
19 But it seems to me that as far as a target that that
20 would be a very fine target to have that would be
21 geared to the residents who are already here, but also
22 to those who are coming in.

23 I wonder and I've long wondered what intent
24 there is to try to bring some of the population of
25 Broadway, which is filled with people almost always

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1 until late at night -- to bring them into this area.

2 How much of that intention is going to be
3 realized, I really don't know. But it seems to me that
4 while there could be good and bad sides to it, that it
5 necessarily would be something that, as far as the city
6 goes, should be a name that is involved here.

7 I confess I'm a little bit threatened because
8 I am concerned -- the first gentleman spoke about that
9 tall building that's going to be on the north side that
10 is going to ruin his view.

11 I'd be more concerned myself at the fact that
12 we all may have to move out of there. I don't know
13 what's going to become of that building which does
14 exist right now and does provide housing for some of
15 us.

16 But I do think that it is a great place, and
17 I'm very happy to have found myself there. What will
18 happen when this project gets underway, I really don't
19 know.

20 Another thing that I've noticed here -- the
21 filming was mentioned. I have occasion frequently to
22 go to Little Tokyo. And frequently in the morning when
23 I'm heading down there, I can't get through because of
24 races -- that is, foot races or bicycle races and
25 movie-making.

43

1 MR. LACKOW: Thank you very much.

2 Kathryn Hargreaves.

3 MS. HARGREAVES: I just wanted to point out a
4 population that many people probably don't even think
5 about or know, which is the feral cat population.

6 There are actually some people out there that
7 maintain these feral cat colonies.

8 I've just been reading -- just been educating
9 myself about this where feral cats -- the new model is
10 to not simply pull cats out of abandoned buildings and
11 wherever they're living. And there's many here and
12 many that -- I'm not even going to point out where they
13 are downtown because I don't want people to displace
14 them on purpose -- but to simply pull cats out and
15 euthanize them.

16 It apparently doesn't work because 90 percent
17 of all kittens born to female cats are to feral
18 mothers. So there's a huge problem in the sense that
19 you can't just pull them out and kill them because they
20 will just be filled in with new populations.

21 So the new model is to trap these animals,

22 neuter them, and put them back out as place holders so
23 that your population -- in other words, to maintain a
24 feral cat population that's steady. And it's a more
25 humane way, less animals get killed.

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1 We know that animals are important to people,
2 like, look at all the people who stayed behind in New
3 Orleans because they didn't want to leave their
4 animals.

5 So what I'm asking is -- many times when you
6 have huge construction projects and even if --
7 especially then -- certain populations will be
8 displaced. And if there are people out there taking
9 care of these colonies that you will work with them to
10 either relocate the colonies or to somehow maintain
11 them in the areas that you are building.

12 MR. LACKOW: Thank you very much.

13 Okay. That's the last card I have. Is there
14 anyone else who would like to speak who has not filled
15 in a card?

16 MR. QUINN: I'd like to say something.

17 MS. WELBORNE: Sure. Come on.

18 MR. LACKOW: If you can -- since we don't have a
19 card, can you state your name and address. That would
20 be great.

21 MR. QUINN: Actually, I'd like to speak to the
22 audience more than you.

23 MR. LACKOW: Okay. I'm not offended.

24 MR. QUINN: Okay. Well, you're part of the
25 audience in a sense, too.

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1 There's a project out there called Grand
2 Intervention, which probably some of you know about,
3 put on by the Norman Lear Center at U.S.C. I have no
4 association with them, but I'm very interested. So I
5 wanted to mention it because a few people here had such
6 good ideas for the park.

7 It's specifically about the park, and they're
8 soliciting ideas from the public about what the park
9 should be and what it could be. And I'm not sure what
10 the relation with Related is, but we -- that's to be
11 seen in the future.

12 But I wanted to recommend anybody who has
13 ideas about the park to look at their website and
14 submit your proposals because it can't do any harm.
15 And, certainly, these ideas can be put away for the
16 future if this doesn't happen this time. The park is
17 going to change in the future once the county buildings
18 are resolved.

19 One more thing: I have personally started a
20 blog about the park. And you can find a link to it on
21 the Grand Intervention site. So if you're interested,
22 curious, and want to participate, I'd ask that you look
23 it up.

24 UNIDENTIFIED SPEAKER: In the Opinion Section;
25 right?

1 MR. QUINN: The L. A. Times Sunday Opinion has
2 links to the whole project each weekend. Thank you.

3 MR. LACKOW: Thank you. Okay. Is there anybody
4 else who would like to provide any comments of any
5 sort? Okay.

6 Since I don't see any, what we'll do is we'll
7 keep the boards up for another 15, 20 minutes or so.
8 And we'll be here to receive any additional comments
9 that you may have.

10 In addition to this, you can also submit your
11 comments via e-mail or regular mail. And remember that
12 the deadline for submitting your comments is
13 October 10th.

14 I'd just like to thank everybody for coming
15 out tonight and hopefully this was informative for you
16 folks. Thank you.

17

18 (The proceedings concluded at 7:27 p.m.)

19 /////

20 /////

21 /////

22

23

24

25

1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) SS.

3

4 I, Judith Hollifield, CSR No. 12564, a
5 Certified Shorthand Reporter in and for the State
6 of California, do hereby certify:

7 That the foregoing transcript is a true
8 record of the proceedings.

9 IN WITNESS WHEREOF, I have hereunto
10 subscribed my name this 26th day of September,
11 2005.

12

13

14 _____
15 J. Hollifield
16 Certified Shorthand Reporter
17 License No. 12564

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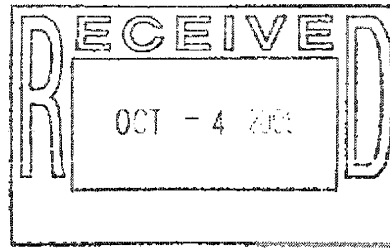
25



APPENDIX A-4

NOP RESPONSE LETTERS

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, OFFICE OF REGIONAL PLANNING
 100 MAIN STREET, IGR/CEQA BRANCH
 LOS ANGELES, CA 90012-3606
 PHONE (213) 897-3747
 FAX (213) 897-1337
 TTY (213) 897-4937



*Flex your power!
 Be energy efficient!*

October 3, 2005

IGR/CEQA cs/050906 - NOP

City of Los Angeles

The Grand Avenue Project

5th St. to Cesar Chavez Ave.

Land uses of up to 2060 residential units, 225 hotel rooms,
 479,500-sq. ft. retail, 600,000-sq. ft. commercial office, and
 5,500 parking spaces

Vic. LA-101-1.30; SCH #

Ms. Martha Welborne
 The Los Angeles Grand Avenue Authority
 /C/O California Community Foundation
 445 S. Figueroa St., Suite 3400
 Los Angeles, California 90071

Dear Ms. Welborne:

Thank you for including the California Department of Transportation in the environmental review process for The Grand Avenue Project. Based on the information received, we have the following comments:

The massive scale of the overall project is expected to have an extensive and significant traffic impact on the freeway system especially on the already congested US-101 (Hollywood Freeway) and I-110 (Harbor Freeway) at the 4-level interchange through the downtown area. Both the US-101 and I-110 freeways are already operating beyond its design capacity during the extended peak commute periods and both freeways also experience heavy traffic congestion during off-peak periods. We are available to meet in advance with the respective agencies and consultants to discuss expected traffic impacts to the freeway system from trips generated by the project and to discuss required mainline and related freeway mitigation measures.

We recommend the implementation of Smart Growth measures that encourages jobs-housing balance, implementation of enhanced transit operations, the use of non-motorized transportation and coordinated employee carpool and vanpool rideshare options to reduce the use of single occupancy vehicles during peak commute periods.

A traffic study will be needed to evaluate the project's overall impact on the State transportation system including the mainline Us-101 (Hollywood Freeway), I-110 (Harbor Freeway) and all affected freeway on/off ramps. The traffic study should include, but not be limited to:

- 1) Assumptions used to develop trip generation/distribution percentages and assignments.

- 2) An analysis of ADT, AM and PM peak hour volumes for both the existing and future (year 2025) conditions. This should also include level-of-service calculations using the HCM 2000 methodology. The analysis should include the following:
 - existing traffic volumes
 - project and cumulative traffic volumes
 - future traffic volumes projections for year 2025
 - existing level-of-service (LOS) calculations
 - project and cumulative level-of-service (LOS) calculations

- 3) Any mitigation measures proposed to alleviate traffic impact should include, but not be limited to the following:
 - financing
 - scheduling considerations
 - implementation responsibilities
 - monitoring plan

- 4) The Equitable Share responsibility for traffic mitigation measures will need to be calculated as determined by the percentage increase in projected peak period trips resulting in operational impacts to US-101 and I-110 mainline freeway facility and affected on/off-ramps. The Los Angeles Grand Avenue Authority will need refer to Appendix "B" Methodology for Calculating Equitable Mitigation Measures found in our Caltrans Guide for the Preparation of Traffic Impact Studies. The Guide can be found on the Internet at:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

We request that advance copies of the Draft Traffic Impact Study be submitted for review prior to the release of the Draft EIR to facilitate our internal Caltrans review. Advance copies should be sent to the undersigned:

Cheryl J. Powell
Caltrans District 7 Office of Regional Planning
IGR/CEQA Branch
100 South Main Street
Los Angeles, CA 90012

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/050906 and you may contact me at (213) 897-3747.

Sincerely,



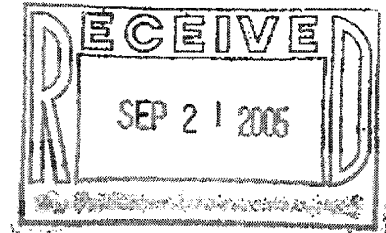
Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov



September 16, 2005

Ms. Martha Welborne
The Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

**Notice of Preparation of a Draft Environmental Impact Report for
The Grand Avenue Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

Consistent with the SCAQMD's environmental justice enhancement I-4, in October 2003, the SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts and localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second

indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

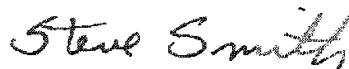
In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 - Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:li

LAC050908-01LI
Control Number

SOUTHERN CALIFORNIA



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• Alan Wiegand, Ontario

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Dan Becerra, Simi Valley • Carl Montemurro, San
Ventura County • Tom Young, Font Huemmer

Orange County Transportation Authority: Lou
Green, County of Orange

Riverside County Transportation Commission:
Kippen Loose, Menard

San Bernardino County Transportation Commission:
Cork Mathews, Menard

6 October 2005

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Ste 3400
Los Angeles, CA 90071

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Report
for the Grand Avenue Project
SCAG No. I 20050576

Dear Ms. Welborne:

Thank you for submitting the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the above-mentioned project to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans.

SCAG staff has evaluated your submission for consistency with the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). The proposed Project considers the construction of more than 500 dwelling units. CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide, Regional Transportation Plan, and Compass Growth Vision that may be applicable to your project are outlined in the attachment. We expect the EIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer to them in your EIR. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the Proposed Project.

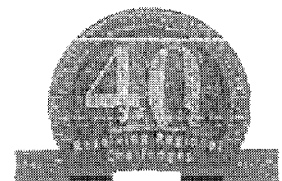
SCAG's Compass Growth Vision, adopted in 2004, outlines a future for the region that includes the creation of sustainable communities through urban infill and redevelopment. We are confident that the Grand Avenue Project will help achieve many of these goals, especially as it proposes mixed-use infill near existing transit and employment areas. For a clearer understanding of the intent of and possibilities with Compass, please consult the Compass Growth Vision in addition to the guidance offered in this letter. We look forward to following the success of this project as it fulfills the intent of the Compass Growth Vision.

Please provide a minimum of 45 days for SCAG to review the EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1851. Thank you.

Sincerely,

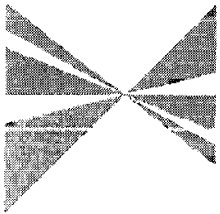
Brian Wallace
Associate Regional Planner
Intergovernmental Review

DOCS# 114875



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SOUTHERN CALIFORNIA



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San Bernardino County: Gary Oviatt, San Bernardino County • Lawrence Dole, Brea • Paul Juma, Alhambra • Leo Sam Garcia, Grand Terrace • Tom Jeter, Inglewood • Steve McCallie, Highland • Deborah Robertson, Santa Ana • Alan Wexler, Ontario

Ventura County: Boby Mink, Ventura County • Glen Brunson, Santa Valley • Carl Mosenbauer, San Bernardino • Ron Young, Port of Orange

Orange County Transportation Authority: Lou Gouge, County of Orange

Riverside County Transportation Commission: Shelli Lower, Platero

Ventura County Transportation Commission: Aron Matuszak, Alhambra

6 October 2005

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Ste 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

Please find enclosed SCAG's comment letter on the NOP for the Grand Avenue Project. As you may be aware, the Southern California Association of Governments adopted its regional growth vision, called Compass, in 2004. The Compass Vision outlines a future for the region that includes the creation of sustainable communities based on four principles: Mobility, Livability, Prosperity, and Sustainability. For a clearer understanding of Compass and the 2% Strategy, please consult our website, www.socalcompass.org.

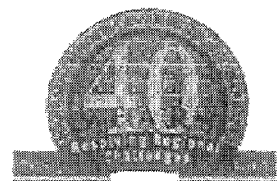
SCAG is now in the process of implementing the Compass Vision through its "2% Strategy," which focuses on infill and redevelopment in strategic locations within the region, including areas near existing and proposed transit. We are excited about the opportunity that the Grand Avenue Project presents for the City of Los Angeles and the Southern California region. SCAG staff has been following the progress of the Grand Avenue Project – even taking a self-led tour of the project area – and are interested in its potential to be a model example of fulfilling the goals of Compass and the 2% Strategy.

We are interested in ways to monitor the Grand Avenue Project's progress as it evolves and begins to reshape a significant portion of downtown Los Angeles in a manner consistent with the 2% Strategy. Please keep us informed of additional steps in the EIR process as well as any other opportunities for comment or discussion. If you have any questions about the Compass program or the attached comments, please contact me at (213) 236-1851. Thank you.

Sincerely,

Brian Wallace
Associate Regional Planner
Intergovernmental Review

DOCS# 1120/2v1



**COMMENTS ON THE NOTICE OF PREPARATION OF
 A DRAFT ENVIRONMENTAL IMPACT REPORT
 FOR THE GRAND AVENUE PROJECT
 SCAG NO. I20050576**

PROJECT DESCRIPTION

The proposed Project would consist of a mixed-use development with 2,060 residential units, 479,000sf of retail, 225 hotel rooms, 600,000sf of office space, and a civic park in downtown Los Angeles. Several new high-rise buildings will be constructed on parcels along and near Grand Avenue between 1st and 3rd Streets.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the West Gateway Redevelopment Project.

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

Regional Growth Forecasts

The DEIR should reflect the most current SCAG forecasts, which are the 2004 RTP (April 2004) Population, Household and Employment forecasts. The forecasts for your region and subregion are as follows:

Adopted SCAG

Regionwide

Forecasts

	<u>2005</u>	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>
Population	19,967,835	21,294,093	22,561,643	23,781,797	24,935,979
Households	6,260,842	6,758,353	7,259,762	7,773,287	8,281,758
Employment	8,368,607	9,456,903	10,038,316	10,614,348	11,171,537

Adopted

LACITY

(subregion)

Forecasts

	<u>2005</u>	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>
Population	4,032,474	4,176,079	4,237,887	4,298,891	4,357,359
Households	1,330,724	1,393,635	1,460,680	1,528,771	1,596,055
Employment	1,833,577	2,031,342	2,095,758	2,157,226	2,213,427

City of Los

Angeles

Forecasts

	<u>2005</u>	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>
Population	3,950,347	4,090,125	4,147,285	4,203,702	4,257,771
Households	1,311,134	1,372,873	1,438,731	1,505,615	1,571,712
Employment	1,800,766	1,994,358	2,057,435	2,117,623	2,172,642

* The 2004 RTP growth forecast at the regional, county and subregional level was adopted by RC in April, 2004. City totals are the sum of small area data and should be used for advisory purposes only.

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

3.04 *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*

3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and development.*

3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*

3.15 *Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented*

developments around transit stations and along transit corridors.

- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*
- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

REGIONAL TRANSPORTATION PLAN

The 2004 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals

- Maximize mobility and accessibility for all people and goods in the region.
- Ensure travel safety and reliability for all people and goods in the region.
- Preserve and ensure a sustainable regional transportation system.
- Maximize the productivity of our transportation system.
- Protect the environment, improve air quality and promote energy efficiency.
- Encourage land use and growth patterns that complement our transportation investments.

Regional Transportation Plan Policies

- Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.

Performance Indicator	Performance Measures	Definition	Performance Outcome
Mobility	• Average Daily Speed	Speed-experienced by travelers regardless of mode.	10% Improvement
	• Average Daily Delay	Delay-excess travel time resulting from the difference between a reference speed and actual speed. Total daily delay and daily delay per capita are indicators used.	40% Improvement
Accessibility	• Percent PM peak work trips within 45 minutes of home		Auto 90% Transit 37%
	• Distribution of work trip travel times		Auto 8% Improvement Transit 8% Improvement
Reliability	• Percent variation in travel time	Day-to-day change in travel times experienced by travelers. Variability results from accidents, weather, road closures, system problems and other non-recurrent conditions.	10% Improvement
Safety	• Accident Rates	Measured in accidents per million vehicle miles by mode.	0.3% Improvement
Performance Indicator	Performance Measures	Definition	Performance Outcome
Cost Effectiveness	• Benefit-to-Cost (B/C) Ratio	Ratio of benefits of RTP investments to the associated investments costs.	\$3.08
Productivity	• Percent capability utilized during peak conditions	Transportation infrastructure capacity and services provided	
		• Roadway Capacity - vehicles per hour per lane by type of facility	20% Improvement at known bottlenecks
		• Transit Capacity - seating capacity utilized by mode	N/A
Sustainability	• Total cost per capita to sustain current system performance	Focus in on overall performance, including infrastructure condition. Preservation measure is a subset of sustainability.	\$20 per capita, primarily in preservation costs
Preservation	• Maintenance cost per capita to preserve system at base year conditions	Focus is on infrastructure condition. Sub-set of sustainability.	Maintain current conditions
Environmental	• Emissions generated by travel	Measured/forecast emissions include CO, NOX, PM10, SOX and VOC. CO2 as secondary measure to reflect greenhouse emissions.	Meets conformity requirements
Environmental Justice	• Expenditures by quintile and ethnicity	Proportionate share of expenditures in the 2004 RTP by each quintile.	No disproportionate impact to any group or quintile

Principle 3: Enable prosperity for all people

- Provide, in each community, a variety of housing types to meet the housing needs of all income levels.
- Support educational opportunities that promote balanced growth.
- Ensure environmental justice regardless of race, ethnicity or income class.
- Support local and state fiscal policies that encourage balanced growth
- Encourage civic engagement.

Principle 4: Promote sustainability for future generations

- Preserve rural, agricultural, recreational and environmentally sensitive areas.
- Focus development in urban centers and existing cities.
- Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
- Utilize "green" development techniques.

CONCLUSIONS

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001



Metro

Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

October 7, 2005

Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa St., Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Grand Avenue Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

1. A Traffic Impact Analysis (TIA), with highway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix B. The geographic area examined in the TIA must include the following, at a minimum:
 1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and
 2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

Among the required steps for the analysis of development-related impacts to transit are:

- Evidence that in addition to Metro, all affected municipal transit operators received the NOP for the Draft EIR;
- A summary of the existing transit services in the area;
- Estimated project trip generation and mode assignment for both morning and evening peak periods;
- Documentation on the assumptions/analyses used to determine the number of percentage of trips assigned to transit;

- Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
 - An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.
2. Considering the number of bus routes and rail facilities serving the Grand-Olive corridor, the Draft EIR should address construction impacts to existing transit riders and coordination with the transit operators.
 3. The mezzanine of the Metro Red Line Civic Center station contains “knock out” panels that could allow direct access to the Grand Avenue Project. Design impacts to the Civic Center Metro Red Line Station must be reviewed by Metro to insure on-going operation and safety of the Metro Red Line.
 4. The design guidelines developed for “First Street Now” by the team of Suisman, Campbell, and Rios for Project Restore should also be considered to tie the Grand Avenue Project to the developments along 1st Street from Disney Hall to the Mariachi Plaza in Boyle Heights.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,



Susan F. Chapman
Program Manager, Long Range Planning

Los Angeles Unified School District

Office of Environmental Health and Safety

ROY ROMER
Superintendent of Schools

DAN M. ISAACS
Chief Operating Officer

ANGELO J. BELLONIO
Director

October 10, 2005

The Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street – Suite 3400
Los Angeles, CA 90071

**SUBJECT: Notice of Preparation of a Draft EIR
 The Grand Avenue Project
 *Los Angeles, CA***

Thank you for giving the Los Angeles Unified School District (LAUSD) the opportunity to provide information regarding educational facility service in the area of the proposed ***Grand Avenue Project*** located in downtown Los Angeles. The Project site consists of the Grand Avenue right-of-way, between 5th Street and Cesar Chavez Avenue; the Los Angeles Civic Mall, between Spring Street and Grand Avenue, and five non-contiguous parcels located in the Bunker Hill Urban Renewal Project Area. The Proposed Project includes the creation of a revitalized Civic Park within the 16-acre Los Angeles County Civic Mall; streetscape improvements along Grand Avenue between Fifth Street and Cesar Chavez Avenue to attract and accommodate more pedestrian traffic; and development of five parcels, four of which are located within the Grand Avenue Implementation Plan, with the fifth parcel to be separately acquired by the Related Companies. Projected land uses on the five parcels consist of a combination of residential, retail, office, and hotel uses. Total development proposed for the five parcels consists of up to 2,060 residential units, 20 percent of which (up to 412 units) would be provided as affordable housing; approximately 225 hotel rooms; up to 479,500 square feet of retail space; up to 600,000 square feet of commercial office space; and up to 5,500 parking spaces. All proposed parking will be provided in podium and subterranean parking structures.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (traffic, noise, air, pollution, etc.) will occur. Since significant impacts to LAUSD schools are anticipated, mitigation measures designed to help reduce or eliminate such impacts are included in this response.

Schools currently serving this project include ***Castelar Elementary School, Gratts Elementary School, Virgil Middle School, and Belmont Senior High School***. Information regarding each school's capacity and enrollments is attached. In addition, nine additional schools are planned in the area to relieve known overcrowding. These schools are listed on

the attached table of LAUSD Schools Enrollment and Capacities. Information related to school developer fees can be obtained by contacting the **LAUSD Developer Fee Office** at (213) 743-3670. The District updates this information on a yearly basis. The next update is planned in mid October 2005.

Thank you for your attention to this matter. If you need additional information, please call me at (213) 241-3199.



Glenn Striegler -- RG
Environmental Assessment Coordinator

Attachments

c: Richard Alonzo
Cheuk Choi
Luis Valentino
Barbara Sandusky
Gary Yoshinobu
Pauline Garzon

Los Angeles Unified School District

Office of Environmental Health and Safety

ROY ROMER
Superintendent of Schools

DAN M. ISAACS
Chief Operating Officer

ANGELO J. BELLOMO
Director

ENVIRONMENTAL IMPACT RESPONSES

Approval of the development of the proposed **Grand Avenue Project** in Los Angeles, CA warrants the following mitigation measures to address environmental impacts related to school traffic, pedestrian routes, and transportation safety issues at *Castelar* and *Gratts Elementary Schools*, *Virgil Middle School*, *Belmont High School*, and nine additional LAUSD campuses in the project area: .

- LAUSD Transportation Branch at (323) 342-1400 **must be contacted** regarding the potential impact upon existing school bus routes.
 - School buses must have unrestricted access to schools.
 - During the construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.
 - During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may affect school buses' on-time performance and passenger safety.
 - Because of provisions in the California Vehicle Code, other trucks and construction vehicles that encounter school buses, using red-flashing-lights must-stop-indicators will have to stop.
 - The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicle routes to school may be impacted.
- Installation and maintenance of appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes will not pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards (at contractor's expense) is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractor's are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

333 South Beaudry Avenue, 20th Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the 900,000 students and 80,000 employees of the Los Angeles Unified School District.

Los Angeles Unified School District

Facilities Services Division

ROY ROMER
Superintendent of Schools

JAMES A. MCCONNELL, JR.
Chief Executive, Facilities Services Division

J. A. MEHULA
Deputy Chief Executive, New Construction Branch

RENA S. PEREZ
Director, Master Planning and Demographics

September 23, 2005

TO: PCR Services
233 Wilshire Blvd, Suite 130
Santa Monica, CA 90401

FROM: Rena Perez, Director
Master Planning & Demographics

SUBJECT: *Environmental Impact Report Information Requested for: THE GRAND AVENUE PROJECT, LOS ANGELES*

The attached is in response to your request for information received September 12, 2005.

Included please find an ***Enrollment and Capacities Report*** for the schools that may be impacted by the development project(s) in question. This report contains data on each school's current and projected capacities, enrollments, and school calendars, and is designed to address any questions pertaining to overcrowding and factors related to school capacity.

Please note that the data in this report already take into account portable classrooms on site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools.

Additional information can be found in LAUSD's 2005 "Strategic Execution Plan" at www.laschools.org/sep/, on LAUSD's Facilities main webpage at www.laschools.org/, or on LAUSD's general website, at www.lausd.net.

ATTACHMENTS

1. ENROLLMENTS AND CAPACITIES REPORT
2. BOUNDARY DESCRIPTIONS FOR SCHOOLS SERVING PROPOSED PROJECT
Attendance area boundary descriptions for existing schools identified as serving the proposed project.

Sincerely,
Rena Perez, Director

LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES
 PROJECT SERVED: THE GRAND AVENUE PROJECT
 SCHOOL YEAR: 2004-2005

Location Code	School Name	2	3	4	5	6	7	8	9	10	11	12
		Current Calendar	Current Capacity	Eligible Enrollment	Actual Enrollment	Current seating Overage/(shortage)	Overcrowded Now?	Projected Enrollment	Projected Capacity	Projected seating Overage/(shortage)	Overcrowding Projected in Future?	
2863	CASTELAR EL	1-TRK	898	855	841	43	No	819	887	(132)	Yes	
2385	GRATTS EL	3-TRK	1046	1005	959	41	Yes	812	827	(165)	Yes	
8462	VIRGIL MS	3-TRK	2819	4523	2803	(1704)	Yes	4207	1950	(2257)	Yes	
8543	BELMONT SH	3-TRK	4815	6764	4789	(1848)	Yes	7953	3042	(4911)	Yes	

Location Code	School Name	13	14
	Schools Planned to Relieve Known Overcrowding		
	Gratts New PC	1-TRK	400
	Central LA New MS # 1	1-TRK	1701
	Central LA New MS # 3	1-TRK	310
	Central LA New Learning Center # 1	1-TRK	4240
	Central Region Belmont SPAN Reconfiguration	1-TRK	1971
	Central LA HS # 9	1-TRK	1728
	Central LA HS #10	1-TRK	1944
	Central LA HS #11	1-TRK	2835
	Central LA HS #12	1-TRK	513

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED, DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

NOTES:

- School's ID code
- School's name
- The current calendar the school is operating on. Schools operate on a multi-track calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.
- School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.
- The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
 - Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
 - A key goal of the Superintendent and Board of Education is to return all schools to a track's normal 2-year master calendar (1-TRK).
- The number of students actually attending the school now, including secondary-grades magnet students.
- Current seating coverage or (shortage); equal to (current capacity) - (current enrollment).
- Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
 - School is currently on a multi-track calendar
 - There is currently a seating shortage
 - There is currently a seating coverage of LESS THAN or EQUAL TO a safety margin of 30 seats
- The capacity the school will have after a visit to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.
- Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
- Projected seating coverage or (shortage); equal to (projected capacity) - (projected enrollment).
- Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
 - School remains on a multi-track calendar
 - There is a seating shortage in the future
 - There is a seating coverage of LESS THAN or EQUAL TO a safety margin of 30 seats in the future
- The calendar the school will have after implementing operational goals such as full-day kindergarten and class-size reduction.
- The anticipated capacity of new schools planned for the area. While these new schools will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Information Technology Division

LOC. CODE: 2385

**SUBJECT: CLARIFICATION OF THE BOUNDARY DESCRIPTION FOR EVELYN T. GRATTS SCHOOL
EFFECTIVE JULY 1, 1996 (CLARIFIED 7-5-96).**

This clarification of the existing boundary description does not change the intent of the boundary as it was approved on July 1, 1996. (Changes have been highlighted by "strikeout" and/or boldface type.) The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES K - 5)

BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY *
WILSHIRE BOULEVARD * WITMER STREET (BOTH SIDES) * SIXTH
STREET * LOMA DRIVE (BOTH SIDES) * THIRD STREET (BOTH SIDES) *
UNION PLACE (BOTH SIDES EXCLUDED) * CROWN HILL AVENUE (BOTH
SIDES) * ~~SECOND STREET (BOTH SIDES)~~ * LOMA DRIVE (BOTH SIDES).

OPTIONAL: GRATTS AND CASTELAR SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND
EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division,
at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School Demographic and Boundary Unit
Heritage School School Traffic and Safety Education Section
Pupil Statistics Department of Transportation, City of L. A.
Transportation Branch

OS ANGELES UNIFIED SCHOOL DISTRICT
Information Technology Division

LOC. CODE:2863

**SUBJECT: NEW SERVICE BOUNDARY DESCRIPTION FOR CASTELAR SCHOOL
EFFECTIVE JULY 1, 1996.**

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 1984 (updated July 1, 1995).

This is an official copy for your file.

(GRADES K - 5)

INNES AVENUE (BOTH SIDES EXCLUDED) * LILAC PLACE (BOTH SIDES EXCLUDED) * ELYSIAN PARK AVENUE (BOTH SIDES EXCLUDED) * STADIUM WAY * LILAC TERRACE (BOTH SIDES) * LOOKOUT DRIVE (BOTH SIDES) * STADIUM WAY (BOTH SIDES) * PASADENA FREEWAY * BERNARD STREET AND EXTENSIONS * NORTH SPRING STREET * ALAMEDA STREET * FIRST STREET * FREMONT AVENUE (BOTH SIDES EXCLUDED) * TEMPLE STREET * BEAUDRY AVENUE (BOTH SIDES) * SUNSET BOULEVARD * EVERETT STREET (BOTH SIDES EXCLUDED) * EVERETT PLACE AND EXTENSION (BOTH SIDES EXCLUDED).

OPTIONAL: CASTELAR AND GRATTS SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L.A.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Facilities Services Division

LOC. CODE: 8462

SUBJECT: NEW SERVICE BOUNDARY DESCRIPTION FOR VIRGIL MIDDLE SCHOOL
EFFECTIVE JULY 1, 2001

The area described below has been approved by the superintendent as the attendance area served by the above mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1 1996 (updated 7-1-97).

This is an official copy for your file.

(GRADES 6-8)

MELROSE AVENUE * NORMANDIE AVENUE * MONROE STREET AND EXTENSION
(INCLUDING 826 MARIPOSA AVENUE AND 773 ALEXANDRIA AVENUE) *
ALEXANDRIA AVENUE * MONROE STREET * VERMONT AVENUE * BEVERLY
BOULEVARD * TEMPLE STREET * SILVER LAKE BOULEVARD * BELLEVUE
AVENUE * MICHELTORENA STREET * MARATHON STREET * RAMPART
BOULEVARD * SUNSET BOULEVARD * ALVARADO STREET * MONTROSE
STREET * GLENDALE BOULEVARD * TEMPLE STREET * BELMONT AVENUE *
BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY * THIRD
STREET * LUCAS AVENUE * SIXTH STREET * LAFAYETTE PARK PLACE *
WILSHIRE BOULEVARD * WESTERN AVENUE.

For assistance, please call Master Planning and Demographics Branch, Facilities Services Division,
at (213) 633-7606.

APPROVED: JAMES A McCONNELL, Chief Facilities Executive, Facilities Services Division

DISTRIBUTION: School
Pupil Statistics
Transportation Branch

Master Planning and Demographics
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Facilities Services Division

LOC. CODE: 8543

**SUBJECT: NEW SERVICE BOUNDARY DESCRIPTION FOR BELMONT SENIOR HIGH SCHOOL
EFFECTIVE JULY 1, 2005.**

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 2004.

This is an official copy for your file.

(GRADES 9 – 11)

MELROSE AVENUE * NORMANDIE AVENUE * HOLLYWOOD FREEWAY * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * ALVARADO STREET AND EXTENSION * WHITMORE AVENUE AND EXTENSION * LANDA STREET (BOTH SIDES, INCLUDING ALL OF TWIN OAK STREET) * LANDA STREET EXTENDED FROM THE INTERSECTION OF LANDA STREET AND STADIUM WAY * GOLDEN STATE FREEWAY * WEST BOUNDARY OF ELYSIAN PARK * ACADEMY ROAD AND EXTENSION EASTERLY AND SOUTHERLY TO THE INTERSECTION OF STADIUM WAY AND PASADENA FREEWAY * STADIUM WAY AND EXTENSION * NORTH SPRING STREET * ALAMEDA STREET * SANTA ANA FREEWAY * LOS ANGELES RIVER * WHITTIER BOULEVARD * SIXTH STREET * MAIN STREET * PICO BOULEVARD * HARBOR FREEWAY * VENICE BOULEVARD * UNION AVENUE * 14TH STREET * BURLINGTON AVENUE * PICO BOULEVARD * MAGNOLIA AVENUE * 12TH STREET * WESTMORELAND AVENUE * ELEVENTH STREET * VERMONT AVENUE * WILSHIRE BOULEVARD * KINGSLEY DRIVE * BEVERLY BOULEVARD * KINGSLEY DRIVE.

(GRADE 12)

MELROSE AVENUE * NORMANDIE AVENUE * HOLLYWOOD FREEWAY * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * ALVARADO STREET AND EXTENSION * WHITMORE AVENUE AND EXTENSION * LANDA STREET (BOTH SIDES, INCLUDING ALL OF TWIN OAK STREET) * LANDA STREET EXTENDED FROM THE INTERSECTION OF LANDA STREET AND STADIUM WAY * GOLDEN STATE FREEWAY * WEST BOUNDARY OF ELYSIAN PARK * ACADEMY ROAD AND EXTENSION EASTERLY AND SOUTHERLY TO THE INTERSECTION OF STADIUM WAY AND PASADENA FREEWAY * STADIUM WAY AND EXTENSION * NORTH SPRING STREET * ALAMEDA STREET * SANTA ANA FREEWAY * LOS ANGELES RIVER * WHITTIER BOULEVARD * SIXTH STREET * MAIN STREET * WASHINGTON BOULEVARD * HARBOR FREEWAY * VENICE BOULEVARD * UNION AVENUE * 14TH STREET * BURLINGTON AVENUE * PICO BOULEVARD * MAGNOLIA AVENUE * 12TH STREET * WESTMORELAND AVENUE * ELEVENTH STREET * VERMONT AVENUE * WILSHIRE BOULEVARD * KINGSLEY DRIVE * BEVERLY BOULEVARD * KINGSLEY DRIVE.

For assistance, please call Master Planning and Demographics, Facilities Services Division, at (213) 633-7606.

APPROVED: JAMES A. McCONNELL, Jr., Chief Facilities Executive, Facilities Services Division

DISTRIBUTION:	School	Master Planning and Demographics
	Pupil Statistics	School Traffic and Safety Education Section
	Transportation Branch	Department of Transportation, City of L. A.

I am writing on behalf of the **Los Angeles Public Library** in response to the Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting sent by the Los Angeles Grand Avenue Authority dated August 31, 2005.

The proposed Grand Avenue Project will definitely impact the Los Angeles Public Library system, especially at the following three locations:

Central Library, 630 W. 5th Street, LA 90071

Chinatown Branch Library, 639 N. Hill Street, LA 90012

Little Tokyo Branch Library, 203 S. Los Angeles Street, LA 90012

We anticipate impact from these four components of the project:

1. Increase in Residents – The addition of **2,060 residential units** will increase the residents in the Grand Ave. corridor. The residents will generate much more usage of the library facilities, collections and equipment, especially during evenings and weekends.
2. Increase in Retail Employees and Retail Traffic – The creation of **479,500 s.f. of retail space** will bring about an increase in employees needed to staff the retail operations as well as the resultant increase in retail traffic consisting of buyers, browsers, window shoppers and restaurant goers, etc. The employees will bring increased usage of the libraries during their lunches, breaks and other off work hours. The retail traffic will bring additional users to the libraries and increase demand for library services
3. Increase in Office Workers – The development of **600,000 s.f. of office space** will bring an increase in office workers to the downtown area. These workers will mainly impact the libraries during the daytime hours.
4. Increase in Visitors and Tourists – The addition of **225 hotel rooms and the creation of a revitalized Civic Park and streetscape improvements along Grand Avenue** will attract more tourists to downtown Los Angeles. The Central Library is already a cultural destination for many tourists. A revitalized Civic Park and a more pedestrian friendly Grand Ave. will bring in even more tourists to Los Angeles and Central Library.

Please consider the impact these increases and changes will bring to the three library facilities, namely Central Library, Chinatown Branch and Little Tokyo Branch of the Los Angeles Public Library. Increase of patronage translates into need for more books, more audio-visual materials, more computers, more staff and more wear and tear on the facilities and the grounds. Los Angeles Public Library recommends that a Library Impact Fee be assessed for this project.

For further information, please contact Juliana Cheng at 213-228-7576 (jcheng@lapl.org) or Rona Berns at 213-228-7574 (rberns@lapl.org).

Mailed information should be sent to:

Los Angeles Public Library
Library Facilities Division
630 W. Fifth Street
Los Angeles, CA 90071

Thank you.

Juliana Cheng
Los Angeles Public Library



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

DONALD L. WOLFE, Director

October 5, 2005

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.org

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: LD-0

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

RESPONSE TO NOTICE OF PREPARATION THE GRAND AVENUE PROJECT

Thank you for the opportunity to review the notice of preparation for a Draft Environmental Impact Report (DEIR). We have no comments at this time but would like to review the EIR when it is ready for public review. Please send three copies of the DEIR to:

Mr. Suk Chong
County of Los Angeles
Department of Public Works
Land Development Division
P.O. Box 1460
Alhambra, CA 91802-1460

If the EIR is available electronically or on-line, please forward it or the link to Mr. Chong at schong@ladpw.org.

If you have any questions, please contact Mr. Chong at (626) 458-7150.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

ROSSANA D'ANTONIO
Assistant Division Engineer
Land Development Division

----- Original Message -----

From: David Bowen

To: EIRcomment@grandavenuecommittee.org

Sent: Monday, October 10, 2005 12:12 PM

Subject: Grand Ave Project

Hello,

I'm Ofcr. Dave Bowen with LAPD.

In addition to my concern that the buildings proposed for parcels L/M-2 not completely block mountain/city views of residents of 255 S.Grand, I've noted a few others I think will enhance acceptance and overall success of project.

Pedestrian Friendly:

Bunker Hill is linked by pedestrian bridges. This keeps us out of traffic and protected from elements. To fully integrate w/Hill neighborhood, pedestrian flow(which will markedly INCREASE) should be facilitated with a series of architecturally exceptional pedestrian bridges. These would be especially helpful at 1st and Grand and in the Civic Mall to preserve continuity of space across streets that currently break it up.

Good Neighbor:

California Plaza is a Good neighbor. They have all manner of outdoor concerts, elevators, escalators and "pedestrian facilitators" which make it a good place to walk through even when the office towers are closed.

Grand Development MUST be an organic development that enhances the quality of life for those currently on the hill and the folk it brings with it. The grid works for cars, for pedestrians, it's anathama to a quality interesting and livable civic experience.

It was a pleasure talking with you and i look forward to seeing your vision for Hill realized.

Sincerely,

Dave Bowen

----- Original Message -----

From: Joyce Dillard

To: Grand Avenue Committee

Cc: Timothy F. Brick ; Jeffrey B. Chapman

Sent: Saturday, October 08, 2005 12:36 PM

Subject: THE GRAND AVENUE PROJECT-COMMENTS ON THE NOTICE OF PREPARATION DUE OCTOBER 10, 2005

THE GRAND AVENUE PROJECT
COMMENTS ON THE NOTICE OF PREPARATION DUE OCTOBER 10,
2005

The Project is a majority residential project. In meetings held by the Grand Avenue Authority discussion discounted the importance of the existing infrastructure of Los Angeles County and State Court and Administration buildings. These existing buildings are key to the business infrastructure. This Project has failed to identify its effects on those resources. Economy is key to the financing of environmental effects and that lack of income-and property-tax producing structures place a burden on the taxpayer.

Water Quality is certainly an issue since the City of Los Angeles passed bonds for Proposition O also known as the "Clean Water, Ocean, River, Beach, Bay Storm Water Cleanup Measure General Obligation Bonds." This project will have an effect on water.

Geology and Soils and Mineral Resources should also be analyzed. During the construction of the nearby County buildings, oil was found. This was many years ago, but Los Angeles within the boundaries of the original City land grant, is well known for oil wells.

These wells may not be historically mapped properly or abandoned under no current environmental standards. Test results should be submitted.

Organizations in the communities adjoining the Los Angeles River and the Arroyo Seco are in the planning stages of a Greenway Project connecting the mountains in Altadena to the LA River. Native vegetation to the AREA is part of the goal as well as the preservation of wildlife. Agricultural and biological resources are important to the citizens of the City of Los Angeles.

Traffic, Circulation and Parking are also critical in accessibility to the Project region in terms of access to the region due to the needs of a 24-hour period. This means that access should be analyzed for the

residents overnight, the workforce during the day, the evening entertainment tourist, the student and all weekend usage.

The Civic Park is critical. The land is publicly owned and should remain so. The original City intent was to have land accessible to all, maintained forever for its citizens and the availability to the poor.

Even though the County and the State own these parklands both existing and planned, that original intention should be recognized and honored as this project is in the City Core. Public monies have been applied for in the design of this park. The State requires City oversight and public comment.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Start your day with Yahoo! - Make it your home page!
<http://www.yahoo.com/r/hs>

----- Original Message -----

From: Mary Lastorina

To: EIRcomment@grandavenuecommittee.org

Sent: Tuesday, September 27, 2005 6:26 PM

Subject: LA Grand Ave Authority CA Environmental Quality Act Response Form

I am a resident at the Grand Promenade Apartments on Grand Ave. (month to month client)

The apartment building is safe with 24 hour security. Maintenance is done efficiently. The pool, jacuzzi and sauna are clean. The leasing agents are respectful. Public transportation is close. School for my son is close by and safe as well. Over all, at this time I could not ask for more for the lease amount. The renovations here are excellent. Thank you for your time.

Yahoo! for Good

[Click here to donate](#) to the Hurricane Katrina relief effort.

----- Original Message -----

From: Dorian

To: eircomment@grandavenuecommittee.org

Sent: Tuesday, October 04, 2005 10:13 PM

Subject: EIR Comments

Hello,

Please take into consideration the following:

A. Although the design process is in it's beginning stages, it was obvious by some of the markups that many of the structures would be very cumbersome and bulky in stature. I know that the main towers are slim, but we want all structures to be slim and properly placed in the lots.

Two of the speakers had valid arguments against the residential units that will be built next to Grand Promenade. Those structures are Extremely Bulky and for NO reason. What is so difficult about building taller and thinner? What is so difficult about changing the placement of the structures on the lots?

If the architect thinks is to much work, maybe he should quit....

B. There was mention of a market. What type of market are we talking about? Is it another grocery as the Ralphs on 9th street? That would be a good thing for everyone on Bunker Hill. People could shop before they go home, etc... Although I'm not sure if there would be enough people living in downtown to support two Grocery Markets and so this is why I ask.

C. What is the Stall count per square feet on the garage? Will this help mitigate the stalls that will be taken out of the picture by the development?

D. Why - OH - Why is the city demanding the developer to spend money on a park that will sit between two Government Buildings full of angry people being sued and which may or may not be torn down in the near future????

How can the architect build a viable park without knowing what's going to sit around it, if anything. What are they going to do? Build this park and then go back and spend more money in re-designing it when the buildings are torn? Why not incorporate or create a master plan NOW for the entire area?

E. Design - Design - Design

All new structure should be designed with an eye on the future while taking into account the surrounding area. The wait Disney Hall is quite an impressive structure, but the side walk is just hideous!

That plain concrete floor without any trees is just absolutely out of place.

I hope the new development is just as modern on top as it is at the bottom - where the people actually walk around.

The designs should be:

- a. As slim as possible
- b. As tall as possible
- c. As modern as possible
- d. As fun as possible
- e. Have as much retail at the bottom as possible
- f. Take neighboring structures into consideration
- g. Have as much parking as possible
- h. Have as much landscape as possible
- i. Have as much set-backs as possible
- j. Be as bold as possible
- k. Revitalize

We do NOT want another Failure as the Omni Hotel which was originally designed as a cylindrical tower with a beautiful light dome on top and ended up being a building that not even the architect could put his name on. The design was changed because apparently it would have blocked the view from the towers on Olive. After who knows what, the design was changed to a block more disturbing to the entire neighborhood than the slim and cylindrical original design. The hotel is actually just as tall as the towers it was supposed to obstruct and just as long. At least the cylinder would have only blocked some of the units and would have been much more appealing to the eyes.

I hope this helps.

Thank you,

Dorlan Mattar
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213 531 2716
213 236 0601 Fax

-----Original Message-----

From: Williams Margaret [mailto:williams.m@mfb.com]

Sent: Monday, September 19, 2005 3:41 PM

To: EIRcomment@grandavenuecommittee.org

Subject: Contact Person for Mellon 1st Business Bank

The contacts for Mellon 1st Business Bank, located at 601 West 5th Street Los Angeles, CA 90071 are

Anthony Q. Evans, EVP & COO

Hours: 8:00am - 4:00pm

Telephone #: 213-596-4300

Margaret A. Williams

Hours: 8:30am - 5:00pm

Telephone #: 213-596-4392

If you have questions or need additional information, please call or email.

Thank you.

Margaret A. Williams

Mellon First Business Bank

601 W. Fifth St.

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— Original Message —

From: Woo, Lanny

To: EIRcomment@grandavenuecommittee.org

Cc: Poindexter, John ; De La Cuba, Millie

Sent: Thursday, September 22, 2005 4:47 PM

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) and Scoping Meeting - The Grand Avenue Project

Martha,

I would like to thank you for giving the City of Pasadena the opportunity to comment on the NOP for the DEIR for "The Grand Avenue Project". The City of Pasadena will not be sending any scoping comments on the proposed project. If you have any questions, please contact me at (626) 744-6776.

Thank you,

Lanny Woo

lwoo@cityofpasadena.net

