

Findings of Fact and Statement of Overriding Considerations

for the
Los Angeles Street Civic Building Project

SCH # 2012051030

Prepared for:
City of Los Angeles Department of Public Works
Bureau of Engineering, Environmental Management Group
1149 South Broadway, 6th Floor
Los Angeles, California 90015-2213
Attn: Maria Martin

Prepared by:
ICF
601 W. 5th Street, Suite 900
Los Angeles, CA 90071

November 2016

Contents

1	Introduction	1
1.1	Purpose of Findings and the Statement of Overriding Considerations	1
1.2	Overview of the Proposed Project	2
1.3	Document Organization	3
2	Statement of Environmental Effects and Required Findings	3
2.1	Aesthetics	5
2.1.1	Description of Potential Effects	5
2.1.2	Mitigation Measures	5
2.1.3	Findings	5
2.1.4	Rationale	6
2.1.5	References	6
2.2	Air Quality and Greenhouse Gas Emissions	6
2.2.1	Description of Potential Effects	6
2.2.2	Mitigation Measures	7
2.2.3	Findings	8
2.2.4	Rationale	8
2.2.5	References	9
2.3	Cultural Resources	9
2.3.1	Description of Potential Effects	9
2.3.2	Mitigation Measures	10
2.3.3	Findings	12
2.3.4	Rationale	12
2.3.5	References	13
2.4	Geology and Soils	13
2.4.1	Description of Potential Effects	13
2.4.2	Mitigation Measures	13
2.4.3	Findings	14
2.4.4	Rationale	14
2.4.5	References	14
2.5	Hazards and Hazardous Materials	14
2.5.1	Description of Potential Effects	14
2.5.2	Mitigation Measures	15
2.5.3	Findings	16

2.5.4	Rationale	17
2.5.5	References	17
2.6	Land Use and Planning	17
2.6.1	Description of Potential Effects	17
2.6.2	Mitigation Measures	17
2.6.3	Findings	17
2.6.4	Rationale	18
2.6.5	References	18
2.7	Noise and Vibration	18
2.8	Transportation and Traffic	18
2.8.1	Description of Potential Effects	18
2.8.2	Mitigation Measures	19
2.8.3	Findings	23
2.8.4	Rationale	24
2.8.5	References	24
2.9	Utilities, Service Systems and Energy	24
3	Alternatives Considered and Preferred Project	24
3.1	Alternatives Considered but Not Analyzed in the Draft EIR	25
3.2	Alternatives Analyzed in the Draft EIR	25
3.3	Preferred Project	26
3.4	Environmentally Superior Alternative	28
4	Statement of Overriding Considerations	29

1

2 Introduction

This Findings of Fact (Findings) and the Statement of Overriding Considerations summarize the findings of environmental impacts of the *Los Angeles Street Civic Building Project Environmental Impact Report* (EIR) - (City of Los Angeles 2013, SCH No. 2012051030) and presents the Statement of Overriding Considerations. This section presents an overview of the purpose of this document, summarizes the proposed Project (which is the Preferred Project), and presents the organization of this document.

2.1 Purpose of Findings and the Statement of Overriding Considerations

Section 15091 of the California Environmental Quality Act (CEQA) Guidelines (and Section 21081 of the California Public Resources Code) require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more written findings for each such impact. According to Section 21081, “no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following possible findings with respect to each significant effect:
 1. Changes or alterations have been required in, or incorporated into, the project to mitigate or avoid the significant effects on the environment.
 2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
 3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.”

Section 21081.6 of CEQA also requires public agencies to adopt a monitoring and reporting program for assessing and ensuring the implementation of proposed mitigation measures. The mitigation measures identified in the Mitigation Monitoring and Reporting Plan (MMRP) for the Los Angeles Street Civic Building Project, which is provided under separate cover, are those identified within this Findings and the Statement of Overriding Considerations.

The Statement of Overriding Considerations is a written statement explaining the specific reasons why the social, economic, legal, technical, or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts and why the Lead Agency is

willing to accept such impacts. This statement shall be based on the final EIR and/or other substantial evidence in the record.

2.2 Overview of the Proposed Project

The proposed Project, described in Chapter 3.0 of the Draft EIR, would reuse the site of the Parker Center building to develop a civic building in close proximity to City Hall where currently dispersed City departments and services could be consolidated into a single location. The existing Parker Center building is now vacant and is considered to be unsafe for occupancy by the Los Angeles Department of Building and Safety and the Los Angeles Fire Department. The EIR analyzed three build alternatives that would rehabilitate the Parker Center building (B1); partially demolish, rehabilitate, and construct an addition to the Parker Center building (B2); or completely demolish and construct a new building in place of the Parker Center building (B3). As described in Chapter 3 of this document, Alternative B3 has been carried forward as the proposed or Preferred Project and will henceforth be referred to as the Preferred Project.

The Preferred Project would result in the full demolition of the existing Parker Center building and construction of a new office building, which would consist of approximately 753,730 gross square feet, and approximately 1,173 parking spaces with a maximum height of approximately 450 feet. The Preferred Project would include office and commercial space, and a childcare facility. The analysis presented in the EIR was based on conceptual designs; therefore, some flexibility was anticipated in order to meet the future needs of the City. The proposed 753,730-square-foot program could be accommodated in one or two buildings on the site. The new building(s) could take on a variety of configurations, but would generally fill the footprint of the existing Parker Center building. Outdoor open space and a pedestrian connection between City Hall to the west, and the Little Tokyo neighborhood to the east and south would be provided. The Preferred Project also includes an optional inter-building tunnel or bridge that would connect City Hall East to the rehabilitated Civic Building.

Demolition of the existing building would be approached floor-by-floor, starting from the top floor of the building and progressing downward. The demolition phase would last approximately 8 to 10 months. The construction phase would last approximately 18 to 24 months. Light-duty excavators with hydraulic breakers would be used. The building foundations would be removed with heavy equipment.

The objectives of the Project are as follows:

1. Reduce travel time for City employees during the work day by relocating City staff closer to City Hall.
2. Improve customer service by consolidating City services that are dependent upon each other into one building that is in close proximity to other City services.
3. Support City of Los Angeles sustainability initiatives by rehabilitating or constructing a building that meets the City's Green Building Code.
4. Re-activate a City-owned property that is currently underutilized.
5. Ensure the health and safety of City employees by providing a work environment that meets current environmental, seismic, and fire/life safety regulations.

2.3 Document Organization

This Findings and the Statement of Overriding Considerations are organized in the following way:

- Section 1.0, Introduction, provides background information of the purpose of Findings and the Statement of Overriding Considerations and presents the organization of this document and provides a brief overview of the proposed Project.
- Section 2.0, Statement of Environmental Effects and Required Findings, identifies the issue areas for which the Preferred Project would have no impact or a less than significant impact, and presents a summary of the significant effects of the Preferred Project along with the one or more written findings made by the City of Los Angeles, as the Lead Agency, explaining how it dealt with each of the significant effects and mitigation measures.
- Section 3.0, Alternatives Considered, describes the alternatives evaluated in the EIR, and the findings and rationale for selection of the Preferred Project and rejection of the alternatives, including the Environmentally Superior Alternative.
- Section 4.0, Statement of Overriding Considerations, explains in detail why the social, economic, legal, technical, or other beneficial aspects of the Preferred Project outweigh the unavoidable, adverse environmental impacts and why the City, as the Lead Agency, is willing to accept such impacts.

3 Statement of Environmental Effects and Required Findings

This section discusses the impacts and mitigation measures identified for the Preferred Project, and makes findings for all areas of potential impact.

The EIR focused on those potential effects of the Preferred Project on the environment that the Lead Agency, i.e., the City, has determined may be significant. Chapter 6 of the EIR determined that the Preferred Project would have either no impact or less than significant impacts regarding the following issue areas:

- Agriculture and Forestry Resources
- Biological Resources
- Population and Housing
- Public Services
- Mineral Resources
- Hydrology and Water Quality
- Recreation

As described in Section 15128 of the CEQA Guidelines, and detailed in the EIR, these issues have no potential for significant impacts and required no further environmental review or analysis beyond the discussion in Chapter 6 of the Draft EIR.

The following issue areas analyzed in Chapter 4 of the Draft EIR were determined to result in less than significant impacts:

- Noise and Vibration
- Utilities, Service Systems, and Energy

Potentially significant impacts (from construction and/or operation) occurring as a result of implementation of the Preferred Project that warrant mitigation measures would be in the following resource areas:

- Geology and Soils: Potential impacts related to placing people in areas known to have seismic hazards related to earthquakes.
- Hazards and Hazardous Materials: Potential impacts resulting from construction activities upsetting contaminated soils, contaminated groundwater, and asbestos containing materials and lead-based paint.

The issue areas determined in the Draft EIR to have unavoidable significant impacts from the construction of the proposed Preferred Project, even after mitigation, include:

- Aesthetics: The Parker Center building is considered to be a visual/historic resource. The Preferred Project would result in demolition of the Parker Center resource, a significant and unavoidable impact. In addition, under the Preferred Project, the proposed Civic Center building would create a new source of shade/shadow on Bowron Square, a significant and unavoidable impact.
- Air Quality and Greenhouse Gas Emissions: While construction emissions of reactive organic compounds (ROC), nitrous oxide (NO_x), and particulate matter (PM_{2.5}), could be mitigated to less-than-significant levels per SCAQMD thresholds, construction of the optional inter-building circulation tunnel would result in substantial emissions of ROC, NO_x, and PM_{2.5}, cannot be mitigated to less-than-significant levels. In addition, operation of the Preferred Project would result in mobile-source ROC and NO_x pollutant emissions that would exceed South Coast Air Quality Management District (SCAQMD) thresholds. This impact would be significant and unavoidable.
- Cultural Resources: The Parker Center building is considered to be an historical resource and the Preferred Project would result in demolition of this building, a significant unavoidable impact. In addition, demolition of the Parker Center building and replacement with a new civic building, would result in indirect impacts to the Los Angeles Civic Center Historic District because Parker Center would no longer convey its significance as a police facility within the District, resulting in a substantial adverse change in the historic significance of the district, a significant and unavoidable impact.
- Land Use and Planning: Because the Parker Center building, an historic building, would be demolished under the Preferred Project, the Project would conflict with land use policies in the Central City Community Plan that promote preservation and reuse of historic buildings. This would be a significant and unavoidable impact.
- Transportation and Traffic: Operation of the Project would result in a significant change in volume/capacity (V/C) ratio and level of service (LOS) in the 2020 future scenario at six study intersections: Los Angeles Street/Temple Street interaction, Judge John Aiso Street/Temple Street intersection, Alameda Street/Temple Street intersection, Main Street/1st Street

intersection, Los Angeles Street/1st Street intersection, and Judge John Aiso Street/San Pedro Street/1st Street intersection. This impact would be significant and unavoidable.

Each of the resource areas analyzed in the EIR is discussed in terms of:

- *Description of Potential Effects* are specific descriptions of the environmental effects identified in the EIR as significant or potentially significant.
- *Mitigation Measures* are the proposed mitigation measures for the impacts identified as significant or potentially significant.
- *Findings* are the findings made in accordance with Section 21081 of CEQA. One of the three possible findings is made for each significant or potentially significant impact, in response to Section 15091 of the CEQA Guidelines. The significance of the environmental impacts after mitigation is also provided.
- *Rationale* is a summary of the reasons for the findings.
- *References* are notations on the specific section in the EIR or other information source that support the findings.

3.1 Aesthetics

3.1.1 Description of Potential Effects

The existing Parker Center building would be demolished and replaced with a taller building (approximately 450 feet tall) comparable to existing, though not matching in design. Because the existing building is significant as both a historic and visual resource, its demolition would result in a significant and unavoidable impact to a visual/historic resource. In addition, the proposed building would change the existing Project area shade/shadow patterns, creating far larger north, northeast, and northwest-trending shade/shadow patterns than currently exist. These changes do not have the potential to affect shade/shadow sensitive residential viewers — all of whom are found southeast and south of the Project site; nor would it affect Toriumi Plaza, which is located directly south and, therefore, is outside of the shade/shadow impact area. However, Bowron Square, a public open space located approximately 500 feet to the northwest would fall well within the shade/shadow area under this alternative. Accordingly, a significant impact to that shade sensitive setting would result.

3.1.2 Mitigation Measures

No feasible mitigation measures were identified that would address the resulting impacts and meet Project objectives.

3.1.3 Findings

For the above impacts to aesthetics, the following finding is made:



Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

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

The potential impacts to aesthetics from the operation of the proposed Los Angeles Street Civic Building Project are found to be:

☒ Significant ☐ Not Significant

3.1.4 Rationale

The Preferred Project and its design elements would be appropriate for its setting, namely as a civic building located within the Civic Center area; however, demolition of the Parker Center building, an historic and visual resource is unavoidable under the Preferred Project. Furthermore, design of the Preferred Project assumes a new building that would cast a new shadow upon Bowron Square. Because no feasible mitigation measures were identified that would address this impact and still achieve adequate building square footage or floor space efficiency to achieve the Project objectives, significant unavoidable impacts to aesthetic resources would occur as a result of the Preferred Project. While the other alternatives analyzed in the EIR would not have these impacts, the Preferred Project would best meet the Project objectives and is the most cost effective alternative considered.

3.1.5 References

Section 4.1 of the Draft EIR addresses the Project's aesthetic impacts.

3.2 Air Quality and Greenhouse Gas Emissions

3.2.1 Description of Potential Effects

Construction of the Preferred Project would result in regional nitrogen oxides (NO_x) emissions that would be significant and unavoidable with the bridge or tunnel Inter-Building Circulation Option. Localized impacts related to short-term emissions of particulate matter (PM₁₀ and PM_{2.5}) during construction would be significant and unavoidable after implementation of mitigation measures.

Impacts related to Reactive Organic Compounds (ROC) and NO_x emissions during long-term Project operations would be significant and unavoidable. This is because no Project-level mitigation measures are available that would reduce mobile-source emissions. In addition, the Preferred Project would result in increased greenhouse gas (GHG) emissions compared to existing conditions. The increase in GHG emissions due the Preferred Project could result in a cumulatively considerable contribution to adverse climate change impacts prior to implementation of mitigation measures.

3.2.2 Mitigation Measures

The following mitigation measures would help to reduce impacts related to construction and operation of the Preferred Project related to air quality and greenhouse gas emissions:

AQ-1: During construction, non-volatile organic compounds (VOC) containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings shall be used where feasible, or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable. VOC-containing materials shall be Super-Compliant Low VOC paint that meets "super-compliant" VOC standard of <10 g/L of the South Coast Air Quality Management District (Rule 1113). These requirements shall be specified in the final architectural plans to be approved by the City of Los Angeles Department of Building and Safety prior to issuance of building permits.

AQ-2: Construction-period Haul Trucks – Model year 2010 and newer diesel haul trucks shall be used for material delivery trucks and soil import/export; if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NO_x and PM emissions requirements.

AQ-3: Construction Off-road Equipment – Phase in the use of off-road construction equipment per the following schedule:

- Project Start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

AQ-4: SCAQMD "SOON" funds – Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website:

<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

AQ-5: Use of existing electricity infrastructure – The City shall require by contract specifications that construction operations shall rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines to the extent feasible. Contract specification language shall be reviewed prior to issuance of a grading permit.

GHG-1: Prior to the issuance of building permits, the Project applicant shall prepare a recycling/solid waste reduction plan, subject to review and approval by the City of Los Angeles Department of Building and Safety. The City shall ensure that the proposed Project maintains a recycling/solid waste reduction program that achieves a minimum reduction of 20 percent by volume of solid waste for Alternative B1, and 25 percent by volume for Alternatives B2 and B3.

GHG-2: Prior to the issuance of building permits, the City of Los Angeles Building Safety Department shall ensure that the proposed Project incorporates energy conservation measures into the design of the proposed Project that exceed mandatory requirements lighting efficiency requirements by 10 percent.

GHG-3: Prior to the issuance of building permits, the City of Los Angeles Building Safety Department shall ensure that the proposed Project incorporates water conservation measures that shall include, but shall not be limited to, the following: reduce potable water demands by installing water-conserving, low-flow faucets, toilets, and urinals, etc.

3.2.3 Findings

For the above impacts to air quality and greenhouse gas emissions, the following findings are made:

- ☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- ☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency
- ☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The potential impacts to air quality and greenhouse gas emissions from the operation of the Preferred Los Angeles Street Civic Building Project are found to be:

☒ Significant ☒ Not Significant

3.2.4 Rationale

The mitigation measures identified above would reduce the air quality impacts associated with Project construction; however, these mitigation measures would not fully mitigate air quality impacts, particularly related to the Inter Building Circulation option. No additional mitigation can reduce this impact to a less-than-significant level and meet the Project objectives. Due to the size of the proposed building and the resulting traffic associated with the Preferred Project,

operation of the Project would result in significant and unavoidable air quality impacts that cannot be mitigated without compromising the objectives of the Project. While other alternatives analyzed in the EIR would result in reduced air quality impacts, the Preferred Project would best meet the Project objectives and is the most cost effective alternative considered. The cumulative impact of the Preferred Project's GHG emissions would be rendered less than cumulatively considerable with implementation of mitigation measures GHG-1, GHG-2, and GHG-3.

3.2.5 References

Section 4.2 of the Draft EIR addresses the Project's air quality and greenhouse gas emissions impacts.

3.3 Cultural Resources

3.3.1 Description of Potential Effects

Historic Resources

The Parker Center building has been evaluated for historic significance and has been determined to be eligible for the National Register of Historic Places as a contributor to the Los Angeles Civic Center Historic District. In addition, the Parker Center building itself has been determined individually eligible for the California Register of Historic Resources. The Preferred Project would result in the full demolition of the Parker Center building and would replace it with a new civic building. This would result in a significant and unavoidable impact to both the Parker Center building and the Los Angeles Civic Center Historic District.

Cumulative Impacts

The original design of the Parker Center site included not only the building, but extended to design of a parking structure and parking lot, landscape, and hardscape features of the entire block. Moreover, in 1958 the Motor Transport Division, consisting of two buildings, was constructed at the southeast corner of the site.

Any one of these activities might not result in a significant impact. However, the physical destruction of these features over the course of three past projects, Metropolitan Communications Dispatch Center, Los Angeles Police Department Metropolitan Detention Center, and Toriumi Plaza, coupled with the proposed changes associated with the Preferred Project eliminate the integrity of setting and feeling, resulting in a cumulatively considerable impact under CEQA.

Design Work of Welton Becket in the Los Angeles Area

Under the Preferred Project, Parker Center (a Welton Becket-designed building) would be demolished, which represents a significant Project impact. The 2010 EIR prepared for the Los Angeles Memorial Sports Arena Redevelopment Project determined that, although the Sports Arena is eligible for the California Register of Historic Resources (CRHR) under Criterion 1, it is not eligible under Criterion 3 for either its architecture or as the work of Welton Becket. In spite

of this determination, the Sports Arena remains part of the body of work of Welton Becket in the Los Angeles area (Los Angeles Memorial Coliseum Commission 2010).

Major Welton Becket buildings in the Los Angeles area that have been lost or demolished over time include the Pan Pacific Auditorium and the Lever Brothers building. Many more have experienced alterations, some more sympathetic than others; these include the Prudential Building, the Cinerama Dome, Seibu Department Store, Beverly Hilton, Bullock's Pasadena, and Bullock's Westwood.

Given the previous demolitions of Welton Becket buildings, alterations of extant buildings, and the proposed demolition of the Sports Arena, a cumulatively considerable impact resulting from the diminution of Welton Becket's extant and intact body of work is projected under the Preferred Project.

Archaeological Resources

Construction of the Project and associated underground parking lot would require excavation down to approximately 40 feet. Grading and excavations could encounter archaeological resources and disturbance of significant archaeological resources would result in a significant impact prior to implementation of Mitigation Measure ARC-1.

Paleontological Resources

Construction of the Project and associated underground parking lot would require excavation down to approximately 40 feet. Excavations to this depth would pass through Quaternary older alluvium and likely encounter Fernando Formation bedrock, both of which are considered to be highly sensitive for paleontological resources. Disturbance of significant paleontological resources would result in a significant impact prior to implementation of Mitigation Measure PR-1.

3.3.2 Mitigation Measures

Historic Resources

The following mitigation measures are proposed to help mitigate the significant impact of demolishing the Parker Center building:

HR-3: The Historic American Buildings Survey/American Landscapes Survey (HABS/HALS) documentation shall be deposited with the Library of Congress, Los Angeles Public Library, Los Angeles Conservancy, and Los Angeles Police History Museum within a month of its completion.

HR-5: Based on the HABS/HALS documentation, the City shall create a display interpreting the building's significance and displaying it in the public spaces of the building within a month of the issuance of the Certificate of Occupancy.

HR-6: The City shall document Parker Center according to HABS/HALS guidelines before demolition takes place.

HR-7: The City shall incorporate Parker Center's original public art pieces, "Theme Mural of Los Angeles" and "Family Group," into the design and setting of the new

building or the police headquarters building on 1st Street. These public art elements shall be installed at the time of issuance of the Certificate of Occupancy.

Archaeological Resources

The following mitigation measure would ensure that no significant impact to archaeological resources would occur.

ARC-1: A qualified professional archaeologist shall monitor all initial phase of ground disturbing activities of the Project. If buried cultural resources — such as flaked or ground stone, historic debris, building foundations, or non-human bone — are discovered during ground-disturbing activities, work shall stop in that area and within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. Treatment measures typically include: development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation. A report of findings shall be prepared, and recovered materials curated, if needed, in an approved facility. If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed by previous construction or are unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated.

Paleontological Resources

The following mitigation measure would ensure that no significant impact to paleontological resources would occur.

PR-1: A qualified vertebrate paleontologist shall be retained by the City or Project proponent to determine areas that shall require paleontological monitoring during initial ground disturbance. The location of construction activities, especially excavation of the proposed parking garage and optional pedestrian tunnel, likely to encounter subsurface sediments with high paleontological sensitivity shall be determined by the qualified paleontologist upon review of Project excavation and grading plans. Very shallow surficial excavations, less than 5 feet in depth, within areas of previous disturbance or areas of Quaternary younger alluvial deposits shall be monitored on a part-time basis to ensure that underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring.

If excavations for the Project take place in Quaternary older alluvial deposits or within Fernando Formation bedrock these excavations shall be monitored on a fulltime basis by a qualified paleontological monitor under the supervision of the qualified paleontologist. This paleontological resource monitoring shall include inspection of exposed rock units during active excavations within the geologically sensitive sediments. Monitoring may be reduced if some of the potentially fossiliferous units described herein are determined upon exposure and examination by qualified paleontologic personnel to have low potential to contain fossil resources.

The paleontologic monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily divert grading away from exposed fossils in order to professionally and efficiently recover the fossil specimens and collect associated data. All efforts to avoid delays in project schedules shall be made. To prevent construction delays, paleontological monitors shall be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment shall include handheld global positioning system receivers, digital cameras, and cell phones, as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (awls, hammers, chisels, shovels, etc.), and plaster kits. At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis.

Fossils collected, if any, shall be transported to a paleontological laboratory for processing where they shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility (such as the Natural History Museum of Los Angeles County).

Following analysis, a Report of Findings with an appended itemized inventory of specimens shall be prepared. The report and inventory, when submitted to the appropriate lead agency along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts on paleontological resources.

3.3.3 Findings

For the above impacts to cultural resources, the following finding is made:

- ☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- ☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency
- ☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The potential impacts to cultural resources from the proposed Los Angeles Street Civic Building Project are found to be:

- ☒ Significant ☐ Not Significant

3.3.4 Rationale

Impacts associated with Project construction would be mitigated with implementation of the above listed mitigation measures; however, these mitigation measures cannot reduce the impact

of demolishing the Parker Center building. No additional mitigation can reduce this impact to a less-than-significant level and meet the Project objectives. While other alternatives analyzed in the EIR would result in reduced impacts to the Parker Center building, the Preferred Project would best meet the Project objectives and is the most cost effective alternative considered.

3.3.5 References

Section 4.3 of the Draft EIR addresses the Project's cultural resources impacts.

3.4 Geology and Soils

3.4.1 Description of Potential Effects

The Preferred Project would require various site grading and construction activities after demolition of the Parker Center building. The geologic and seismic hazards identified for the Project study area would be reduced by employing required standard engineering practices, including California Building Code standards, in the design and construction of the Preferred Project. Proposed structures, including the optional tunnel, would be designed to meet all applicable design and building engineering practices. Nonetheless, due to the location of the Project site within a seismically active region, potential impacts prior to the mitigation would be significant.

3.4.2 Mitigation Measures

The following mitigation measure is based on the August 2012 technical memorandum, which provided a review of applicability of mitigation measures included in the 2004 preliminary geotechnical report aimed at ensuring seismic safety at the site.

G-1: Construction and structural design of the Project shall comply with all of the geotechnical recommendations, including design measures, provided in the geotechnical engineering report prepared for the Project as described below:

- The proposed Project shall follow the August 2004 geotechnical report's general recommendation of new structures being founded on spread footing foundations and/or Cast-In-Drilled-Hole (CIDH) pile foundations. The specifications for Cast-in-Drilled Hole Pile Construction, Retaining Walls, Slab-on-Grade, and Cement and Asphalt Pavements shall be followed where applicable under all build alternatives.
- Under the proposed Project, where applicable, the existing Parker Center foundation walls shall be structurally evaluated to determine their capability to resist unbalanced earth loads that will occur as the result of adjacent excavation, and shoring shall be installed to provide lateral support where needed.
- The proposed Project shall follow the specifications in the August 2004 geotechnical report regarding Site Preparation and Earthwork, where applicable.
- The general specification for Structure Foundations, as described in the August 2004 geotechnical report, will be considered appropriate, with probable minor modifications to minimum sizes and total expected settlement. The given soil

specifications, such as allowable bearing pressures and coefficients of friction, shall be similar to those used for the proposed Project.

3.4.3 Findings

For the above impacts to geology and soils, the following finding is made:

- ☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- ☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency
- ☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The potential impacts to geology and soils from the proposed Los Angeles Street Civic Building Project are found to be:

- | | |
|--------------------------------------|---|
| <input type="checkbox"/> Significant | <input checked="" type="checkbox"/> Not Significant |
|--------------------------------------|---|

3.4.4 Rationale

The Project is located in a seismically active region, and risks posed by earthquakes generally apply to any structure located in southern California, in the event that a major seismic event, standard building practices and implementation of Mitigation Measure G-1 would ensure that the proposed Project is designed and constructed in accordance with appropriate seismic protections prescribed for the site's specific geotechnical characteristics. Accordingly, Mitigation Measure G-1 would ensure that potential impacts associated with seismic activity are less than significant.

3.4.5 References

Section 4.4 of the Draft EIR addresses the Project's geologic impacts.

3.5 Hazards and Hazardous Materials

3.5.1 Description of Potential Effects

Required excavation of the Parker Center foundation and associated grading activities pose a risk of upsetting potentially contaminated soils given the historic industrial uses of the Project site. Similarly, these activities pose a risk of encountering potentially contaminated groundwater. Removal of contaminated soil and groundwater poses a risk to construction workers and the general population if improperly managed. Finally, given the age of the Parker Center building, many of the original materials used to construct the Parker Center building are

likely to contain asbestos and lead-based paints. Demolition of the building would pose a risk of upsetting these hazardous materials.

3.5.2 Mitigation Measures

The following mitigation measures would reduce potential impacts related to demolition of the Parker Center building and construction of the new Los Angeles Street Civic Building:

Soil Contamination

HM-1: Soils that have visible staining or an odor shall first be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) or other field equipment for volatile components, which require additional considerations in their handling. Soil with OVA readings exceeding 50 parts per million (ppm) volatile organic compounds (probe held 3 inches from the excavated soil face), or which is visibly stained or has a detectable petrochemical odor shall be stockpiled by the contractor separately from non-contaminated soils. The stockpiles shall be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6 millimeter nominal thickness and tested at 100 psi strength). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids.

HM-2: The soil shall then be sampled in a random and representative manner. To establish waste classification, samples shall be analyzed for total recoverable petroleum hydrocarbons (TRPH); volatile organic compounds (VOCs); total petroleum hydrocarbons (TPH) as gasoline or diesel, if these fuels are found in the area; Title 22 heavy metals; reactivity (pH); corrosivity; and toxicity. The number of samples shall depend upon the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity shall determine the amount of soil that can be stockpiled.

HM-3: If VOCs are present at concentrations exceeding 50 ppm, a permit from the South Coast Air Quality Management District (SCAQMD) shall be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The contractor shall obtain all necessary permits.

HM-4: Suspected contaminated soil samples shall be taken to a state-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry in accordance with appropriate testing methods. Materials with elevated levels of TRPH, metals or other regulated contaminants shall require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling.

HM-5: Any contaminated material (soil, asphalt, railroad ballast, concrete, or debris) that is to be hauled off-site and is considered a "waste product" shall be classified as hazardous or nonhazardous waste under all criteria by both state and federal codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest shall be prepared by the contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the

soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility shall be used if no hazardous constituents are present above their respective action levels.

Groundwater Contamination

HM-6: In the event groundwater is encountered during construction, dewatering shall be minimized, sufficient to remove interior or nuisance water from structures. Sampling ports shall be provided in the dewatering system. The produced water shall be required to be temporarily stored in large Baker-type tanks and analyzed by a state-certified environmental laboratory selected by the contractor. If the groundwater quality falls within guidelines established by the City Department of Public Works, Bureau of Sanitation, a permit shall be obtained to discharge the water into a nearby sewer.

HM-7: If hydrocarbon or other water contamination precludes this, the contaminated groundwater water shall be treated onsite (such as in an oil-water separator) or hauled off-site for treatment and disposal in accordance with applicable regulations by a licensed professional.

Asbestos Containing Materials and Lead-Based Paint

HM-8: Prior to demolition activities, all structures within the Project site shall be surveyed for asbestos-containing materials (ACMs) and lead-based paint by a licensed professional. All tests shall be performed in accordance with generally accepted testing laboratory methods. Based on lab test results, appropriate measures for handling, removal, and disposal of these materials shall be developed as part of the survey investigation. Any demolition activities that would remove or disturb these materials shall implement the developed measures in accordance with applicable regulations. As required by law, the abatement contractor shall be a licensed professional.

3.5.3 Findings

For the above impacts to hazards and hazardous materials, the following finding is made:

- ☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- ☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency
- ☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The potential impacts to hazards and hazardous materials from the operation of the Preferred Los Angeles Street Civic Building Project are found to be:

- | | |
|--------------------------------------|---|
| <input type="checkbox"/> Significant | <input checked="" type="checkbox"/> Not Significant |
|--------------------------------------|---|

3.5.4 Rationale

While construction on the site of the Parker Center building has potential to encounter hazardous materials in excavated soils, groundwater, or in the materials of the demolished Parker Center building, Mitigation Measures HM-1 through HM-8 would ensure that, if encountered, these hazardous materials are handled appropriately to minimize the risk of exposure to construction workers and the general population. With mitigation, these impacts would be less than significant.

3.5.5 References

Section 4.5 of the Draft EIR addresses the Project's hazardous waste and materials impacts.

3.6 Land Use and Planning

3.6.1 Description of Potential Effects

The Preferred Project would adhere to all applicable City of Los Angeles planning and zoning requirements and approvals. However, because the Preferred Project would demolish the Parker Center building, an historic resource, the Project would conflict with Policies 10-2.1, 10-2.6, 10-2.7, and 10-2.8 of the Central City Community Plan, which seek to promote preservation and reuse of historic buildings. This conflict with Community Plan policies would be a significant and unavoidable impact. In addition, the removal of the historic parking structure on the east side of Judge John Aiso Street to support the future development of the Art Park, would have the potential to result in cumulatively considerable impacts related to consistency with land use policies that address the preservation or reuse of historic resources. Therefore, the Preferred Project and the recent and foreseeable projects in the study area would result in a cumulatively considerable contribution to a significant cumulative effect related to land use.

3.6.2 Mitigation Measures

No feasible mitigation measures were identified that would address the resulting impacts and meet Project objectives.

3.6.3 Findings

For the above impacts to land use and planning, the following finding is made:

- ☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- ☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

- ☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The potential impacts to land use and planning from the operation of the proposed Los Angeles Street Civic Building Project are found to be:

- ☐ Significant ☐ Not Significant

3.6.4 Rationale

Impacts associated with demolition of the historic Parker Center building are unavoidable and there are no feasible mitigation measures to reduce this land use impact to a less-than-significant level. While other alternatives analyzed in the EIR would avoid this impact, the Preferred Project would best meet the Project objectives and is the most cost effective alternative considered. Through full demolition of the Parker Center building and construction of a new office building, various other planning objectives of the Community Plan can be addressed such as providing pedestrian connections between the Civic Center area and the Little Tokyo community, meeting the parking requirements under current zoning, and would allow for greater consolidation of City offices into a single building allowing the City to save funds long term by reducing the City's lease payment burden.

3.6.5 References

Section 4.6 of the Draft EIR addresses the Project's land use and planning impacts.

3.7 Noise and Vibration

No significant or potentially significant impacts related to noise and vibration were identified in Section 4.7 of the Draft EIR.

3.8 Transportation and Traffic

3.8.1 Description of Potential Effects

Operation of the Project would result in a substantial projected (2020) increase in V/C ratio at six intersections. Based on LADOT's significant impact thresholds, the Preferred Project would result in a significant traffic impact at the following intersections under the future with Project condition:

- Los Angeles Street and Temple Street
- Judge John Aiso Street and Temple Street
- Alameda Street and Temple Street
- Main Street and 1st Street
- Los Angeles Street and 1st Street
- Judge John Aiso Street/San Pedro Street and 1st Street

In addition, based on LADOT's significant impact thresholds, the Preferred Project would result in a significant traffic impact at the following intersection under the existing with Project condition.

- Los Angeles Street and Temple Street

In addition, the Preferred Project would also result in more intersections operating with a deteriorated LOS and would result in one intersection operating at LOS E. With proposed mitigation measures, the Project's impacts to six study intersections would be reduced; however, the Project would continue to result in a deteriorated LOS at five of the six intersections when compared to the Future without Project conditions. Accordingly, after mitigation measures, the Project would result in a cumulatively considerable contribution to a significant cumulative traffic impact.

3.8.2 Mitigation Measures

Under the Future with Project condition, six of the study intersections would be significantly affected. With implementation of the mitigation measures identified below, two of the six significantly affected study intersections would be reduced to a less-than-significant level with the recommended traffic demand management (TDM) measures. However, the following four intersections would continue to be significantly affected with implementation of proposed mitigation measures:

- Los Angeles Street and Temple Street
- Alameda Street and Temple Street
- Los Angeles Street & 1st Street
- Judge John Aliso Street/San Pedro Street & 1st Street

There is one significantly affected intersection under the Existing with Project condition. After implementation of Mitigation Measures TRANS-1 through TRANS-3, the Project traffic impact at the intersection of Los Angeles Street and Temple Street would remain significant.

TRANS-1: Implement comprehensive TDM and transit connectivity strategies.

The applicant is proposing to implement comprehensive TDM and transit connectivity strategies in order to reduce additional Project vehicle trips that would minimize traffic related impacts of the Project. The TDM plan will promote the City's policies through strategies that reduce vehicular use by Project employees and other users of the site (e.g. visitors) during peak periods to include transit and pedestrian-friendly amenities such as safe and walkable sidewalks.

It should be noted that a preliminary TDM and transit connectivity plan would need to be submitted to LADOT for approval prior to the issuance of the Project's first building permit, and a final TDM plan must be prepared and approved by LADOT prior to the issuance of the Project's first certificate of occupancy. The goals of these plans would need to be identified in the final TDM plan or site design.

- **Site Improvements** - The design and operation of the site to the extent feasible shall be designed into the Project to emphasize:

- A bicycle, transit, and pedestrian friendly environment.
- Preferential loading and unloading for carpools, high-occupancy vehicles (HOV), and taxis makes it more convenient and attractive to passengers.
- Wayfinding signage guides that direct people to different elements of a site.
- Carpool and vanpool parking shall be closest to the entrance of a building or on the first floor of a garage or structure to reward participants.
- Bicycle parking shall be convenient, plentiful, well lit, and secure.
- Shower and locker facilities are an important part of the decision for an employee to bike to work.
- Enhanced pedestrian and bicycle pathways for convenient, direct, and secure connections.
- Provision of a self-service bicycle repair area and shared tools for employees.
- Coordinate with LADOT to provide space for a future Integrated Mobility Hub (see TRANS-2)

It must be emphasized that integrating non-auto oriented improvements into the heart of the site rather than off to the side or in a remote corner are paramount to their success. Parking for bicycles shall be convenient and near the front door to facilities and be plentiful and well lit.

- **Car-Sharing and Short Term Car Rental** – Provide on demand access to a fleet of cars for short duration or unexpected trips and provide a minimum of five spaces for a shared car program. These programs reduce the need for individuals to own a car or perhaps a second one. They would enhance the transit oriented nature of the Project because it would allow individuals working and shopping at the site to rely on transit with the knowledge that an automobile is available with relative ease for those trips where transit or other modes are impractical. These programs save costs to individuals and businesses and could reduce the parking demand of the Project.
- **Bike Sharing** – Provide a bike sharing program. With bike sharing, individuals have access to a shared fleet of bicycles on an as-needed basis. It provides a good alternative to autos and because the regional bus fleet and rail systems are bike accessible, it provides a link to transit on both ends of a trip. An added benefit is reduced emissions due to fewer vehicle trips.
- **Transportation Coordinator** – Provide a transportation coordinator (TC), which is a permanent on-site staff position assigned to administer the requirements of a TDM program. Under this strategy, a transportation management association (TMA) shall be formed onsite or the Project could become a part of an existing TMA in the area that would help in promoting awareness of the available TDM strategies and creating Transportation Management Plans (TMP) for the employees and patrons of the site.
- **Transportation Information Center** – Provide a Transportation Information Center (TIC), which is a centrally-located commuter information center where both the employees and visitors can obtain information regarding commute programs, and individuals could obtain real-time information for planning travel without using

an automobile. Strategically placed kiosks can provide trip planning and real time bus and train arrival information for users. Providing real-time transit information allows users to know exactly when the next bus or train will arrive and is an important tool in enhancing transit system connectivity.

- **Transit, Bike, and Walk Promotions and Information Materials** – This shall include a commuter information packet (CIP), a commuter benefits brochure that contains complete information about various transportation benefits available to individuals, transportation/transit options, HOV programs and discounts, bicycling amenities, transportation subsidies, and other elements that may be available. The CIP shall be written in multiple languages such as English, Spanish, and Chinese. The CIP shall be distributed to tenant employees, other building workers and occupants and at promotional events.
- **Tenant Participation** – Under this strategy, the transportation coordinator shall facilitate tenant and employee awareness and participation in the TMP by distributing the information to tenants at least once each year.
- **Carpooling and Rideshare Matching Opportunities** – This strategy shall coordinate ridesharing programs among various building tenants and their employees, provide ride-match services within the building or engage other ride-match facilitators (such as its tenants) to provide this service. It could be applied two different ways. One method is to make available “on the spot” ridesharing. This strategy maximizes trip flexibility for the individual because they do not need to make long term plans and commitments. There are a number of internet-based programs that could be used to match the mobility needs of travelers with drivers. The more traditional method would be to have the TMA provide an online daily and/or long-term commute ride-matching service to match interested patrons with carpools and vanpools. The rideshare matching services could also be extended to other employers in close proximity to the Project site.
- **Guaranteed Ride Home Program** – This strategy provides a guaranteed ride home program for (occupants/employees) who use a commute mode other than driving. Employers may establish their own program or contract this service with a public agency or private contractor.
- **Transit Pass Sales** – Under this strategy employers or a central management operator can contract with the Metro to become authorized to directly sell transit passes to their on-site employees. In addition they could provide transportation subsidies to building occupants/employees who commute via non-motorized or non-single occupancy vehicle modes.
- **Commuter Benefits** – This strategy, pursuant to Internal Revenue Code Section 132 (f), states that employers should arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees.
- **Flexible/Alternative Work Schedules and Telecommuting Programs** – With this strategy, employers would allow employees to work flexible and alternative work schedules so that their arrival and departure to the site varies to reduce trips during peak periods. Telecommuting eliminates any trips to the site since the employee would be working off-site.

- **Expanded DASH Service** – Provide additional service and/or capacity to the DASH downtown system via new routes to the Project site. Contributions could be in the form of the purchase of new DASH vehicles or subsidy of service for a fixed period of time.
- **Taxi Services** – Provide taxi services. Taxis provide on-demand mobility for short and medium length trips. Expanding the City’s “hail-a-taxi” demonstration program to the Project site and surrounding area would provide convenient mobility alternatives for unscheduled or quick trips. In addition, taxis could and should be equipped to accept regional transit fare cards such as Metro TAP smart card technology. A single method of fare payment would greatly enhance non-auto oriented trip choices. Taxi services can also complement the guaranteed ride home program.

TRANS-2: Integrated Mobility Hub.

LADOT has been awarded grant funds to implement shared-vehicle stations within Downtown Los Angeles. This program, known as the Integrated Mobility Hubs project, would provide secure bike parking and a fleet of shared bikes and cars in an attempt to enhance urban mobility and serve as an extension of the current transportation network. The program can provide a form of “on-demand” transportation supplying Downtown-area users with a convenient and reliable option for one or more of the legs of their commute while being environmentally friendly and furthering greenhouse gas emission reduction goals. For many, transit use is not often the most convenient choice because station endpoints are often beyond desirable walking distances to a traveler’s final destination. Integrated mobility hubs provide an opportunity to customize the first and last mile experience by providing the end-user with vehicle options that would meet their particular trip needs for that day. Providing more first or last mile mobility choices can lead to increased use of public transit and introduce new transit riders.

Given the project’s close proximity to Union Station, the Metro Gold Line Little Tokyo/Arts District station and several Metro bus stops, the project location is well suited for increased use of public transit by occupants of the project. To support the goals of the project’s TDM plan and to expand the City’s program, the project shall coordinate with LADOT to provide space for a Mobility Hub in a convenient location within or near the project site. The project can also potentially provide on-site parking spaces for the shared-car component of the Mobility Hubs program. The project shall also provide space that would accommodate bicycle parking, bicycle lockers, and shared bicycles. LADOT is currently working on an operating plan and assessment study for the Mobility Hubs project that will include specific sites, designs and blueprints for Mobility Hub stations. The results of this study will assist in determining the appropriate location and space needed to accommodate a Mobility Hub at the project site.

TRANS-3: Transit/Pedestrian Enhancements

The project shall provide a pedestrian friendly environment through sidewalk pavement reconstruction/improvements, and improved amenities, such as landscaping and shading, particularly along the sidewalks.

3.8.3 Findings

For the above impacts to transportation and traffic, the following finding is made:

- ☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- ☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency
- ☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The potential impacts to transportation and traffic from the operation of the proposed Los Angeles Street Civic Building Project are found to be:

- ☐ Significant ☐ Not Significant

3.8.4 Rationale

Traffic impacts associated with operation of the Project are unavoidable and there are no feasible mitigation measures to fully reduce impacts at all study intersections to a less than significant level, though two of the six intersections experiencing significant impacts would be mitigated to less-than-significant levels. While other alternatives analyzed in the EIR would reduce this impact, the Preferred Project would best meet the Project objectives and is the most cost effective alternative considered.

3.8.5 References

Section 4.8 of the Draft EIR and Chapter 2 of the Final EIR addresses the Project's transportation and traffic impacts.

3.9 Utilities, Service Systems and Energy

No significant or potentially significant impacts to utilities, service systems, or energy were identified in Section 3.9 of the Draft EIR.

4 Alternatives Considered and Preferred Project

Section 15126.6 of the CEQA Guidelines requires an evaluation of the comparative effects of a reasonable range of alternatives to the project that would feasibly attain most of the project's basic objectives and would avoid or substantially lessen any of the significant impacts of the project. A feasible alternative is one that can be accomplished successfully in a reasonable period of time, taking into consideration economic, legal, social, and technological factors. The range of alternatives is governed by the "rule of reason" that requires the EIR to set forth only

those alternatives necessary to permit a reasonable choice. Chapter 5, Comparison of Alternatives, of the Draft EIR discusses three Project alternatives and the No Project alternative that were carried forward in detailed analyses. Draft EIR Chapter 5 also discussed several alternatives that were considered but not carried forward.

The Los Angeles Department of Public Works, Bureau of Engineering has the following objectives for the Los Angeles Street Civic Building Project:

1. Reduce travel time for City employees during the workday by relocating City staff closer to City Hall.
6. Improve customer service by consolidating City services that are dependent upon each other into one building that is in close proximity to other City services.
7. Support City of Los Angeles sustainability initiatives by rehabilitating or constructing a building that meets the City's Green Building Code.
8. Re-activate a City-owned property that is currently underutilized.
9. Ensure the health and safety of City employees by providing a work environment that meets current environmental, seismic, and fire/life safety regulations.

4.1 Alternatives Considered but Not Analyzed in the Draft EIR

Alternatives that were considered but not carried forward in the Draft EIR included a slender in-fill building, the Toriumi Plaza Site on the northwest corner of the block, a low-scale commercial space along Judge John Aiso Street rather than on the Project site, and an off-site building, such as the federal government-owned property at First Street and Broadway. As explained in the Draft EIR, none of these suggested locations or designs were determined to be feasible alternatives, as defined in CEQA and, therefore, were not required to be analyzed in detail in the Draft EIR.

In May 2015, Council District 14 issued a motion instructing LABOE to prepare additional design studies of a new alternative that would preserve the Parker Center tower while also providing the required square footage necessary to meet the objectives of the Project. Substantial design study and analysis of potential alternatives took place over the next year, the result of which was the development of a new alternative with the following basic elements:

- Similar to Alternative B2, the new concept included an addition to the Parker Center tower that would be approximately 450 feet in height.
- The gross square footage would be approximately 818,600 gross square feet with a net usable area of 588,000 net square feet consistent with Alternative B3.
- An 819-parking-space lot, which would be above ground and would occupy the first 6 levels of the high-rise building.
- The anticipated cost of this option would be approximately \$621,000,000.

While the new design concept would meet space requirements identified by the City, this alternative was rejected from further consideration because of the following:

1. Significant unavoidable impacts on cultural resources would remain including effects that would diminish the eligibility of the Parker Center building for listing on the National Register of Historic Places.
2. The space and circulation efficiency of the Preferred Project (Alternative B3) was far superior to that of the new design concept. The new design needed to increase its gross square footage considerably to achieve the same useable space as the Preferred Project. This among other inefficiencies and requirements resulted in an increase in cost of approximately \$107,000,000.
3. The Preferred Project (Alternative B3) would provide the best use of the site with a maximized efficiency in space.
4. The new design concept would require an undesirable parking arrangement that would not allow for first-floor commercial uses. In addition, the new design required several floors of above grade parking.
5. Circulation within the building would be inefficient due to the need for additional elevator banks, vertical mechanical chases, corridors, and stairs.
6. The overall cost of the new design would be restrictive given the City's budget constraints. It would be the least cost efficient alternative among the range of alternatives studied while the Preferred Project (Alternative B3) is the most cost effective alternative because it provides maximum floor space efficiency, the best dollars spent to square footage ratio, and the least long-term maintenance cost.
7. The Preferred Project (Alternative B3) has most support among local residents and businesses because it affords maximum connectivity between Little Tokyo and the Civic Center while allowing for commercial development on the street level. The new design does not afford such opportunities.

4.2 Alternatives Analyzed in the Draft EIR

Three build alternatives and the No Project Alternative were analyzed in detail in the Draft EIR. The relative impacts of each alternative were compared to the Preferred Project. Under each build alternative, office and commercial space, and a childcare facility are proposed in various configurations and sizes depending upon the alternative. These alternatives represent conceptual designs and, therefore, some flexibility within each conceptual alternative is anticipated in order to meet the future needs of the City. The maximum development that could be allowed under each build alternative is described in detail in Chapter 3.0, Project Description. The following discussion is a brief summary of each of the alternatives analyzed in this EIR.

Alternative A – No Project

The No Project Alternative assumes that the Project would not be approved and no new development would occur within the Project site. Thus, the physical conditions of the Project site would largely remain as they are today. No new buildings would be constructed, and the existing Parker Center Building would remain unimproved and vacant.

Although the No Project Alternative would result in the fewest environmental impacts, it was not selected because it would not meet the purpose and objectives of the Project.

Alternative B1 – Rehabilitation

Under Alternative B1, the existing Parker Center building would be rehabilitated with various improvements including seismic retrofitting, fire safety improvements, and upgrades to ensure energy efficiency. Americans with Disabilities Act (ADA) upgrades would be implemented. The existing 319,048 gross square-foot building would be reconfigured to provide office space for City employees, and rentable commercial space. The existing parking garage would be expanded to provide approximately 137 parking spaces. Alternative B1 also includes an optional inter-building tunnel that would connect City Hall East to the rehabilitated Civic Building.

While this alternative would meet all of the Project objectives, when compared to Alternative B2 and the Preferred Project, this alternative would satisfy Objectives 1 and 2 to a lesser extent because there would be less available floor area to relocate City services to the new building; thereby, leaving approximately 2,990 City employees scattered throughout the City (3,865 employees to be relocated minus 875 employees under Alternative B1).

Alternative B2 – Partial Demolition, Rehabilitation, and Addition

Alternative B2 would include rehabilitation of a majority of the Parker Center building, similar to that of Alternative B1, as well as demolition of the Parker Center jail, which would be replaced with an expansion building. Combined with the existing Parker Center building, the expansion would expand the gross area to approximately 522,255 square feet, of which approximately 338,684 square feet would be usable for office space and approximately 16,500 square feet would be for commercial space and a child care facility. A connection between the expansion and the Parker Center building would be constructed. Approximately 328 parking spaces would be provided with this alternative. The expansion building would have a maximum height of approximately 200 feet. Alternative B2 also includes an optional inter-building tunnel that would connect City Hall East to the rehabilitated Civic Building.

Similar to Alternative B1, Alternative B2 would satisfy all of the Project objectives, but to a lesser extent than the Preferred Project, because of the limited floor area. While a greater number of City employees could be relocated to the Project site under Alternative B2 than under Alternative B1, it is anticipated that approximately 2,090 City employees would remain at other locations in the City under this alternative (3,865 employees to be relocated minus 1,775 employees under Alternative B1).

4.3 Preferred Project

This section presents the Preferred Project, which is the proposed Project, including a discussion of the rationale for the selection and the benefits of the Preferred Project. The Preferred Project (described in the EIR as “Alternative B3 – Demolition and Build”) would demolish the existing Parker Center building and construct a new office building, which would consist of approximately 753,730 gross square feet, and approximately 1,173 parking spaces with a maximum height of approximately 450 feet. The Preferred Project would include office and commercial space, and a childcare facility. The proposed 753,730 square feet could be accommodated in one or two buildings on the site. The new building(s) could take on a variety of configurations, but would generally fill the footprint of the existing Parker Center building. Outdoor open space and a

pedestrian connection between City Hall to the west, and the Little Tokyo neighborhood to the east and south would be provided. The Preferred Project also includes an optional inter-building tunnel or bridge that would connect City Hall East to the new Civic Building.

An assessment of the City's space needs was conducted as part of the City of Los Angeles 2009 Strategic Real Estate Plan (Plan). That Plan concluded that a new office building for the consolidation of City offices was needed in order to improve communication, productivity, and synergy. As discussed therein, a 500,000- to 1,000,000-square-foot building¹ on the Parker Center site would accommodate the long-term future needs of the City. A 500,000-square-foot building could include the Personnel Department, Department of General Services, Office of Public Safety, ITA Channel 35, LAPD Internal Affairs, and City Attorney programs. According to the Plan, the advantages of constructing a new Civic Center office building include the following:

- Maximizes operating efficiencies through consolidation;
- Permits optimization of space standards and departmental agencies;
- Includes the planning of new space, thus improving productivity;
- Reduces in-house and consultant asset management expenses;
- Supports the creation of jobs through new construction;
- Is the closest location available within the City Hall/Civic Center complex; and
- Can provide a new image and focal point for the Civic Center, using creative design.

The Preferred Project has the most efficient use of space. Based on the ratio of net to gross square feet, it appears that the alternative with the most efficient use of space is Preferred Project. The ratio of gross to net square footage for each alternative is the following:

- Alternative B1 = 174,331 net square feet / 319,048 gross square feet = 55%
- Alternative B2 = 354,499 net square feet / 522,255 gross square feet = 68%
- Preferred Project = 588,240 net square feet / 753,730 gross square feet = 78%

The Preferred Project would best satisfy the Project objectives as it would provide the greatest amount of space for City employees, providing enough space for up to 2,945 employees, which is closest among the proposed alternatives to meeting the City's projected employee counts of 3,865 employees. In addition, a new building, as proposed under Alternative B3, would provide the most ideal health and safety improvements to the Project site (Objective 5) and comply with the City's Green Building Code (Objective 3). In addition, the Preferred Project provides greater flexibility with respect to office layouts. The floor plate under the Preferred Project would be large enough to provide both private offices and open workstations at a minimum of four deep in an uninterrupted manner. Considering the continually changing work environment, the City considers office space flexibility to be important when planning for the future. Alternative B1 has a narrower floor plate that does not support space efficiency. Alternative B2 has greater space efficiency than Alternative B1, but is limited when compared to the Preferred Project (Alternative B3). Overall, the Preferred Project supports the most efficient office space of the three build alternatives. Lastly, the Preferred Project would have a greater floor-area ratio than the other build alternatives and, as such, would be of the highest and best economic use for the property. The following detail the cost benefits of the Preferred Project:

- By virtue of increased day-time headcounts in a concentrated location, the Preferred Project could be a significant economic catalyst to help bolster a renovated mall and Little Tokyo. Demolition as opposed to rehabilitating the existing Parker Center building would avoid the possibility of creating blight in the area.
- Co-location could result in reduced transit (such as DASH) and travel time between locations, which would also reduce fleet and fuel use; and
- The Preferred Project would have the lowest overall cost per square-foot of any of the Alternatives considered:
 - Alternative B1: \$1,234 per square foot
 - Alternative B2: \$917 per square foot
 - Alternative B3: \$807 per square foot

Accordingly, while providing the most efficient use of space, the Preferred Project would also provide the greatest cost efficiency, thereby maximizing the use of the property.

Regarding energy efficiency, the energy loss factor (i.e., amount of energy lost in transmission) on the existing building is high. Alternative B1 would result in a loss of nearly 43 percent of its gross to net area, while the Preferred Project would yield an 18 percent loss of its gross to net area. In addition, using the Commercial Building Energy Consumption Survey's (CBECS) Energy Use Intensity (EUI) value for buildings greater than 100,000 square feet, it is estimated that the existing Parker Center building would consume roughly 105 kilowatt hours (kWh) of energy per square foot of gross floor area. Using this as a rough estimate, it can be assumed that by maintaining the existing building and existing leased property throughout the City, rather than consolidating City offices into a single larger building, existing dispersed offices use a combined 120 million kWhs each year while the Preferred Project would use approximately 78 million kWhs per year. Accordingly, the Preferred Project would provide the most energy efficient use of space of any of the alternatives analyzed in the Draft EIR.

4.4 Environmentally Superior Alternative

Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the No Project Alternative would result in fewer impacts on the existing environment. However, Section 15126.6(e)(2) of the State CEQA Guidelines states if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the analysis presented in the EIR the environmentally superior alternative is Alternative B1, Rehabilitation. However, Alternative B1 would be the least effective alternative at satisfying the Project objectives because it would provide the least amount of floor area to relocate City services. The Preferred Project would best satisfy the Project objectives because the greatest number of City employees could be relocated under this alternative and a new building would provide better fire-life safety and seismic safety features and comply with the City's Green Building Code.

In addition, the Preferred Project provides greater flexibility with respect to office layouts. The floor plate under the Preferred Project would be large enough to provide both private offices

and open workstations at a minimum of four deep in an uninterrupted manner. Considering the continually changing work environment, the City considers office space flexibility to be important when planning for the future. Alternative B1 has a narrower floor plate that does not support space efficiency. Alternative B2 has greater space efficiency than Alternative B1, but is limited when compared to Alternative B3. Overall, the Preferred Project supports the most efficient office space of the three build alternatives. Lastly, the Preferred Project would have a greater floor-area ratio than the other build alternatives and, as such, would be more cost-efficient to operate.

5 Statement of Overriding Considerations

As described in Section 2, the Preferred Project would result in the following unavoidable significant adverse impacts after mitigation:

- **Aesthetics:** The Parker Center building is considered a visual/historic resource. The Preferred Project would result in demolition of the Parker Center resource, a significant and unavoidable impact. In addition, under the Preferred Project, the proposed Civic Center building would create a new source of shade/shadow on Bowron Square, a significant and unavoidable impact.
- **Air Quality and Greenhouse Gas Emissions:** While construction emissions of reactive organic compounds (ROC), nitrous oxide (NO_x), and particulate matter (PM_{2.5}), could be mitigated to less-than-significant levels, construction of the optional inter-building circulation tunnel would result in substantial emissions of ROC, NO_x, and PM_{2.5} that cannot be mitigated to less-than-significant levels. In addition, operation of the Preferred Project would result in mobile-source ROC and NO_x pollutant emissions that would exceed SCAQMD thresholds. This impact would be significant and unavoidable.
- **Cultural Resources:** The Parker Center building is considered to be an historical resource and the Preferred Project would result in demolition of this building, a significant unavoidable impact. In addition, demolition of the Parker Center building and replacement with a new civic building would result in indirect impacts to the Los Angeles Civic Center Historic District, because Parker Center would no longer convey its significance as a police facility within the District, resulting in a substantial adverse change in the historic significance of the district, a significant and unavoidable impact.
- **Land Use and Planning:** Because the Parker Center building, an historic building, would be demolished under the Preferred Project, the Project would conflict with land use policies in the Central City Community Plan that promote preservation and reuse of historic buildings. This would be a significant and unavoidable impact.
- **Transportation and Traffic:** Operation of the Project would result in a significant change in volume/capacity (V/C) ratio and level of service (LOS) in the 2020 future scenario at six study intersections: Los Angeles Street/Temple Street interaction, Judge John Aiso Street/Temple Street intersection, Alameda Street/Temple Street intersection, Main Street/1st Street intersection, Los Angeles Street/1st Street intersection, Judge John Aiso Street/San Pedro Street/1st Street intersection. Proposed mitigation measures would reduce impacts to less than significant at two of the six intersections. Impacts at four intersections would be significant and unavoidable.

The below stated reasons summarize the benefits, goals, and objectives of the Project, and provide the rationale for the benefits of the Project. Any one of the overriding considerations of economic, social, and environmental benefits individually would be sufficient to outweigh the adverse environmental impacts of the Project and justify their adoption and certification of the Final EIR.

1. Implementation of the Preferred Project would best meet the City's current office space needs.
2. Implementation of the Preferred Project would afford the opportunity for the Parker Center site to be visually and physically connected and integrated with the surrounding community and provide a more contiguous pedestrian corridor connecting the Civic Center, Little Tokyo community, Grand Park, and Disney Concert Hall.
3. Implementation of the Preferred Project would replace an out-of-date unused building with a new Civic building that would meet City of Los Angeles seismic and fire safety requirements while also achieving City sustainability initiatives and the City's Green Building Code.
4. Implementation of the Preferred Project would allow the City to consolidate many of its civic offices into a single building allowing the City to avoid ongoing lease agreements in various buildings throughout the City. This would provide long-term cost savings to the City and provide City employees with an office building in closer proximity to City Hall affording improved service and efficiency.
5. Implementation of the Preferred Project would provide needed employee parking in the Civic Center area.

Accordingly, the City hereby concludes that the Preferred Project's benefits outweigh and override its unavoidable significant impacts for the reasons stated above. The City reached this decision after having done all of the following: (1) adopted all feasible mitigation measures, (2) rejected as infeasible alternatives to the Project, (3) rejected alternatives that do not fully meet the Project objectives (4) recognized all significant, unavoidable impacts, and (5) balanced the benefits of the Project against its significant and unavoidable impacts.