

APPROVED

JUN 07 2017

BOARD OF RECREATION AND PARK COMMISSIONERS

BOARD REPORT

NO. 17-134 REVISED

DATE June 07, 2017

C.D. 9

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: SOUTH LOS ANGELES WETLANDS PARK – LEASE AGREEMENT WITH THE MUSEUM ASSOCIATES DBA THE LOS ANGELES COUNTY MUSEUM OF ART FOR THE USE OF A PORTION OF THE SOUTH LOS ANGELES WETLANDS FOR THE RENOVATION AND REHABILITATION OF BUILDING 71 AND OPERATION OF PROPOSED MUSEUM; CONSIDERATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT (EIR), FINDINGS, STATEMENT OF OVERRIDING CONSIDERATIONS AND ACCOMPANYING MITIGATION MEASURES, AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE SOUTH LOS ANGELES WETLANDS PARK PROJECT EIR (SCH NO. 2007051122)

AP Diaz

V. Israel

for R. Barajas

N. Williams

H. Fujita



General Manager

Approved ☒

Disapproved ☐

Withdrawn ☐

As Amended ☐

RECOMMENDATIONS

1. Adopt a proposed Resolution, herein included as Attachment 1, authorizing the Department of Recreation and Parks to enter into a thirty-five (35) year Lease (Lease) with the Museum Associates dba the Los Angeles County Museum of Art (LACMA) for the use of a portion of the South Los Angeles Wetlands Park for the renovation and rehabilitation of Building 71 and operation of a proposed Museum in accordance with Charter Section 594(a) and 595;
2. Authorize the Department of Recreation and Parks (RAP) to negotiate the Lease with LACMA for the use of a portion of RAP's South Los Angeles Wetlands Park for the renovation and rehabilitation of Building 71 and operation of a proposed Museum in accordance with Charter Sections 594(a) and 595 and consistent with the terms, improvements, and uses set forth of this Report;
3. Authorize RAP staff and the City Attorney to make any necessary changes to the Lease consistent with the terms, improvements, and uses set forth in this Report;

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4. Authorize the Board President and Secretary to execute the final Lease subject to the approval of the City Attorney as to form, and the approval of the City Council by ordinance; and,
5. Find, pursuant to the State of California Environmental Quality Act (CEQA) Guidelines, in consideration of the whole of the administrative record, that the project was adequately assessed in the previously certified Final Environmental Impact Report (EIR), Findings, Statement of Overriding Considerations and accompanying mitigation measures, and Mitigation Monitoring and Reporting Program for the South Los Angeles Wetlands Park Project EIR (SCH No. 2007051122), all of which are on file in the Board Office; and no subsequent EIR, negative declaration, addendum or other CEQA analysis is required for approval of the project.

SUMMARY

On January 7, 2009, the Board of Recreation and Park Commissioners (Board) approved the acquisition of a nine-acre parcel located at 5413 South Avalon Boulevard for the South Los Angeles Wetlands Park (Park) through Report No. 09-003. Metropolitan Transit Agency (MTA) previously used the site as a bus maintenance and storage yard. The Park currently includes a pocket park, parking lot, and wetlands area completed in 2012. There is also an 84,000 square foot building that was a remnant from the previous bus maintenance and storage yard (Exhibit A). It has been sealed off from the public as RAP searches for funds to complete a hazardous materials abatement and seismic retrofit of the building.

Proposal

Recently, LACMA met with RAP staff to discuss a proposal to manage and operate a museum program at the Park. LACMA is proposing to provide programming for organized museum, cultural, recreational, and community activities. The proposal also includes an offer to repair, retrofit and provide improvements to Building 71 at no cost to RAP. The work will make Building 71 meet current code requirements for seismic, structural, mechanical, electrical, and plumbing systems, and includes any hazardous materials abatement as needed.

LACMA proposes to begin providing museum programming services at designated recreation centers near the South LA Wetlands Park within six months of the execution of the Lease while the repair and retrofit work is being conducted in Building 71. Programming at the Park will be provided within eighteen (18) months of the execution of the Lease.

LACMA has requested a Lease term of not more than thirty-five (35) years. The premises area shall include the entire 84,000 square foot Building 71. There is a shared use area that includes portions of the Park immediately adjacent to the building and the east side parking lot as depicted in Exhibit B.

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Tenant Improvement Schedule

LACMA proposes to initially improve up to 10,000 square feet of space in the building for use for public programming within eighteen (18) months of the execution of the Lease. An additional 13,000 square feet of space in the building (8,500 square feet for additional public programming and 4,500 square feet for a Ranger Station) will be improved within five years after the completion of the initial 10,000 square foot improvement. LACMA may elect to improve another 12,000 square feet of space in the building within ten years of the execution of the Lease for additional public programming space.

All capital costs and all other costs related to such improvements, retrofit and repairs shall be borne by LACMA.

Uses and Operations

LACMA shall use the premises area for the operation of art and culture-related and instructional public programs and ancillary or related uses, including the storage of LACMA's art collection, operation of a restaurant or café, operation of a retail space, and providing recreational and instructional programs to the surrounding communities. LACMA shall use income from the ancillary uses mentioned above only for such purposes that are consistent with the permitted use of the building and only for activities within the Park.

LACMA's proposed public programming component is further described in Exhibit D of the Lease (Attachment 2). The public programming strategy's goal is to realize LACMA's vision of engaging the local community both through compelling public art programs and training initiatives that support residents in becoming paid staff. Programs include Social Justice-themed School Tour and Art-Making; Teen Tour Guide Programs; Intergenerational Weekday and Weekend Programs; and Teaching Assistant Training Programs.

Park Ranger Station

As previously stated, LACMA will improve 4,500 square feet of building space for the installation of a Park Ranger Station. Improvements shall be limited to providing utility (gas, electricity and water) hookups and in ensuring that RAP is able to connect its internal information and technology systems to the electrical and data cable connections of the building. City shall be responsible for any additional capital and other improvements it deems necessary or desires.

LA Philharmonic and Youth Orchestra Los Angeles (YOLA)

LACMA is currently in discussions with the Los Angeles Philharmonic (Philharmonic) concerning the possibility of bringing its YOLA program to the Park. The Philharmonic has been given, at its sole option, until no later than August 31, 2017 to elect to join the building project. Should this occur, LACMA proposes to sublease up to 17,000 ~~additional square feet of the building to the Philharmonic.~~ *square feet of the improved space of the building to the Philharmonic, to be shared with LACMA operations.

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ENVIRONMENTAL IMPACT STATEMENT

RAP staff has determined that the renovation, rehabilitation and reuse of Building 71 under the proposed Lease is substantially the same in concept as Phase II of the original South Los Angeles Wetlands Park project. Therefore, based on substantial evidence from a supplemental environmental review, it was determined that the previously certified Final Environmental Impact Report (FEIR-SCH No. 2007051122) and supporting technical studies (Environmental Documents) adequately assesses the environmental effects of the proposed renovation, rehabilitation and reuse of Building 71 project. On April 8, 2008, City Council certified the Final EIR for the park project and adopted Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program (MMRP), all of which are on file in the Board Office. A Notice of Determination filed with the Los Angeles County Clerk occurred on April 11, 2008.

California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Subsequent or Supplemental EIR is required by the lead agency or by any responsible agency:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR;
2. Substantial changes occur with respect to the circumstances under which the project is being undertaken that will require major revisions in the environmental impact report; or,
3. Previously unknown new information at the time of the certification of the EIR as complete becomes available.

As demonstrated in the supplemental environmental review (Attachment 5), all the environmental impacts from the Phase II renovation, rehabilitation and reuse of Building 71 (Project) under the proposed Lease would be same or substantially similar to those assessed in the certified EIR. RAP staff has determined that:

1. The proposed Project **will not** involve substantial changes in the project scope requiring major revisions in the previous EIR due new significant environmental effects, or an increase in the severity of previously identified significant effects;
2. The circumstances under which the Project is undertaken **will not** require revisions of the previous EIR due new significant environmental effects or an increase in the severity of previously identified significant effects;
3. There is **no** new information of substantial importance showing new significant environmental effects not discussed in the previous EIR, or an increase in the severity of previously examined significant effects;
4. There are **no** mitigation measures or alternatives to the project considerably different from those analyzed in the previous EIR that would substantially reduce one or more significant effects on the environment, but not adopted with the previous EIR.

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Based on this determination, the proposed Project does not meet the requirements for preparation of a Subsequent or Supplemental EIR pursuant to Section 15162 and 15163 of the State CEQA Guidelines for approval of the project.

FISCAL IMPACT STATEMENT

*some minor
There are ~~no~~ anticipated fiscal impacts to RAP's General Fund should the Board approve the execution of the Lease. All costs, with the exception to any additional improvements to the aforementioned Park Ranger Station, will be the responsibility of LACMA. Any costs for the future Park Ranger Station will be requested through the regular budget process.

This Report was prepared by Cid Macaraeg, Sr. Management Analyst II in Real Estate and Asset Management, Planning, Maintenance and Construction Branch.

LIST OF ATTACHMENTS

- 1) Proposed Resolution
- 2) Exhibit D of ~~Draft Lease~~ the Draft Lease
- 3) Exhibit A – Aerial Picture of Project Site
- 4) Exhibit B – Conceptual Site Plan of Shared Space
- 5) Supplemental Environmental Review

RESOLUTION NO. _____

WHEREAS, the Department of Recreation and Parks owns a nine (9) acre park located at 5413 South Avalon Boulevard and commonly known as the South Los Angeles Wetlands Park (Park);

WHEREAS, the Park is comprised of a pocket park area, a wetlands area, and an 84,000 square foot building (Building 71) to be used for park and recreational purposes;

WHEREAS, Building 71 was a remnant from a previous bus maintenance and storage yard and was sealed off from the public due to a need to perform hazardous materials abatement and a seismic retrofit of the building;

WHEREAS, the Museum Associates dba Los Angeles County Museum of Art (LACMA), is a nonprofit public benefit corporation formed for the purpose of serving the public through the collection, conservation, exhibition, and interpretation of significant works of art from a broad range of cultures and historical periods, and the translation of these collections into meaningful educational, aesthetic, intellectual, and cultural experiences for the widest array of audiences;

WHEREAS, LACMA has been devoted to collecting works of art that span both history and geography, in addition to representing Los Angeles's uniquely diverse population, and is a museum of international stature as well as a vital part of Southern California that shares its vast collections through exhibitions, public programs, and research facilities that attract over a million visitors annually, in addition to serving millions through digital initiatives, such as online collections, scholarly catalogues, and interactive engagement through its website;

WHEREAS, LACMA agrees to shares its collections and programs to the residents served by the Park, and, therefore, is providing valuable consideration and will continue to provide such services to the City during the term of a Lease Agreement (Lease) for the use of a portion of the Park further defined as the Premises Area (Exhibit A) and Shared Use Areas (Exhibit B);

WHEREAS, the City and LACMA desire to enter into a Lease for the lease, retrofit, design, development and maintenance of Building 71, which will house museum programs to be created and provided by the LACMA to the general public at Premises and Shared Use Areas of the Park;

WHEREAS, LACMA agrees to provide said services as a public service such that LACMA will use the Premises and Shared Use Areas as a museum (including any use incidental or ancillary thereto), and to provide for the construction of improvements, maintenance and operation of the museum in accordance with the standards set forth herein.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Recreation and Park Commissioners approves the proposed Lease Agreement between LACMA and the City for the use of the Premises and Shared Use areas of the Park for a thirty-five (35) year term; and,

BE, IT FURTHER RESOLVED, that the City Attorney's Office is authorized to make any necessary changes to the Lease, so long as the primary terms remain as described in Board Report; and,

BE, IT FURTHER RESOLVED, the Board President and Secretary are authorized to execute the final Lease, subject to the approval of the City Attorney as to form, and the approval of the City Council by ordinance.

I HEREBY CERTIFY that the foregoing is a full, true and correct copy of a Resolution adopted by the Board of Recreation and Park Commissioners of the City of Los Angeles at its Meeting held on _____, 20__ (Report No. _____)

Armando X. Bencomo, Secretary

Resolution No. _____

EXHIBIT D

Preliminary Public Programming Strategy

LACMA has conceived of a tailored slate of public programs that leverage the unique assets of the South Park neighborhood to fulfill the needs of the community. The museum's two-pronged approach serves residents by not only delivering programs that adults, families, and youth can participate in, but by also offering training opportunities for residents to lead and facilitate programs. This strategy enables LACMA to cultivate a truly collaborative relationship between the museum and neighborhood, one in which the perspectives of residents as both program participants and paid front-line staff help shape this satellite space into a responsive, site-specific organization built for and with the community.

The museum has a long history of working off-site in communities and is cognizant of the sensitivity, care, and expertise required in successfully establishing a presence in a neighborhood that residents embrace and utilize. South Park is an important Los Angeles neighborhood where LACMA can make a tremendous impact. First, it is populous. At over 21,000 people per square mile, it is one of the densest neighborhoods in the County, and the abundance of schools, churches, and community centers in the area reflect this. It is also home to a significant immigrant population. Almost half of the total residents are foreign born and about 30 percent of residents 25 years and older did not graduate high school.

The density, demographic make-up, and challenges of the area have attracted a plethora of programs that community members have access to, such as free health screenings, tax preparation, English language classes, and various drug, alcohol, and domestic violence support groups. While services aimed at addressing basic needs are plentiful, there is a dearth of arts and culture programming. If it does exist, it resembles "arts and crafts-type activities" (in the words of a resident) versus high-quality art programs. Formative feedback from other locals echoes a desire for innovative art programming and access to original works of art, as logistical barriers prohibit easy access to LACMA's main campus.

Additionally, there is an identified need for safe spaces free of gang association where diverse people from the surrounding area can gather. While gang activity in South Los Angeles has diminished from what it once was pre-1992, the existence of gangs is palpable and a factor in how and where residents spend their leisure time. It may not be safe to cross certain boundaries; therefore, community members tend to stay within a narrow radius surrounding their home.

The Wetlands site is largely perceived to be neutral, where people of diverse backgrounds already feel comfortable converging to run, walk, or enjoy a picnic. By implementing best practices in relationship-building, offering a dynamic menu of art programs for all ages, and enlisting residents as partners in delivering these offerings, LACMA is poised to form a strong bond with the residents and fill in the gaps of services in the community.

The suite of programs below realizes the museum's vision in engaging locals both through compelling public art programs and via training initiatives that support residents in becoming paid staff. This cohesive educational strategy will enable regular two-way dialogue between

LACMA and the community that will be critical to the site becoming an essential resource responsive to its constituents.

- Free Social Justice-themed School Tour and Art-making Program

To serve the 9,500 students within a mile of the Wetlands, LACMA will design a program model in which students visit the site multiple times, engaging in close looking at artworks and related art-making. LACMA will develop a thematic social justice curriculum for middle and high school students. By analyzing examples of art from the museum's collection that have been employed as tools for social critique, students will engage in provocative discussion and debate before creating their own artwork that addresses inequalities or injustices that matter most to them or that, perhaps, have personally affected them. This approach aligns with the curriculum at many of the local schools, which currently focuses on social justice themes. Through participating in the program, students will develop a greater understanding of art as a powerful communication tool that can shine a light on silenced issues.

*In year one, LACMA will develop the curriculum of the program and solidify relationships with nearby schools to launch the program in year two.

- Teen Tour Guide Program

The Teen Tour Guide Program is an iteration of LACMA's long-running, successful High School Internship Program. Each year a cohort of teens from the neighborhood will participate, for free, in an intensive training program focused on learning about the museum's collection and art history, strategies for facilitating conversations about art, and public speaking. LACMA considers these teens to be part-time museum paid interns who will receive compensation for their time in the form of a stipend for training and tours given. Upon graduation from the program, these students may then become the site's paid guides, ready to give tours to their peers and the public. Each year, a new cohort of teens will begin their training program and, over time, LACMA will develop a corps of guides from the neighborhood that will serve as the public face of the institution. Through participating in the program, teens gain vital leadership skills, feel a sense of productivity, accomplishment, and contribution to their community, and help audiences personally connect to the artwork on view.

*In year one, LACMA will develop the curriculum of the program and recruit applicants to commence training in year two.

- Intergenerational Weekday and Weekend Programs

LACMA will develop a series of free public programs designed for caregivers and their children to make and discuss art together. Weekday programs will consist of formal workshops for caregivers of toddler and pre-school age children focused on strategies for engaging with art at the critical early childhood stage. Weekend programs will serve all ages with a drop-in format that encourages families to stay as long as they like and

choose their activities. The art projects are open-ended to promote creativity and scalable to allow older children to take it in a direction a younger participant may not. An emphasis on interesting art-making materials, not accessible at stores in the neighborhood (feedback we heard from locals), will ignite wonder in the artistic process and expand creative possibilities. In addition to art-making, families may also attend tours led by graduates from the Teen Tour Guide Program. Many of the activities offered on these days will give participants an opportunity to discover art as a means to give voice to issues in their community or social issues that are of concern to residents.

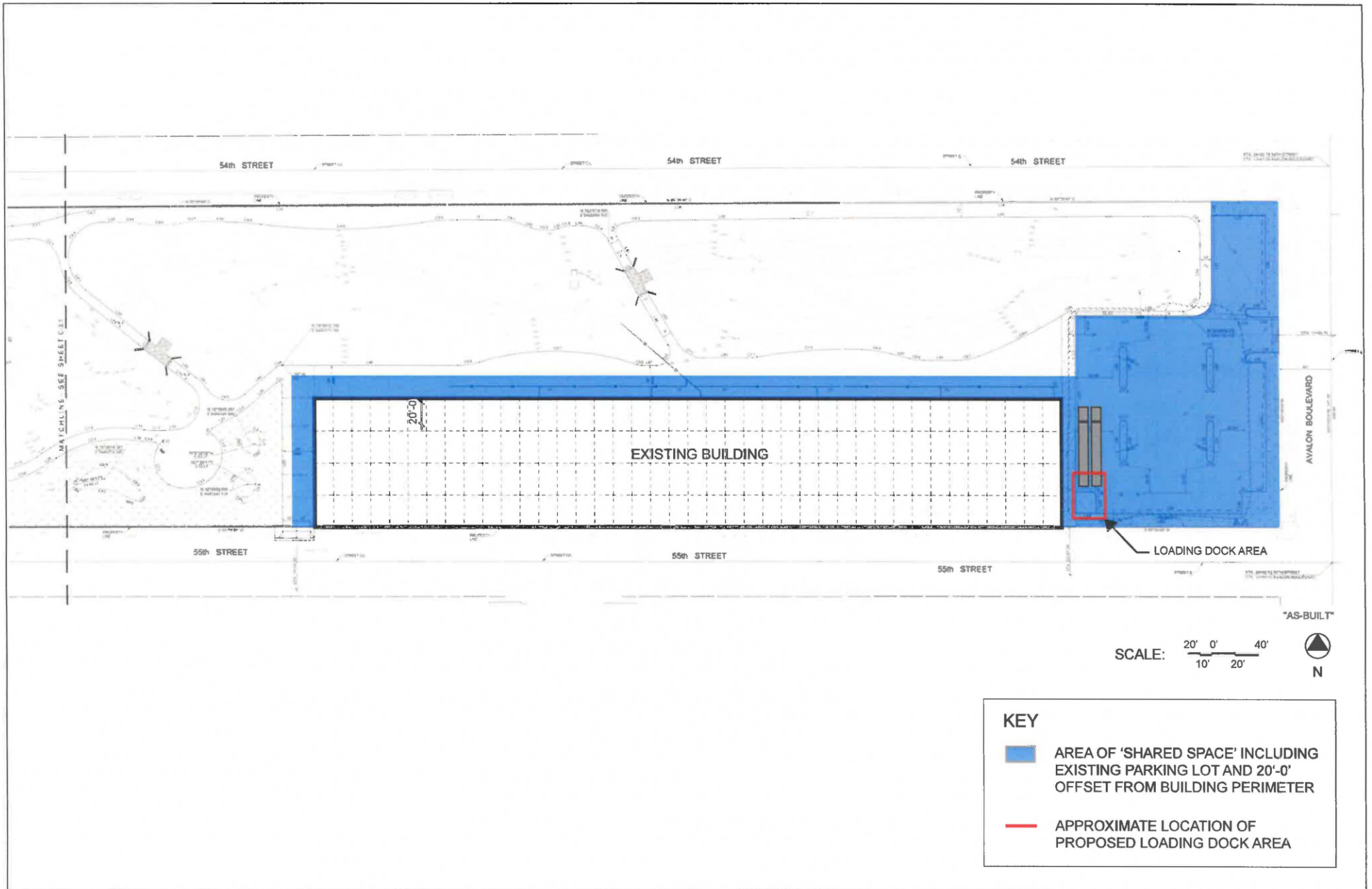
*LACMA will conduct twelve of these offerings in year one via a rotating schedule of monthly programs held at one of six Recreation and Parks Centers (i.e. two per center) surrounding the Wetlands site. Conducting these initial workshops off-site using reproductions of artworks from the collection is a strategic way for LACMA to form meaningful relationships with residents and demonstrate the museum's value during construction. In year two, the monthly offerings at the Six Recreation and Parks centers will continue up until the first 10,000 square feet of program space is open to the public in the Building in the Park, at which time LACMA will shift the location of this programming to the Wetlands site exclusively, where original artworks will be the springboard for the activities.

● Teaching Assistant Training Program

Each year LACMA will train a cohort of young adults, for free, to serve as teaching assistants for programs. Trainees will learn about the museum, art-making methods and materials, techniques for engaging program participants, and strategies for anticipating visitor needs. As part-time museum employees, they will receive compensation for their time. Through participating in the program, young adults gain valuable professional skills, contribute to their community, and serve as front line representatives of LACMA.

*In year one, LACMA will develop the curriculum of the program, recruit and train the first cohort of applicants at one of the six neighboring Recreation and Parks centers. The inaugural cohort will begin assisting programs at the Wetlands site starting in year two, once the first 10,000 square feet of program space is open to the public in the Building in the Park.





ATTACHMENT 5

SOUTH LOS ANGELES WETLANDS PARK LEASE AGREEMENT FOR THE RESTORATION, REHABILITATION AND REUSE OF BUILDING 71 PROJECT

SUPPLEMENTAL ENVIRONMENTAL REVIEW OF PREVIOUS CERTIFIED ENVIRONMENTAL IMPACT REPORT

PROJECT DESCRIPTION

Project Background

The proposed project is part of the original South Los Angeles Wetlands Park Project, which included two elements: 1) a stormwater pre-treatment system and constructed wetlands to improve local stormwater and dry-weather runoff quality; and, 2) a recreational space for educational and community-serving uses. The pre-treatment and wetland components of the Project assisted the City in meeting TMDL requirements for the Los Angeles River Watershed adopted by LARWQCB for reducing pollutants from stormwater runoff occurring within the 525-acre local watershed, so that the subject runoff (which eventually drains into the Los Angeles River) can be discharged with a reduced pollutant load. The wetlands component of the project was completed in 2012.

The recreational space for educational and community-serving uses of the new Wetlands Park included the reuse of the 81,760 square foot historic vehicle repair building (Building 71) located along the southern boundary of the site, which was to be reused and occupied in two phases. In Phase I, 10,000 square feet of the building would be used for community and educational uses, as described above, and 5,000 square feet used for general maintenance storage for the proposed Wetlands Park. In Phase II, the remaining area (66,760 square feet) of the building would be converted to a transportation museum (approximately 10,000 square feet of interior space), an event center/multi-purpose open area (10,000 square feet) and general office space (approximately 46,760 square feet).

The reuse of the building would involve minor rehabilitation of a historic structure, including exterior items such as painting and repair of windows, and interior upgrades in response to building code requirements (such as plumbing or electrical system improvements). This minor rehabilitation of the building would be conducted in a manner that preserves the historical and architectural value in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. However, to date the building has not been reused as planned due a lack of funding. The building was "moth-balled" in 2011 to preserve the historic building in an "arrested state of deterioration."

Project Location

The proposed Project is located in the vacant “Building 71” at the southeast part of the South LA Wetlands Park. The park is located in an urbanized neighborhood in the City of Los Angeles, approximately five miles south of downtown Los Angeles and approximately 0.5 miles east of Interstate 110, within the Southeast Los Angeles Community Planning Area. The location of the 9-acre Wetlands Park is at 5413 South Avalon Boulevard. The Wetlands Park site borders on 54th Street to the north, 55th Street to the south, and between Avalon Boulevard and San Pedro Street to the east and west, respectively.

Project Activities

Recently, the Museum Associates dba the Los Angeles County Museum of Art (LACMA) met with Department staff to discuss a proposal to manage and operate a museum program at the park. LACMA is proposing to provide programming for organized museum, cultural, recreational, and community activities. The proposal also includes an offer to repair, retrofit and provide improvements to Building 71 at no cost to RAP. The work will make Building 71 meet current code requirements for seismic, structural, mechanical, electrical, and plumbing systems, and includes any hazardous materials abatement as needed.

LACMA proposes to begin providing museum programming services at designated recreation centers near the South LA Wetlands Park within six (6) months of the execution of the lease agreement while the repair and retrofit work is being conducted in Building 71. Programming at the park will be provided within eighteen (18) months of the execution of the lease agreement.

LACMA has requested a term of not more than thirty-five (35) years. The premises area shall include the entire 84,000 square foot Building 71. There is a shared use area that includes portions of the park immediately adjacent to the building and the east side parking lot as depicted in Exhibit B.

LACMA proposes to initially improve up to 10,000 square feet of space in the building for use for public programming within eighteen (18) months of the execution of the lease agreement. An additional 13,000 square feet of space in the building (8,500 square feet for additional public programming and 4,500 square feet for a Ranger Station) will be improved within five (5) years after the completion of the initial 10,000 square foot improvement. LACMA may elect to improve another 12,000 square feet of space in the building within ten (10) years of the execution of the lease agreement.

LACMA shall use the premises area for the operation of art and culture-related and instructional public programs and ancillary or related uses, including the storage of LACMA’s art collection, operation of a restaurant or café, operation of a retail space, and providing recreational and instructional programs to the surrounding communities.

LACMA’s proposed public programming component is further described in Exhibit D of the Lease Agreement (Attachment 2). The public programming strategy’s goal is to realize

LACMA's vision of engaging the local community both through compelling public art programs and training initiatives that support residents in becoming paid staff. Programs include Social Justice-themed School Tour and Art-Making; Teen Tour Guide Programs; Intergenerational Weekday and Weekend Programs; and Teaching Assistant Training Programs.

Park Ranger Station

As indicated above, LACMA will improve 4,500 square feet of building space for the installation of a Park Ranger Station. Improvements shall be limited to providing utility (gas, electricity and water) hookups and in ensuring that the Department is able to connect its internal information and technology systems to the electrical and data cable connections of the building. City shall be responsible for any additional capital and other improvements it deems necessary or desires.

LA Philharmonic and YOLA

LACMA is currently in discussions with the Los Angeles Philharmonic (Philharmonic) concerning the possibility of bringing its Youth Orchestra Los Angeles program to the park. Should this occur, LACMA proposes to sublease a portion of the building to the Philharmonic.

Project Purpose

The purpose of the proposed project is to fulfill the recreation and educational amenities objective of the original Wetlands Park Project through the renovation, rehabilitation and reuse of Building 71 in the park.

Local Conditions in Project Vicinity

The proposed Wetlands Park site is located within a long-established urban community comprised of a variety of uses including residential, commercial, public facilities, and industrial. It is within a redevelopment area designed to address a number of identified problems within the region, such as urban decay and blight, depressed economy, overcrowding, and a high crime rate. The area is also characterized by the presence of incompatible land uses, such as industrial uses adjacent to residences, and a lack of amenities such as open space and cultural facilities.

A variety of uses surrounds the site, including residential, commercial, and public facilities. Specifically, to the south is an open lot for vehicle storage/parking and residential uses, primarily single-family homes. To the west, the uses include residential, commercial, and a church; to the east uses include commercial, and a church. To the north are an existing high school (The Maya Angelou Community High School) and a large building that houses a swap meet, and a small food market.

CEQA CLEARANCE FOR THE USE OF THE EXISTING EIR FOR THE SOUTH LOS ANGELES WETLANDS PARK

Staff has determined that the renovation, rehabilitation and reuse of Building 71 under the proposed lease agreement is substantially the same in concept as Phase II the of original South Los Angeles Wetlands Park project. Therefore, based on substantial evidence from a supplemental environmental review, it was determined that the previously certified Final Environmental Impact Report (FEIR-SCH No. 2007051122) and supporting technical studies (Environmental Documents) adequately assesses the environmental effects of the proposed renovation, rehabilitation and reuse of Building 71 project. On April 8, 2008, City Council certified the Final EIR for the park project and adopted Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program (MMRP). A Notice of Determination filed with the Los Angeles County Clerk occurred on April 11, 2008.

California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Subsequent or Supplemental EIR is required by the lead agency or by any responsible agency:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR;
2. Substantial changes occur with respect to the circumstances under which the project is being undertaken that will require major revisions in the environmental impact report; or,
3. Previously unknown new information at the time of the certification of the EIR as complete becomes available.

As demonstrated in the supplemental environmental review to follow, all the environmental impacts from the Phase II renovation, rehabilitation and reuse of Building 71 under the proposed lease agreement would be same or substantially similar to those assessed in the certified EIR. Staff has determined that:

- 1) The proposed project **will not** involve substantial changes in the project scope requiring major revisions in the previous EIR due new significant environmental effects, or an increase in the severity of previously identified significant effects;
- 2) The circumstances under which the project is undertaken **will not** require revisions of the previous EIR due new significant environmental effects or an increase in the severity of previously identified significant effects;
- 3) There is **no** new information of substantial importance showing new significant environmental effects not discussed in the previous EIR, or an increase in the severity of previously examined significant effects;
- 4) There are **no** mitigation measures or alternatives to the project considerably different from those analyzed in the previous EIR that would substantially reduce one or more significant effects on the environment, but not adopted with the previous EIR.

Based on this determination, the proposed Project does not meet the requirements for preparation of a Subsequent or Supplemental EIR pursuant to Section 15162 and 15163 of the State CEQA Guidelines for approval of the project.

Comparison of Project Descriptions

EIR Project Description	Current Proposed Project Description
Renovations/Rehabilitation	Renovations/Rehabilitation
Not specified, but in compliance with Secretary of Interior Standards	Improvements include the repair and retrofit of the building to meet current code requirements for seismic, structural, mechanical, electrical, and plumbing systems, and to otherwise, accommodate the museum needs, including the installation of a loading dock. (Assuming compliance with Secretary of Interior Standards
Reuse (81,760 sq. ft.)	Reuse (35,000 sq. ft.)
10,000 sq. ft. multi-use community center (learning center, meeting rooms, and kitchen 5,000 sq.ft. storage space for community center	10,000 sq.ft. public programming, including the storage of LACMA's art collection, operation of a restaurant or café, operation of a retail space
10,000 sq. ft. events center/multi-purpose open area	8,500 sq. ft. additional public programming
46,760 sq. ft. general office space	4,500 sq. ft. Ranger Station
10,000 sq. ft. Transportation Museum	12,000 sq. ft. other improvements for public programming

Based on the comparison of the project described and analyzed in the EIR to the current proposed renovation and reuse project description, potential environmental effects would be the same or similar, and possibly less than those identified and examined in the previous EIR.

ADDITIONAL FACTUAL SUPPORT FOR USE OF THE CERTIFIED EIR

The purpose of this supplemental environmental review (checklist) is to evaluate the categories in terms of any “changed condition” (i.e. changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental result. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigations in prior environmental documents. The environmental categories might be answered with a “no” in the checklist since the component project for the reuse of Building 71 at South LA Wetlands Park does not introduce changes that would result in a modification to the conclusion of the prior environmental documents.

EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

Where Impact Was Analyzed

This column provides a cross-reference to the pages of the prior environmental documents where information and analysis may be found relative to the environmental issue listed under each topic.

Do Proposed Changes Involve New Significant Impacts?

Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the current project will result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

Any new Circumstances Involving New Impacts?

Pursuant to Section 15162(a) (2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) that:

1. Have occurred subsequent to the prior environmental documents;
2. Would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents;
3. Substantially increase the severity of a previously identified impact.

Any new Information Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete, requiring an update to the analysis of the previous

environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

- (A) The project will have one or more effects that are significant not discussed in the prior environmental documents;
- (B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, then the question would be answered 'Yes' requiring the preparation of a subsequent or supplemental EIR.

However, if the additional analysis completed as part of this Environmental Review finds:

1. that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified
2. identified environmental impacts are not found to be more severe
3. additional mitigation is not necessary,

then the question would be answered 'No' and no additional environmental documentation (supplemental or subsequent EIR) is required. New studies completed as part of this environmental review are attached to as an Addendum, or are on file with the Department.

Mitigation Measures Addressing Impacts.

Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already been implemented. A "yes" response will be provided in either instance. If "NA" is indicated, this Environmental Review concludes that the impact does not occur with this project and therefore no mitigations are needed.

DISCUSSION AND MITIGATION SECTIONS

Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue and the status of any mitigation that may be required or that has already been implemented.

Mitigation Measures

Applicable mitigation measures from the prior environmental review that apply to the project are listed under each environmental category.

Conclusions

A discussion of the conclusion relating to the analysis contained in each section.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigation Measures Addressing Impacts.
1. Aesthetics. Would the Project:					
a. Have a substantial adverse effect on a scenic vista?	3.11-3.12	NO	NO	NO	
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	3.11-3.12	NO	NO	NO	
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	3.11-3.12	NO	NO	NO	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	3.11-3.12	NO	NO	NO	

1. Aesthetics. Would the Project:

Discussion:

The certified EIR analyzes whether the project would interfere with views of visual resources or it would blend with existing views. According to the study, the rehabilitation of Building 71, conducted according to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, would improve the visual character of the site and enhance the overall quality of the neighborhood. All lighting provided would comply with City of Los Angeles lighting requirements and would be directed so as to minimize glare and spillover impacts outside of the site boundaries. It is anticipated that the lighting would be less than the lighting used previously for the Metro facility.

Mitigation Measures:

There are no mitigation measures to reduce the impact of the project on aesthetic resources, because the certified EIR did not anticipate that the project, which would comply with state and local ordinances, would have significant impacts on aesthetic resources

Conclusion:

The certified EIR concluded that the project would not have significant impact on aesthetic resources. The rehabilitation of Building 71 to include a mix of public and private cultural and office based activities does not change the scope of work analyzed in the certified EIR, and does not involve substantially more severe impacts on aesthetic resources. In fact, the proposed rehabilitation does not involve any exterior modification of the building and therefore it does not need any further analysis or verification.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
2. Agriculture. Would the project:					
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	NA				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	NA				
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?	NA				
<p>Discussion:</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not impact agricultural resources, and therefore was eliminated from the analysis. The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR, therefore the same conclusions apply.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
3. Air Quality. Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	3.40	NO	NO	NO	
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	3.40-3.42	NO	NO	NO	
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	3.42-3.43	NO	NO	NO	AQ1
d. Expose sensitive receptors to substantial pollutant concentrations?	NA				
e. Create objectionable odors affecting a substantial number of people?	NA				

3. Air Quality

Discussion:

The certified EIR analyzes the impacts of construction and operations on local air quality.

The analysis of the impacts of construction activities focuses on the actions needed to construct the wetlands and finds that NOx emissions should be mitigated and that construction would have significant unavoidable and localized impacts due to PM₁₀ emissions during construction. PM₁₀ and NOx emissions would occur mostly during the demolition of the buildings located on the site of the proposed wetlands and would not be significant during the rehabilitation of Building 71.

Emissions during operation were estimated based on the different activities that would take place in the entire area. The certified EIR estimates that Building 71 would be used as follows: 20,000 sqft. as library; 46,760 sqft. as general office; 10,000 sqft. as civic center and 5,000 sqft. as warehouse.

The current proposed uses can be summarized as follows: 30,500 sqft. public programming; 4,500 sqft ranger, station and the remaining 46,000 sqft. uses compatible with general office uses. Although the mix of uses would be slightly different, we assume that the potential trip generation of public programming could not be larger than the potential trip generation of a library or a civic center and that the trip generation potential of a ranger station would not be larger than that of a warehouse.

Mitigation Measures:

The certified EIR mandates mitigation measures to reduce NOx emission during construction. Such emissions would be caused by off road equipment that would not be used during the rehabilitation of Building 71.

Conclusion:

The certified EIR concluded that construction activities would generate NOx emissions that would exceed the regional threshold of significance that would be mitigated by AQ1. It also found that construction activities would generate PM₁₀ emissions that would exceed the local threshold of significance. Project operations, on the other hand, would not generate significant air quality impacts.

Construction activities to rehabilitate Building 71 would entail a small portion of the equipment and of the dirt movement required by the entire project analyzed in the certified EIR and would not add significant impacts to the impacts already analyzed in the document. Furthermore, given the compatibility of the proposed uses of Building 71 with the potential uses of the building considered in the certified EIR, the air quality impact of the proposed uses of Building 71 during operation would not be different from the air quality impact of the uses considered in the certified EIR, and that therefore no additional analysis is needed.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
4. Biological Resources. Would the project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	3.50-3.57	NO	NO	NO	BIO1 and BIO2
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	3.50-3.57	NO	NO	NO	
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?	3.50-3.57	NO	NO	NO	
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	NA				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	3.50-3.57	NO	NO	NO	

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?	NA				
4. Biological Resources						
<p>Discussion:</p> <p>The certified EIR finds that the site of the proposed Wetlands Park is urbanized and neither species of concern nor supporting habitat is present on the site. The development of the site as a Wetlands Park could include the planting of tree species that are protected (i.e., oaks) and/or could attract special status wildlife species, namely the Southwestern willow flycatcher.</p> <p>Future operation and maintenance activities within the proposed Wetlands Park, however, could impact those sensitive species, should they become established at the site. Construction activities needed to rehabilitate Building 71 could also impact those sensitive species. However, most construction activities would end by March 2018 (the start of a new nesting season) and they would not disturb sensitive species that might have established in the wetlands.</p> <p>Mitigation Measures:</p> <p>The certified EIR mandates that to mitigate potential impacts to Southwestern willow flycatcher during the nesting season and avoid violations of federal and state migratory bird protections, the following mitigation measures would be implemented:</p> <p>BIO1: Prepare a Wetlands Park monitoring plan that would require seasonal monitoring for the presence of the Southwestern willow flycatcher and other migratory birds if vegetation control or wetlands replanting is/are required during the breeding and nesting season (starting in March) once the Wetlands Park becomes operational. [...]</p> <p>BIO2: Refrain from vegetation control during the nesting season if Southwestern willow flycatcher or other migratory birds that would be affected by either vegetation control activities or wetlands replanting. [...] Vegetation control activities would occur prior to the nesting season to allow for adequate mosquito habitat control while also avoiding nest damage or disturbance. Vegetation control may occur during the nesting season in constructed wetland areas where no nests of migratory birds are present, as determined by a biologist.</p> <p>Conclusion:</p> <p>The certified EIR finds that with mitigation measures BIO1 and BIO2 operation of the proposed project would not result in significant impacts to biological resources. The rehabilitation of Building 71 will not involve changes in the project scope that would require additional analysis. Although local circumstances have changed, because of the presence of the new wetlands, BIO1 and BIO2 would mitigate the potential impacts of construction activities of the proposed project on biological resources. As such, the proposed project's impacts would not need additional analysis or verification.</p>						

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
5. Cultural Resources. Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	3.63-3.88	NO	NO	NO	CUL4, CUL5, CUL6 and CUL7
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	3.63-3.88	NO	NO	NO	CUL2 and CUL3
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	3.63-3.88	NO	NO	NO	CUL1
d. Disturb any human remains, including those interred outside the formal cemeteries?	3.63-3.88	NO	NO	NO	CUL2

5. Cultural Resources.

Discussion:

The project analyzed in the certified EIR included the demolition of several buildings that would be contributors to a California Register – eligible historic district associated with the operation of the former Los Angeles Railway (LARy) and the rehabilitation of the former paint shop, called Building 71. The proposed project would rehabilitate Building 71 following the recommendations the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, and adaptive re-use it as a space for public programming.

Mitigation Measures:

To mitigate the impact on historic resources, the certified EIR mandated a comprehensive historic documentation of the entire site, consistent with the Historic American Building Survey/Historic American Engineering Record/Historic American Landscape Survey (HABS/HAER/HALS) format and conform to the applicable standards described in the Secretary of Interior Standards for Architectural and Engineering Documentation to be deposited at the MTA Dorothy Peyton Gray Transportation Library and to the Central Branch of Los Angeles Public Library (CUL5). Furthermore, prior to the commencement of any demolition activity, potentially historic items would be identified, salvaged and stored for future use (CUL6). Finally, a transportation museum plan and/or an interpretive program which presents the history of the South Park Shops complex would be developed for implementation during Phase II. The interpretive program would include an internet website that would be of educational benefit to the public and illustrate the history and historic architecture of the site through photographs, video, and oral history interviews collected from former Los Angeles Railway/Los Angeles Transit Lines employees, and others, familiar with historic functioning of the facility. Additionally, a permanent, on-site interpretive facility presenting the history of the property and possibly incorporating historic building documentation and salvaged elements of the historic property would be created during Phase II of the Wetlands Park (CUL7).

Conclusion:

The certified EIR concluded that the project, even with the implementation of mitigation measures, would include a substantial adverse change to historic resources. CUL5 and CUL6 had been implemented before the construction of the South LA Wetlands Park and the proposed project, which would rehabilitate Building 71 following the recommendation of the historic survey, include the implementation of CUL7. As such, the proposed project consists in the implementation of Phase II of the project analyzed in the certified EIR, it does not involve any substantially more severe impact; its circumstances do not involve any new significant impact and no new findings or verifications are needed.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
6. 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: <ul style="list-style-type: none"> 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. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 	NA				
b. Result in substantial soil erosion or the loss of topsoil?	NA				
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?	NA				
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?	NA				

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?	NA				
6. Geology and Soils					
<p>Discussion:</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not impact geology and soils, and therefore the item was eliminated from the analysis. The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR, therefore the same conclusions apply.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
7. Greenhouse Gas Emissions. Would the project:					
a. Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	3.43-3.44	NO	NO	NO	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	3.43-3.44	NO	NO	NO	
<p>Discussion: The certified EIR assumes that energy requirements of the project in its entirety would be going to be smaller than the energy requirements of the structures existing in the area before the project and concludes that there would be no net increase of GHG emissions.</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not increase GHG emissions and that no mitigation measures would be necessary. The rehabilitation of Building 71 to include private and public activities is consistent with the project analyzed in the certified EIR and does not involve new significant impacts. Local air quality conditions have not significantly changed, therefore no new or more severe impacts are expected and no new analysis or verification are needed.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
8. 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?	3.119-3.129	NO	NO	NO	
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?	3.119-3.129	NO	NO	NO	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	3.119-3.129	NO	NO	NO	HAZ1, HAZ2, HAZ 3, HAZ4, HAZ5 and HAZ6
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?	3.119-3.129	NO	NO	NO	
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?	NA				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	NA				

8. Hazards and Hazardous Materials. Would the project:					
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	NA				
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?	NA				

8. Hazards and Hazardous Materials

Discussion:

The analysis included in the certified EIR found clarifiers, underground tanks and soil contamination in the portion of the area that needed to be excavated to build the South LA Wetlands Park and found lead and asbestos containing materials in the existing buildings. Building 71 contains white and beige lead based peeling paint and brown vinyl tiles containing asbestos at different hazardous concentrations. Removal of hazardous and contaminated materials would potentially cause significant impacts on human health.

The certified EIR also addresses issues related to vector control and points out that if the wetlands were not maintained adequately, there could be areas of reduced water flow that would be conducive to mosquito larvae growth and in the harboring of adult mosquito population.

Mitigation Measures:

The certified EIR includes mitigation measures that would reduce the potential release of contaminated materials to the environment and protect workers during demolition, excavation and renovation. Mitigation measures related to the wetland excavation were implemented during construction, and a few mitigation measures are targeted specifically to the removal and renovation of existing buildings:

HAZ2: Prior building demolition, review past asbestos containing materials (ACM) and lead-based paint (LBP) surveys and, if necessary, perform new surveys to identify all ACM and LBP in all buildings on the Wetlands Park site. [...] All ACM and LBP would be removed or otherwise abated prior to demolition or, in case of the retained building, renovation. Removal and abatement activities would comply with all applicable laws, regulations and rules.

HAZ3: Prior to demolition of the buildings and renovation of the retained building, coordinate with the Greater Los Angeles Vector Control District (GLAVCD) and implement vector eradication.

Conclusion:

The certified EIR finds that following implementation of mitigation measures there would be no significant impacts from hazards of hazardous materials associated with the project. The potential impacts of Building 71 rehabilitation are addressed in the certified EIR, which includes mitigation measures targeted specifically to the rehabilitation process. The project scope of the proposed project has not substantially changed to require new analysis, local environmental circumstances have been adequately addressed by the certified EIR and no new information has emerged that requires new analysis or verification. As such, with the implementation of mitigation measures, the proposed project is not expected to result in significant exposure of people and workers to health hazards or public nuisance.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
9. Hydrology and Water Quality. Would the Project:					
a. Violate any water quality standards or waste discharge requirements?	3.139-3.145	NO	NO	NO	
b. Substantially deplete groundwater supplies or interfere substantially 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 uses for which permits have been granted?	3.139-3.145	NO	NO	NO	
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?	3.139-3.145	NO	NO	NO	
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?	3.139-3.145	NO	NO	NO	
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	3.139-3.145	NO	NO	NO	
f. Otherwise substantially degrade water quality?	3.139-3.145	NO	NO	NO	

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9. Hydrology and Water Quality. Would the Project:					
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	3.139-3.145	NO	NO	NO	
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	3.139-3.145	NO	NO	NO	
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?	3.139-3.145	NO	NO	NO	
j. Inundation by seiche, tsunami, or mudflow?	3.139-3.145	NO	NO	NO	
<p>Discussion: The certified EIR addresses issues of water quality and flood control associated with the construction of the South LA Wetlands Park such as stormwater management, erosion and alteration of drainage patterns during construction and operation and water quality during construction and operation. The document concludes that with compliance with the Construction General Permit and local City stormwater ordinances related to construction activities all hydrology and water quality impacts are expected to be less than significant. The rehabilitation of Building 71 does not include additional construction activities that could have any impact on hydrology and water quality and would be carried out in compliance with existing construction rules.</p> <p>Mitigation Measures: Construction General permit rules and local City stormwater ordinances related to construction activities will be implemented.</p> <p>Conclusion: The certified EIR concludes that the project would not be expected to have significant impacts on hydrology and water quality. The rehabilitation of Building 71 to include private and public activities is consistent with the project analyzed in the certified EIR and does not involve new significant impacts. Although the local environmental setting is quite different from the environmental setting analyzed in the EIR, because Building 71 is now adjacent to a wetland, the project is expected to comply with the existing rules and regulations on construction activities as indicated in the certified EIR and is not expected to affect the severity of the impacts identified in the EIR, nor to require new analysis or verifications.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
10. Land Use and Planning. Would the project:					
a. Physically divide an established community?	NA				
b. Conflict with any 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	3.161-3.165	NO	NO	NO	LU-2
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	3.161-3.165	NO	NO	NO	
<p>Discussion: The certified EIR analyzes the compatibility of the project with applicable land use plans and acknowledges that a General Plan amendment, a zone change, a conditional use permit and a variance would be needed. Furthermore, it finds that the proposed uses are compatible with the existing uses of the surrounding properties even more than the original light industrial land use. However, it finds a discrepancy between the number of parking stalls currently required for the uses proposed in Building 71 (Zoning Code Section 12.21A4) and the number of parking stalls currently available on the property, and identifies the need for a zone variance (LU-2).</p> <p>Mitigation Measures: The General Plan amendment, zone change, conditional use permit and a zone variance to reduce the parking requirements have been approved (CPC-2006-9769-GPA-ZC-CU-ZV-SN) by the Los Angeles City Council on April 22, 2008.</p> <p>Conclusion: The certified EIR concludes that, with mitigation measures, the project would not generate impacts on land use and planning. The rehabilitation of Building 71 impact on land use has been addressed by the certified EIR. As such, the project does not include any activity that would involve additional significant or more severe impacts as the project assessed by the certified EIR. At the same time, although local circumstances have changed, they do not involve any new significant or substantially more severe impact and no new information requiring new analysis or verification has surfaced.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
11. 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?	NA				
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?	NA				
<p>Discussion:</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not impact mineral resources, and therefore the item was eliminated from the analysis. The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR, therefore the same conclusions apply.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
12. Noise. Would the project result in:					
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	3.175-3.185	NO	NO	NO	
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	3.175-3.185	NO	NO	NO	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	3.175-3.185	NO	NO	NO	NOS1, NOS2 and NOS3
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	3.175-3.185	NO	NO	NO	
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?	3.175-3.185	NO	NO	NO	
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?	3.175-3.185	NO	NO	NO	

12. Noise.

Discussion:

The certified EIR discusses the noise environment of the area surrounding the proposed Wetlands Park site, and analyzes the effects of construction and operational noises related to the project. It finds that temporary construction noise during the demolition phase and during excavation and grading of the proposed wetlands would represent a significant impact to sensitive receptors. It also finds that noise related to the operation of the South LA wetlands park would be mostly caused by additional traffic, and would not involve significant impacts. In relation to the activities taking place in Building 71, the certified EIR claims that “Activities related to the educational center, community room, transportation museum, and general office uses would be confined to the existing and retained building, and are not expected to result in operational noises that would be noticeable outside of the proposed Wetlands Park, or result in noise level increases that approach or exceed 3 dBA. As a consequence, operation associated with the proposed Wetlands Park is not expected to result in significant noise impacts.” (City of Los Angeles, Bureau of Engineering, *Draft Environmental Impact Report for the South Los Angeles Wetlands Park Project*, SCH#2007051122, W.O. EW40006, Los Angeles 2007, p. 3-184)

Mitigation Measures:

The certified EIR includes mitigation measures that would lessen the noise impact on sensitive receptors during construction and such measures have been implemented.

Conclusion:

The certified EIR concludes that during construction of the wetlands short term significant increases in ambient noise level would occur. The rehabilitation of Building 71 requires mostly indoor construction and its future uses are compatible with the uses analyzed in the certified EIR. Therefore, the facility would not be expected to produce operational noises noticeable outside the park. As such, the proposed project would not include activities that involve new significant or more severe impacts. As local noise related conditions have not changed, no new or more severe impacts are expected and no new information requiring new analysis or verification has surfaced.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
13. 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)?	NA				
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	NA				
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	NA				
<p>Discussion:</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not impact population and housing, and therefore the item was eliminated from the analysis. The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR, therefore the same conclusions apply.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
14. Public Services.					
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any the public services:	NA				
Fire protection?	NA				
Police protection?	NA				
Schools?	NA				
Parks?	NA				
Other public facilities?	NA				
<p>Discussion:</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not impact public services, and therefore they were eliminated from the analysis. The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR, therefore the same conclusions apply.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
15. 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?	NA				
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?	NA				
<p>Discussion:</p> <p>Mitigation Measures:</p> <p>Conclusion: The EIR determined that the project would not impact recreation, and therefore the item was eliminated from the analysis. The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR, therefore the same conclusions apply.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
16. Transportation/Traffic. 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 ration on roads, or congestion at intersections)?	3.192-3.200	NO	NO	NO	
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	3.196-3.197	NO	NO	NO	
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?	NA				
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	NA				
e. Result in inadequate emergency access?	NA				
f. Result in inadequate parking capacity?	3.199-3.200	NO	NO	NO	TRA1, TRA2, TRA3, TRA4, TRA5, and TRA6
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	NA				

16. Transportation/Traffic.

Discussion:

The certified EIR analyzes traffic impacts of the South LA wetlands and of the rehabilitated Building 71, and finds that the construction phase would require a work plan, but the operation of the park and rehabilitated Building 71 would not result in significant impacts on the local transportation system.

The certified EIR bases its conclusion on traffic projections that start in 2008 and end in 2013 and considers that traffic would increase by a yearly 1%. Recent studies completed for the EIR of the South East Los Angeles Community plan find, however, that morning peak traffic in the area has increased by a yearly 0.5% a year (3.65% in the 8 years between 2008 and 2015) (City of Los Angeles, Department of City Planning, *South Los Angeles and Southeast Los Angeles Community Plans Draft EIR*, Los Angeles, CA 2016, p. 4.15-23)

The certified EIR also acknowledge that the parking requirements for the rehabilitated Building 71 would exceed the number of parking spaces available in the area and includes several mitigation measures that would address the issue.

Mitigation Measures:

The certified EIR includes the following mitigation measures that address the parking shortage related to the rehabilitated Building 71:

TRA-1: Maximize the number of parking spaces designed into the off-street parking lot for Phase I of the Wetlands Park. After Phase II of the Wetlands Park becomes operational, parking demand is expected to be approximately 170 spaces. Prior to the design of Phase II, parking demand and requirements would be re-evaluated based on the specifics of the project and the conditions at that time to determine the exact number of parking spaces needed (beyond the spaces provided in Phase I).

TRA-2: Enter into a shared parking agreement with LAUSD to utilize parking on the proposed Central Region High School No. 16 site across 54th Street, or other proximate land owners that have parking available nearby, to meet parking code requirements, if feasible.

TRA-3: Provide valet parking to allow higher vehicle densities (in the Wetlands Park parking lot) than would otherwise occur under normal parking lot conditions.

TRA-4: Reduce the office space component of Phase II from 46,760 by 20,000 square feet (SF), for a total office space use of 26,760 SF, and use the 20,000 square feet for Phase II parking (based on 350 SF per parking space). Adjustments to the square footage office space conversion to parking can be made provided the parking demand and/or code requirements balance. Any modifications to the structure would comply with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

TRA-5: Prior to implementation of Phase II, replace a portion of the passive recreational area of the Wetlands Park with an additional off-street surface parking lot to provide the required parking spaces. The estimate surface area of park reduction and parking lot area increase is approximately 0.85 acres (based on 350 square feet per parking space).

TRA-6: During operation of Phase II of the Wetlands Park, provide trip reduction incentives to encourage ride sharing, transit usage, and other trip and parking reductions.

Conclusion:

The certified EIR finds that, with mitigation measures, the project would not have significant impacts on the transportation system. The rehabilitation of Building 71, that includes uses similar to those assessed in the certified EIR, would re-evaluate parking requirements and implement the mitigation measures that would fit the reassessed parking requirements during the permitting phase of the project. As such, the proposed project does not involve changes that would cause new significant impacts or more severe impacts. Local conditions have changed, but no new or more severe impacts are expected and no new information requiring new analysis or verification are needed.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
17. Utilities and Service Systems. Would the Project:					
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	NA				
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?	NA				
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	NA				
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	3.209-3.213	NO	NO	NO	
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?	NA				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	3.220-3.226	NO	NO	NO	
g. Comply with federal, state, and local statutes and regulations related to solid waste?	3.220-3.226	NO	NO	NO	

17. Utilities and Service Systems.

Discussion:

The certified EIR analyzes the impacts of the project on potable water demand and on solid waste disposal and concludes that there will be no significant impacts and no mitigation measures would be required.

Mitigation Measures:

Conclusion:

The certified EIR finds that the project would not have significant impacts on potable water demand and on solid waste disposal and that no mitigation measures are required. The rehabilitation of Building 71 includes uses similar to those assessed in the certified EIR and does not involve changes that would cause new significant impacts or more severe impacts. As local water demand and solid waste disposal conditions have not changed, no new or more severe impacts are expected and no new information requiring new analysis or verification are needed.

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts.
18. Mandatory Findings of Significance.					
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a 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?	3.50-3.57 3.63-3.88	NO	NO	NO	BIO1 and BIO2 CUL 5-7
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a 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)?	5.1-5.14	NO	NO	NO	
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	3.50-3.57 3.119-3.129 3.161-3.165 3.175-3.185 3.192-3.200 3.220-3.226	NO	NO	NO	HAZ1, HAZ2, HAZ 3, HAZ4, HAZ5 and HAZ6 LU2 NOS1, NOS2 and NOS3 TRA1, TRA2, TRA3, TRA4, TRA5, and TRA6
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	3.11-3.12	NO	NO	NO	

18. Mandatory Findings of Significance.

Discussion:

The certified EIR finds that the project would not have significant impacts on aesthetics, hydrology and water quality and on utilities (potable water demand and solid waste), and finds that it would not generate additional light or glare. It also finds that, with mitigation measures, the project would not have significant impacts on biological resources and on archaeological and paleontological resources. Furthermore, it finds that, mitigation measures would be key to reduce the project's impacts on hazards and hazardous materials, land use and transportation to a less than significant level. Finally, it finds that the project would have significant and unavoidable impacts on air quality, on cultural resources and on noise and that these impacts would cumulate to similar impacts of other projects in the area.

Mitigation Measures:

Many of the mitigation measures included in the certified EIR have been implemented in the construction phase of South LA Wetlands Park. Nevertheless, the document contains some measures targeted to the rehabilitation of Building 71, and specifically:

CUL7: that includes the development of a transportation museum plan and/or an interpretive program which presents the history of the South Park Shops complex;

HAZ2: Prior building demolition, review past asbestos containing materials (ACM) and lead-based paint (LBP) surveys and, if necessary, perform new surveys to identify all ACM and LBP in all buildings on the Wetlands Park site. [...] All ACM and LBP would be removed or otherwise abated prior to demolition or, in case of the retained building, renovation. Removal and abatement activities would comply with all applicable laws, regulations and rules.

HAZ3: Prior to demolition of the buildings and renovation of the retained building, coordinate with the Greater Los Angeles Vector Control District (GLAVCD) and implement vector eradication.

TRA-1: Maximize the number of parking spaces designed into the off-street parking lot for Phase I of the Wetlands Park. After Phase II of the Wetlands Park becomes operational, parking demand is expected to be approximately 170 spaces. Prior to the design of Phase II, parking demand and requirements would be re-evaluated based on the specifics of the project and the conditions at that time to determine the exact number of parking spaces needed (beyond the spaces provided in Phase I).

TRA-2: Enter into a shared parking agreement with LAUSD to utilize parking on the proposed Central Region High School No. 16 site across 54th Street, or other proximate land owners that have parking available nearby, to meet parking code requirements, if feasible.

TRA-3: Provide valet parking to allow higher vehicle densities (in the Wetlands Park parking lot) than would otherwise occur under normal parking lot conditions.

TRA-4: Reduce the office space component of Phase II from 46,760 by 20,000 square feet (SF), for a total office space use of 26,760 SF, and use the 20,000 square feet for Phase II parking (based on 350 SF per parking space). Adjustments to the square footage office space conversion to parking can be made provided the parking demand and/or code requirements balance. Any modifications to the structure would comply with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

TRA-5: Prior to implementation of Phase II, replace a portion of the passive recreational area of the Wetlands Park with an additional off-street surface parking lot to provide the required parking spaces. The estimate surface area of park reduction and parking lot area increase is approximately 0.85 acres (based on 350 square feet per parking space).

TRA-6: During operation of Phase II of the Wetlands Park, provide trip reduction incentives to encourage ride sharing, transit usage, and other trip and parking reductions.

Conclusion:

The rehabilitation of Building 71 includes uses that are not dissimilar from the uses assessed in the certified EIR. As such, it does not involve changes that would cause new significant impacts or more severe impacts. Local conditions have slightly changed, for the presence of the new South LA Wetlands Park in the immediate vicinity of the building, but no new or more severe impacts are expected and no new information requiring new analysis or verification are needed.

