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September 5, 2013

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
LOS ANGELES STREET CIVIC BUILDING PROJECT**

Pursuant to the State of California Public Resources Code and Article 7 of the California Environmental Quality Act (CEQA), as amended, the City of Los Angeles Bureau of Engineering has evaluated the potential environmental impacts of the project described below. On the basis of this Draft Environmental Impact Report (DEIR), we have found that the proposed project could have significant effects on the environment related to aesthetics, air quality, cultural resources, land use and planning, transportation and traffic. Other areas covered in the DEIR for which the project would not result in significant impacts are greenhouse gas emissions, geology and soils, hazards and hazardous materials, noise and vibration, utilities and service systems, and energy.

**PROJECT DESCRIPTION:** The Los Angeles Street Civic Building Project would reactivate the existing Parker Center property to provide office space for City of Los Angeles employees. Following the completion of the new Police Administration Building, a majority of the existing Parker Center building was permanently vacated and secured. Currently, only a small portion of the facility is used by the Police Department and the facility is expected to be fully vacated by the end of 2012. Due to the property's close proximity to City Hall, the City has identified an opportunity to improve services by reactivating this under-utilized property.

In addition to the No Project Alternative, there are three potential build alternatives that are under consideration for the site, all of which have been analyzed in the DEIR:

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

**Partial Demolition, Rehabilitation, and Addition:** This would include rehabilitation of a majority of the Parker Center building, similar to that of previous alternative as well as demolition of the Parker Center jail which would be replaced with an expansion building. Combined with the existing Parker Center building, the expansion would expand the gross square footage to approximately 522,255 square feet, of which approximately 16,500 square feet



would be for commercial space and a child care facility. A connection between the expansion and the Parker Center building would be constructed. Approximately 328 parking spaces would be provided with this alternative. The expansion building would have a maximum height of approximately 200 feet. This also includes an optional inter-building tunnel that would connect City Hall East to the rehabilitated Civic Building.

**Demolition and Build:** This would result in the full demolition of the existing Parker Center building and construction of a new office building which would consist of approximately 753,730 gross square feet, and approximately 1,173 parking spaces with a maximum height of approximately 450 feet. The proposed 753,730-square-foot program could be accommodated in one or two buildings on the site. The new building(s) could take on a variety of configurations, but would generally fill the footprint of the existing Parker Center building. Outdoor open space and a pedestrian connection between City Hall to the west, and the Little Tokyo neighborhood to the east and south would be provided. This alternative also includes an optional inter-building tunnel or bridge that would connect City Hall East to the rehabilitated Civic Building.

**PROJECT LOCATION:** The existing Parker Center building is located at 150 North Los Angeles Street, midblock on the block bounded by North Los Angeles Street to the west, East Temple Street to the north, Judge John Aiso Street to the east, and East 1st Street to the south, in Downtown Los Angeles. Major roadways near the project site include U.S. 101 approximately 0.2 mile to the north, Interstate 110 (I-110) approximately 0.9 mile to the west, and Interstate 5 (I-5) approximately 1 mile to the east. Los Angeles City Hall is located approximately 500 feet to the northwest and Los Angeles Union Station is located approximately 0.3 mile to the northeast. Vehicle access to the project site is currently provided along Los Angeles Street and Judge John Aiso Street, with entrances to existing on-site parking lots on the west and east sides of the project site. The Parker Center building is accessible to pedestrians from its west facing entrance on Los Angeles Street, though there is access to the property from the east as well. The project site is located within the Little Tokyo neighborhood and is part of the Central City Community Plan.

**PUBLIC REVIEW PERIOD:** The proposed Los Angeles Street Civic Building Project DEIR will be circulated for public review beginning on September 5, 2013 and ending on October 21, 2013. A copy of the document is available for review at the Little Tokyo Branch Library, 203 S. Los Angeles Street, Los Angeles, 90012. A copy of this document may also be obtained by calling Paul Young of the Bureau of Engineering at (213) 485-4776, or by visiting the office address listed below, or by viewing the Bureau of Engineering Website, <http://eng.lacity.org/techdocs/emg/projects.htm>.

In accordance with the State CEQA Guidelines comments on the DEIR will be restricted to written communication. **All comments must be received in writing no later than 5:00 PM on October 21, 2013, by mailing to:**

Jim Doty, Environmental Affairs Officer  
City of Los Angeles  
Bureau of Engineering  
1149 S Broadway, Suite 600  
Los Angeles, CA 90015

Or via email to: [jim.doty@lacity.org](mailto:jim.doty@lacity.org)

Thank you for your interest.



# LOS ANGELES STREET CIVIC BUILDING PROJECT

## DRAFT ENVIRONMENTAL IMPACT REPORT - EXECUTIVE SUMMARY

### PREPARED FOR:



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**August 2013**



ICF International. August 2013. Los Angeles Street Civic Building Project.  
Draft Environmental Impact Report. (ICF Project #00024.10.) Los Angeles,  
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Engineering, Los Angeles, CA.

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## Acronyms and Abbreviations

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$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
AADT	annual average daily traffic
AAQS	ambient air quality standards
AB	Assembly Bill
AB	Assembly Bill
ACM	asbestos-containing materials
ACWM	asbestos-containing waste materials
ADA	Americans with Disabilities Act
AQMPs	air quality management plans
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
BAU	Business as Usual
BMPs	Best Management Practices
B.P.	Before Present
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL/EPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CCTV	closed-circuit television
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
$\text{CF}_4$	perfluoromethane
CFCs	Chlorofluorocarbons
$\text{CH}_4$	methane
CHRIS	California Historical Resources Information Center
CIDH	Cast-In-Drilled-Hole
CIP	commuter information packet
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database

CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CSU	California State University
dB	Decibel
dBA	A-Weighted Sound Level
DPM	Diesel Particulate Matter
DPW	Department of Public Works
DTSC	Department of Toxic Substances Control
EAD	Environmental Affairs Department
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
EPD	Environmental Programs Division
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
HABS	Historic American Buildings Survey
HALS	Historic American Landscape
HCFCs	Hydrochlorofluorocarbons
HCM	Historic-Cultural Monuments
HFCs	Hydrofluorocarbons
HOV	high-occupancy vehicles
HPOZ	Historic Preservation Overlay Zone
HSA	Hyperion Service Area
HSC	Health and Safety Code
HSR	Historic Structures Report
HSWA	Hazardous and Solid Waste Act
HTP	Hyperion Treatment Plant
HTP	Hyperion Treatment Plant
HWCL	Hazardous Waste Control Law
Hz	Hertz
I-110	Interstate 110
I-5	Interstate 5
IRP	Integrated Resources Plan
ISWM	Integrated Solid Waste Management
ITE	Institute of Transportation Engineers

kHZ	kilohertz
LABOE	Los Angeles Department of Public Works, Bureau of Engineering
LADBS	Los Angeles Department of Building and Safety
LADOT	of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAF	Sound level with 'A' Frequency weighting and Fast Time weighting
LAFD	Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code :
LAGWRP	Los Angeles Glendale Water Reclamation Plant
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAUSD	Los Angeles Unified School District
Ldn	Day/Night Noise Level
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent Noise Level
LOS	Level of Service
LRT	light rail transit
LTHD	Little Tokyo Historic District
LUST	Leaking Underground Storage Tanks
MA	millions of years ago
MATES III	Multiple Air Toxics Exposure Study III
Metro	Los Angeles County Metropolitan Transportation Authority
mg/m <sup>3</sup>	milligrams per cubic meter
mgd	million gallons per day
MLD	Most Likely Descendent
mmHG	millimeter of mercury
MMT	million metric tons
MOCA	Museum of Contemporary Art
mpg	miles per gallon
MPO	metropolitan planning organization
MTD	Motor Transport Division
MWD	Metropolitan Water District of Southern California
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO <sub>2</sub>	nitrogen dioxide

NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRHP	National Register of Historic Places
O <sub>3</sub>	Ozone
OPR	Office of Planning and Research
OVA	organic vapor analyzer
Pb	lead
PFCs	Perfluorocarbons
ppm	parts per million
ppmV	ppm by volume
PPV	peak particle velocity
proposed project	Los Angeles Street Civic Building Project
RCNM	Roadway Construction Noise Model
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation and Recovery Act of 1976
RMPP	Risk Management and Prevention Program
RMS	root-mean square
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SARA	Superfund Amendments and Reauthorization Act
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCG	Southern California Gas Company
SCP	Site Cleanup Program
SF <sub>6</sub>	Sulfur Hexafluoride
SHBC	State Historic Building Code
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation, and Cleanup
SMBRP	Site Mitigation and Brownfields Reuse Program
SO <sub>2</sub>	sulfur dioxide
SRA	Source Receptor Area
SRO	single-room-occupancy
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan

SWIRP	Solid Waste Integrated Resource Plan
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminants
TC	transportation coordinator
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TIC	Transportation Information Center
TISA	Terminal Island Service Area
TITP	Terminal Island Water Reclamation Plant
TMA	transportation management association
TMP	Transportation Management Plans for
TNM	Traffic Noise Model
TPH	total petroleum hydrocarbons
TRPH	total recoverable petroleum hydrocarbons
TSPP	Traffic Study Policies and Procedures
TWRP	Donald Tillman Water Reclamation Plant
UBC	Federal Uniform Building Code
UST	underground storage tank
V/C	vehicle to capacity
V/C	volume-to-capacity
VdB	velocity decibel
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WSA	Water Supply Assessment

## 1.1 Introduction and Background

The Parker Center building was the headquarters of the Los Angeles Police Department (LAPD) from 1954 to 2009, over which time the building has become outdated and no longer meets city and state building codes with respect to seismic safety as well as other requirements. Accordingly, a new Police Administration Building, which opened in 2009, is now the new LAPD headquarters. As of today, LAPD operations and staff have almost completely relocated to the new Police Administration Building, located just south of City Hall.

In 2010, the Los Angeles Department of Building and Safety and Los Angeles Fire Department inspected the building and determined that large portions of the building could not be safely occupied, including the fifth through eighth floors. At that time, a 24-hour fire watch was placed into effect and several fire-life safety corrective measures were identified (Los Angeles Department of Building and Safety and Los Angeles Fire Department 2010). The Department of Building and Safety also determined that the some LAPD personnel, namely the Scientific Investigation Division, could continue to occupy the fourth floor for approximately two years (i.e., 2012).

The Parker Center building is now nearly vacant; however, the City of Los Angeles envisions the Parker Center property as an opportune location to reuse the site for City service offices as well as a variety of needed services. Upon completion of the proposed project, the Los Angeles Street Civic Building would house several City departments, potentially including the General Services Department, Personnel Department, Department of Public Works, and others.

The environmental impact report (EIR) process, as defined by the California Environmental Quality Act of 1970 (CEQA) (Public Resources Code 21000 et seq.) as amended, requires the preparation of an objective, full-disclosure document to: a) inform agency decision makers and the general public of the direct and indirect environmental effects of a propose action; b) identify, where feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts; and c) identify and evaluate alternatives to the proposed project which might lessen or avoid some or all of the identified significant impacts of the project.

This EIR has been prepared to address the potential environmental impacts associated with the Los Angeles Street Civic Building project. In conformance with CEQA, this EIR identifies and assesses the potential individual and cumulative impacts of the proposed project.

## 1.2 Proposed Project Summary

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

### **1.2.1 Alternative A – No Project**

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

### **1.2.2 Alternative B1 – Rehabilitation**

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

### **1.2.3 Alternative B2 – Partial Demolition, Rehabilitation, and Addition**

Alternative B2 would include rehabilitation of a majority of the Parker Center building, similar to that of Alternative B1 as well as demolition of the Parker Center jail which would be replaced with an expansion building. Combined with the existing Parker Center building, the expansion would expand the gross square footage to approximately 522,255 square feet, of which approximately 338,000 square feet would be usable for office space and approximately 16,500 square feet would be for commercial space and a child care facility. A connection between the expansion and the Parker Center building would be constructed. Approximately 328 parking spaces would be provided with this alternative. The expansion building would have a maximum height of approximately 200 feet. Alternative B2 also includes an optional inter-building tunnel that would connect City Hall East to the rehabilitated Civic Building.

### **1.2.4 Alternative B3 – Demolition and Build**

Alternative B3 would result in the full demolition of the existing Parker Center building and construction of a new office building which would consist of approximately 753,730 gross square feet, and approximately 1,173 parking spaces with a maximum height of approximately 450 feet. The proposed 753,730-square-foot program could be accommodated in one or two buildings on the site. The new building(s) could take on a variety of configurations, but would generally fill the footprint of the existing Parker Center building. Outdoor open space and a pedestrian connection between City Hall to the west, and the Little Tokyo neighborhood to the east and south would be provided. Alternative B3 also includes an optional inter-building tunnel or bridge that would connect City Hall East to the rehabilitated Civic Building.

## 1.3 Issues to Be Resolved

Issues to be resolved include identification by the Los Angeles Department of Public Works, Bureau of Engineering (LABOE), of a preferred alternative, which will be done in the Final EIR after public comments on the Draft EIR have been received.

## 1.4 Areas of Controversy

Concerns raised in letters submitted to LABOE in response to the Notice of Preparation (NOP) include the following:

**Alternatives** – Concerns were raised regarding the ability of the project alternatives to meet the Secretary of Interior’s Standards for the Treatment of Historic Properties. Specifically, the comment concerns Alternative B3 resulting in the demolition of the Parker Center building, and requested that the EIR evaluate the feasibility of “sensitively-designed” infill construction such as a slender structure at the northeast corner of the block, or building atop the parking garage at the corner of First Street and Judge John Aiso Street.

**Cultural Resources** – The Native American Heritage Commission (NAHC) conducted a Sacred Lands File search and found that cultural resources were found in the vicinity of the proposed project. NAHC has requested that LABOE consult with them on the proposed project. Details regarding this consultation effort are discussed in Chapter 4.3 Cultural Resources.

**Community Relationship** – During the public scoping meeting for the proposed project, comments related to the proposed project’s relationship with the surrounding community were raised. Namely, the Little Tokyo Community raised the issues of connectivity between the Civic Center neighborhood and the Little Tokyo Community and allowing for commercial and public uses on the project site. These community concerns have been considered as part of the conceptual design of the proposed project.

## 1.5 Summary of Environmental Impacts of the Project Alternatives

Potentially significant environmental impacts have been identified in the areas of Aesthetics/Light and Glare, Air Quality, Cultural Resources, Land Use and Traffic. Table 1-1 provides a summary of each of the alternatives impacts and their associated significance. Significant environmental impacts of the three build alternatives are detailed in Tables 1-2 through 1-4 by resource area, along with proposed mitigation measures and level of significance after mitigation.

**Table 1-1. Comparison of Alternatives**

Alternative Impacts <sup>a</sup>	Alternatives			
	A - No Project	B1 - Rehabilitation	B2 - Partial Demolition, Rehabilitation, and Addition	B3 - Demolition and Build
<b>Aesthetics</b>				
Scenic Resources	NI	LTS	LTS	SU
Visual Character and Quality	NI	LTS	LTS	LTS
Glare, Nighttime Lighting, and Shade/Shadow	NI	LTS	LTS	SU
<b>Air Quality and Greenhouse Gas Emissions</b>				
Construction Emissions	NI	LTS (M)	SU	SU
Inter-Building Circulation Option	NI	SU	SU	SU
Operations-period Emissions	NI	LTS	SU	SU
Greenhouse Gas Emissions	NI	LTS (M)	LTS (M)	LTS (M)
<b>Cultural Resources</b>				
Historical Resources	NI	SU	SU	SU
Archaeological Resources	NI	LTS (M)	LTS (M)	LTS (M)
Paleontological Resources	NI	LTS (M)	LTS (M)	LTS (M)
<b>Geology and Soils</b>				
Seismic Hazards	NI	LTS (M)	LTS (M)	LTS (M)
Soil Stability	NI	LTS	LTS	LTS
<b>Hazards and Hazardous Materials</b>				
Contaminated soil	NI	LTS (M)	LTS (M)	LTS (M)
Groundwater contamination	NI	LTS (M)	LTS (M)	LTS (M)
Asbestos and lead-based paint	NI	LTS (M)	LTS (M)	LTS (M)
<b>Land Use and Planning</b>				
Physical division of community	NI	LTS	LTS	LTS
Conflicts with land use plans	NI	LTS	LTS	SU
<b>Noise and Vibration</b>				
Construction Noise	NI	LTS	LTS	LTS
Construction Vibration	NI	LTS	LTS	LTS
Operational Traffic Noise	NI	LTS	LTS	LTS
HVAC Noise	NI	LTS	LTS	LTS
Airport Noise	NI	LTS	LTS	LTS
<b>Transportation and Traffic</b>				
Construction traffic	NI	LTS	LTS	LTS
Operational traffic	NI	LTS (M)	SU	SU

Alternative Impacts <sup>a</sup>	Alternatives			
	A - No Project	B1 - Rehabilitation	B2 - Partial Demolition, Rehabilitation, and Addition	B3 - Demolition and Build
<b>Utilities, Service Systems, and Energy</b>				
Wastewater Treatment Requirements and Capacities	NI	LTS	LTS	LTS
Water Facilities and Supplies	NI	LTS	LTS	LTS
Storm Water Drainage Facilities	NI	LTS	LTS	LTS
Solid Waste Disposal Capacity and Regulations	NI	LTS	LTS	LTS
Energy Conservation	NI	LTS	LTS	LTS
<p><sup>a</sup> The Inter-Building Circulation Option is included under each of the build alternatives. If the impact is the same under the alternative with or without the option, then it is not listed in this table. If the impact is different, then the option is listed in this table.</p> <p>Note:</p> <p>NI: No Impact LTS: Less Than Significant Impact LTS (M): Less Than Significant Impact with Mitigation SU: Significant and Unavoidable Impact</p> <p>  Impacts of the build alternative are greater than to the other build alternatives.   Impacts of the build alternative are more severe than one or more build alternatives, but less severe than one or more build alternatives.   Impacts of the build alternative are similar to the other build alternatives.   Impacts of the build alternative are less than the other build alternatives.                 </p> <p>Source: ICF International, 2012.</p>				

As shown in Table 1-1, Alternative B1 would result in a significant and unavoidable impact on Cultural Resources and Air Quality (with the Inter-Building Circulation Option). Alternative B2 would result in three significant and unavoidable impacts in the areas of Air Quality, Cultural Resources, and Traffic. Alternative B3 would result in six significant and unavoidable impacts in the areas of Aesthetics, Air Quality, Cultural Resources, Land Use, and Traffic. A more detailed description of each impact associated with each of the alternatives and the proposed mitigation measures intended to reduce these impacts is provided in Tables 1-2 through 1-4.

**Table 1-2. Summary of Environmental Impacts of Alternative B1, Rehabilitation**

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Aesthetics</b>			
Construction activities, such as the installation of scaffolding and temporary sheathing, would temporarily diminish visual quality of the Parker Center building, a visual/scenic resource.	Less than significant	None	Less than significant
There would be changes to the visual setting such as provision of new landscape design elements.	Less than significant	None	Less than significant
Construction and operation would introduce new sources of light and glare. Light would be directed on-site and architectural materials would not have reflective surfaces. There would be no new sources of shade or shadow.	Less than significant	None	Less than significant
<b>Air Quality and Greenhouse Gas Emissions</b>			
Construction would result in reactive organic compounds (ROC) pollutant emissions that would exceed South Coast Air Quality Management District (SCAQMD) thresholds. <u>Inter-Building Circulation Option:</u> Construction would result in ROC, nitrogen oxides (NO <sub>x</sub> ) and fine particulate matter (PM <sub>2.5</sub> ) emissions that would exceed SCAQMD thresholds.	Significant	<b>AQ-1:</b> During construction, non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings shall be used where feasible, or pre-fabricated architectural panels shall be used in the construction of the project to reduce VOC emissions to the maximum extent practicable. VOC-containing materials shall be Super-Compliant Low VOC paint that meets "super-compliant" VOC standard of < 10 g/L of the South Coast Air Quality Management District (Rule 1113). These requirements shall be specified in the final architectural plans to be approved by the City of Los Angeles Department of Building and Safety prior to issuance of building permits.	Less than significant  <u>Inter-Building Circulation Option:</u> Significant and Unavoidable

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>Inter-Building Circulation Option would require the following:</u></p> <p><b>AQ-2:</b> Construction-period Haul Trucks – Model year 2010 and newer diesel haul trucks shall be used for material delivery trucks and soil import/export; if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> and PM emissions requirements.</p> <p><b>AQ-3:</b> Construction Off-road Equipment – Phase in the use of off-road construction equipment per the following schedule:</p> <ul style="list-style-type: none"> <li>• Project Start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> <li>• Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> </ul> <p><b>AQ-4:</b> SCAQMD “SOON” funds – Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides funds to</p>	

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>accelerate cleanup of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website: <a href="http://www.aqmd.gov/tao/Implementation/SOONProgram.htm">http://www.aqmd.gov/tao/Implementation/SOONProgram.htm</a></p> <p><b>AQ-5:</b> Use of existing electricity infrastructure – The City shall require by contract specifications that construction operations shall rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines to the extent feasible. Contract specification language shall be reviewed prior to issuance of a grading permit.</p>	
<p>Operation of the alternative would result in operational pollutant emissions due to increases in traffic.</p>	<p>Less than significant</p>	<p>None</p>	<p>Less than significant</p>
<p>The alternative would result in increased greenhouse gas emissions, which would have a cumulatively considerable contribution to the effects of climate change.</p>	<p>Significant</p>	<p><b>GHG-1:</b> Prior to the issuance of building permits, the project applicant shall prepare a recycling/solid waste reduction plan, subject to review and approval by the City of Los Angeles Department of Building and Safety. The City shall ensure that the proposed project maintains a recycling/solid waste reduction program that achieves a minimum reduction of 20 percent by volume of solid waste for Alternative B1, and 25 percent by volume for Alternatives B2 and B3.</p> <p><b>GHG-2:</b> Prior to the issuance of building permits, the City of Los Angeles Building Safety Department shall ensure that the proposed project incorporates energy conservation measures into the design of the proposed project that exceed mandatory requirements lighting efficiency requirements by 10 percent.</p> <p><b>GHG-3:</b> Prior to the issuance of building permits, the City of Los Angeles Building Safety Department shall ensure that the proposed project incorporates water conservation measures that shall include, but shall not be limited to, the following: reduce potable water demands by installing water-conserving, low-flow faucets, toilets, and urinals, etc.</p>	<p>Less than significant</p>

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Cultural Resources</b>			
<p>This alternative would result in the removal of some historic fabric of the Parker Center building in unique and/or specialized areas of the building including the crime lab on the 4<sup>th</sup> floor and the 6<sup>th</sup> floor chief's suite. Although its architectural significance would continue to be conveyed, other aspects of its significance would no longer be conveyed due to the removal of historic fabric.</p>	Significant	<p><b>HR-1:</b> To ensure the retention and appropriate treatment of essential character-defining features and to guide ongoing building maintenance, the City shall prepare a Historic Structures Report (HSR) regarding Parker Center. The HSR shall be prepared before the creation of construction drawings for the rehabilitation of the building so that the information in the HSR can be incorporated in the design.</p> <p><b>HR-2:</b> Because those aspects of the resource's significance relating to its role in the development of innovative scientific techniques for the investigation of crimes, its association with Chief Parker, and landscape design would no longer be conveyed under this alternative, the City shall document those areas of the building according to Historic American Buildings Survey (HABS) and Historic American Landscape (HALS) guidelines before those spaces and features are demolished.</p> <p><b>HR-3:</b> The HABS/HALS documentation shall be deposited with the Library of Congress, Los Angeles Public Library, Los Angeles Conservancy, and Los Angeles Police History Museum within a month of its completion.</p>	<p>Significant and Unavoidable</p> <p>Parker Center would retain the character-defining features that are essential to conveying its significance for architecture and would retain its eligibility for the National Register of Historic Places and the California Register of Historical Resources, but the removal of some of its historic fabric remains a significant and unavoidable impact.</p>
<p>The original design of the site included not only the building, but extended to the design of a parking structure and parking lot, landscape, and hardscape features of the entire block. Moreover, in 1958 the Motor Transport Division, consisting of two buildings, was constructed at the southeast corner of the site.</p> <p>Any one of these activities might not result in a significant impact. However, the physical destruction of these features over the course of</p>	Significant	None	Significant and Unavoidable

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
<p>three past projects, Metropolitan Communications Dispatch Center, Los Angeles Police Department Metropolitan Detention Center, and Toriumi Plaza, coupled with the proposed changes associated with the build alternatives eliminate the integrity of setting and feeling, resulting resulted in a cumulatively considerable impact under CEQA.</p>			
<p>Excavation has the potential to encounter significant unknown archaeological resources.</p>	<p>Significant</p>	<p><b>ARC-1:</b> A qualified professional archaeologist shall monitor all initial phase of ground disturbing activities of the project. If buried cultural resources — such as flaked or ground stone, historic debris, building foundations, or non-human bone — are discovered during ground-disturbing activities, work shall stop in that area and within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. Treatment measures typically include: development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation. A report of findings shall be prepared, and recovered materials curated, if needed, in an approved facility. If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed by previous construction or are unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated.</p>	<p>Less than significant</p>
<p>Excavation has the potential to disturb unknown significant paleontological resources.</p>	<p>Significant</p>	<p><b>PR-1:</b> A qualified vertebrate paleontologist shall be retained by the City or project proponent to determine areas that shall require paleontological monitoring during initial ground disturbance. The location of construction activities likely to encounter subsurface sediments with high paleontological sensitivity shall be determined by the qualified paleontologist upon review of project excavation and grading plans. Very shallow surficial excavations, less than 5 feet in depth, within areas of previous disturbance or areas of Quaternary</p>	<p>Less than significant</p>

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>younger alluvial deposits shall be monitored on a part-time basis to ensure that underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring.</p> <p>If excavations for the project take place in Quaternary older alluvial deposits or within Fernando Formation bedrock these excavations shall be monitored on a fulltime basis by a qualified paleontological monitor under the supervision of the qualified paleontologist. This paleontological resource monitoring shall include inspection of exposed rock units during active excavations within the geologically sensitive sediments. Monitoring may be reduced if some of the potentially fossiliferous units described herein are determined upon exposure and examination by qualified paleontologic personnel to have low potential to contain fossil resources.</p>	
<b>Geology and Soils</b>			
<p>The alternative would place people in an area known to have seismic hazards related to earthquakes.</p>	<p>Significant</p>	<p><b>G-1:</b> Construction and structural design of the project shall comply with all of the geotechnical recommendations, including design measures, provided in the geotechnical engineering report prepared for the project as described below:</p> <ul style="list-style-type: none"> <li>• Each build alternative shall follow the August 2004 geotechnical report's general recommendation of new structures being founded on spread footing foundations and/or Cast-In-Drilled-Hole (CIDH) pile foundations. The specifications for Cast-in-Drilled Hole Pile Construction, Retaining Walls, Slab-on-Grade, and Cement and Asphalt Pavements shall be followed where applicable under all build alternatives.</li> <li>• Under each build alternative, where applicable, the existing Parker Center foundation walls shall be structurally evaluated to determine their capability to resist unbalanced earth loads that will occur as the result of adjacent excavation, and shoring shall be installed to provide lateral support where needed.</li> <li>• All build alternatives shall follow the specifications in the August 2004 geotechnical report regarding site preparation and earthwork, where applicable.</li> </ul>	<p>Less than significant</p>

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<ul style="list-style-type: none"> <li>The general specification for Structure Foundations, as described in the August 2004 geotechnical report, will be considered appropriate, with probable minor modifications to minimum sizes and total expected settlement, depending on the Build Alternative that is selected. The given soil specifications, such as allowable bearing pressures and coefficients of friction, shall be similar to those used for the build alternatives.</li> </ul>	
Construction of the proposed alternative would result in soil erosion, which would be reduced with implementation of stormwater pollution-control Best Management Practices.	Less than significant	None	Less than significant
<b>Hazards and Hazardous Materials</b>			
The alternative could encounter or disturb contaminated soils during construction.	Significant	<p><b>HM-1:</b> Soils that have visible staining or an odor shall first be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) or other field equipment for volatile components, which require additional considerations in their handling. Soil with OVA readings exceeding 50 parts per million (ppm) volatile organic compounds (probe held 3 inches from the excavated soil face), or which is visibly stained or has a detectable petrochemical odor shall be stockpiled by the contractor separately from non-contaminated soils. The stockpiles shall be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6 millimeter nominal thickness and tested at 100 psi strength). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids.</p> <p><b>HM-2:</b> The soil shall then be sampled in a random and representative manner. To establish waste classification, samples shall be analyzed for total recoverable petroleum hydrocarbons (TRPH), volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH) as gasoline or diesel if these fuels are found in the area, Title 22 heavy</p>	Less than significant

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>metals, reactivity (pH), corrosivity, and toxicity. The number of samples shall depend upon the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity shall determine the amount of soil that can be stockpiled.</p> <p><b>HM-3:</b> If VOCs are present at concentrations exceeding 50 ppm, a permit from the South Coast Air Quality Management District (SCAQMD) shall be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The contractor shall obtain all necessary permits.</p> <p><b>HM-4:</b> Suspected contaminated soil samples shall be taken to a state-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry in accordance with appropriate testing methods. Materials with elevated levels of TRPH, metals or other regulated contaminants shall require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling.</p> <p><b>HM-5:</b> Any contaminated material (soil, asphalt, railroad ballast, concrete, or debris) that is to be hauled off-site and is considered a "waste product" shall be classified as hazardous or nonhazardous waste under all criteria by both state and federal codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest shall be prepared by the contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility shall be used if no hazardous constituents are present above their respective action levels.</p>	
<p>During construction, the alternative could encounter contaminated groundwater underlying the project site.</p>	<p>Significant</p>	<p><b>HM-6:</b> In the event groundwater is encountered during construction, dewatering shall be minimized, sufficient to remove interior or nuisance water from structures. Sampling ports shall be provided in the dewatering system. The produced water shall be required to be</p>	<p>Less than significant</p>

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>temporarily stored in large Baker-type tanks and analyzed by a state-certified environmental laboratory selected by the contractor. If the groundwater quality falls within guidelines established by the City Department of Public Works, Bureau of Sanitation, a permit shall be obtained to discharge the water into a nearby sewer.</p> <p><b>HM-7:</b> If hydrocarbon or other water contamination precludes this, the contaminated groundwater water shall be treated onsite (such as in an oil-water separator) or hauled off-site for treatment and disposal in accordance with applicable regulations by a licensed professional.</p>	
<p>Construction of the proposed alternative could result in the upset of asbestos containing materials and lead-based paint that may be present in existing structures on the site.</p>	<p>Significant</p>	<p><b>HM-8:</b> Prior to demolition activities, all structures within the project site shall be surveyed for asbestos-containing materials (ACMs) and lead-based paint by a licensed professional. All tests shall be performed in accordance with generally accepted testing laboratory methods. Based on lab test results, appropriate measures for handling, removal, and disposal of these materials shall be developed as part of the survey investigation. Any demolition activities that would remove or disturb these materials shall implement the developed measures in accordance with applicable regulations. As required by law, the abatement contractor shall be a licensed professional.</p>	<p>Less than significant</p>
<b>Land Use and Planning</b>			
<p>The alternative would not result in the physical division of an established community.</p>	<p>No impact</p>	<p>None</p>	<p>No impact</p>
<p>The alternative would not result in conflicts with land use plans or habitat conservation plans.</p>	<p>No impact</p>	<p>None</p>	<p>No impact</p>
<b>Noise and Vibration</b>			
<p>The alternative would result in noise generated from construction equipment, but would not exceed thresholds.</p>	<p>Less than significant</p>	<p>None</p>	<p>Less than significant</p>

<b>Environmental Impact<sup>a</sup></b>	<b>Significance Before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
The alternative would result in vibration generated from construction equipment, but the amount of vibration would not be excessive.	Less than significant	None	Less than significant
The alternative would result in a permanent increase in ambient noise due to traffic, but the amount of noise would not be substantial.	Less than significant	None	Less than significant
The proposed alternative HVAC systems would not substantially increase noise.	Less than significant	None	Less than significant
The proposed alternative would not expose people to excessive noise due to proximity to an airport.	Less than significant	None	Less than significant
<b>Transportation and Traffic</b>			
The alternative would result in construction-related traffic and congestion due to truck and construction worker trips and occasional lane closures. On-street parking could be affected.	Less than significant	None	Less than significant
Operation of the alternative would result in a significant change in volume-to-capacity (V/C) ratio and level of service (LOS) for the future (2018) with-alternative scenario at one study intersection - Los Angeles Street/Temple Street intersection.	Significant	<p><b>TRANS-1: Implement comprehensive TDM and transit connectivity strategies.</b></p> <p>The applicant is proposing to implement comprehensive TDM and transit connectivity strategies in order to reduce additional project vehicle trips that would minimize traffic related impacts of the project. The TDM plan will promote the City's policies through strategies that reduce vehicular use by project employees and other users of the site (e.g. visitors) during peak periods to include transit and pedestrian-friendly amenities such as safe and walkable sidewalks.</p> <p>It should be noted that a preliminary TDM and transit connectivity plan would need to be submitted to LADOT for approval prior to the</p>	Less than significant

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>issuance of the project's first building permit, and a final TDM plan must be prepared and approved by LADOT prior to the issuance of the project's first certificate of occupancy. The goals of these plans would need to be identified in the final TDM plan or site design.</p> <ul style="list-style-type: none"> <li>• <b>Site Improvements</b> - The design and operation of the site to the extent feasible shall be designed into the project to emphasize: <ul style="list-style-type: none"> <li>○ A bicycle, transit, and pedestrian friendly environment.</li> <li>○ Preferential loading and unloading for carpools, high-occupancy vehicles (HOV), and taxis makes it more convenient and attractive to passengers.</li> <li>○ Wayfinding signage guides that direct people to different elements of a site.</li> <li>○ Carpool and vanpool parking shall be closest to the entrance of a building or on the first floor of a garage or structure to reward participants.</li> <li>○ Bicycle parking shall be convenient, plentiful, well lit and secure.</li> <li>○ Shower and locker facilities are an important part of the decision for an employee to bike to work.</li> <li>○ Enhanced pedestrian and bicycle pathways for convenient, direct and secure connections.</li> <li>○ Provision of a self-service bicycle repair area and shared tools for employees.</li> <li>○ Coordinate with LADOT to provide space for a future Integrated Mobility Hub (see TRANS-2)</li> </ul> </li> </ul> <p>It must be emphasized that integrating non-auto oriented improvements into the heart of the site rather than off to the side or in a remote corner are paramount to their success. Parking for bicycles shall be convenient and near the front door to facilities and be plentiful and well lit.</p> <ul style="list-style-type: none"> <li>• <b>Car-Sharing and Short Term Car Rental</b> – Provide on demand access to a fleet of cars for short duration or unexpected trips and provide a minimum of five spaces for a shared car program. These programs reduce the need for individual to own a car or perhaps a second one. They would enhance the transit oriented nature of the project because it would allow individuals working</li> </ul>	

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>and shopping at the site to rely on transit with the knowledge that an automobile is available with relative ease for those trips where transit or other modes are impractical. These programs save costs to individuals and businesses and could reduce the parking demand of the project.</p> <ul style="list-style-type: none"> <li>• <b>Bike Sharing</b> – Provide a bike sharing program. With bike sharing, individuals have access to a shared fleet of bicycles on an as-needed basis. It provides a good alternative to autos and because the regional bus fleet and rail systems are bike accessible, it provides a link to transit on both ends of a trip. An added benefit is reduced emissions due to fewer vehicle trips.</li> <li>• <b>Transportation Coordinator</b> – Provide a transportation coordinator (TC), which is a permanent on-site staff position assigned to administer the requirements of a TDM program. Under this strategy, a transportation management association (TMA) shall be formed onsite or the project could become a part of an existing TMA in the area that would help in promoting awareness of the available TDM strategies and creating Transportation Management Plans (TMP) for the employees and patrons of the site.</li> <li>• <b>Transportation Information Center</b> – Provide a Transportation Information Center (TIC), which is a centrally-located commuter information center where both the employees and visitors can obtain information regarding commute programs, and individuals could obtain real-time information for planning travel without using an automobile. Strategically placed kiosks can provide trip planning and real time bus and train arrival information for users. Providing real-time transit information allows users to know exactly when the next bus or train will arrive and is an important tool in enhancing transit system connectivity.</li> <li>• <b>Transit, Bike and Walk Promotions and Information Materials</b> – This shall include a commuter information packet (CIP), a commuter benefits brochure that contains complete information about various transportation benefits available to individuals, transportation/transit options, HOV programs</li> </ul>	

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>and discounts, bicycling amenities, transportation subsidies, and other elements that may be available. The CIP shall be written in multiple languages such as English, Spanish, and Chinese. The CIP shall be distributed to tenant employees, other building workers and occupants and at promotional events.</p> <ul style="list-style-type: none"> <li>• <b>Tenant Participation</b> – Under this strategy, the transportation coordinator shall facilitate tenant and employee awareness and participation in the TMP by distributing the information to tenants at least once each year.</li> <li>• <b>Carpooling and Rideshare Matching Opportunities</b> – This strategy shall coordinate ridesharing programs among various building tenants and their employees, provide ride-match services within the building or engage other ride-match facilitators (such as its tenants) to provide this service. It could be applied two different ways. One method is to make available “on the spot” ridesharing. This strategy maximizes trip flexibility for the individual because they do not need to make long term plans and commitments. There are a number of internet-based programs that could be used to match the mobility needs of travelers with drivers. The more traditional method would be to have the TMA provide an online daily and/or long-term commute ride-matching service to match interested patrons with carpools and vanpools. The rideshare matching services could also be extended to other employers in close proximity to the project site.</li> <li>• <b>Guaranteed Ride Home Program</b> – This strategy provides a guaranteed ride home program for (occupants/employees) who use a commute mode other than driving. Employers may establish their own program or contract this service with a public agency or private contractor.</li> <li>• <b>Transit Pass Sales</b> – Under this strategy employers or a central management operator can contract with the Metro to become authorized to directly sell transit passes to their on-site employees. In addition they could provide transportation subsidies to building occupants/employees who commute via non-motorized or non-single occupancy vehicle modes.</li> </ul>	

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<ul style="list-style-type: none"> <li>• <b>Commuter Benefits</b> – This strategy, pursuant to Internal Revenue Code Section 132 (f), states that employers should arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees.</li> <li>• <b>Flexible/Alternative Work Schedules and Telecommuting Programs</b> – With this strategy, employers allow employees to work flexible and alternative work schedules so that their arrival and departure to the site varies to reduce trips during peak periods. Telecommuting eliminates any trips to the site since the employee would be working off-site.</li> <li>• <b>Expanded DASH Service</b> – Provide additional service and/or capacity to the DASH downtown system via new routes to the project site. Contributions could be in the form of the purchase of new DASH vehicles or subsidy of service for a fixed period of time.</li> <li>• <b>Taxi Services</b> – Provide taxi services. Taxis provide on-demand mobility for short and medium length trips. Expanding the City’s “hail-a-taxi” demonstration program to the project site and surrounding area would provide convenient mobility alternatives for unscheduled or quick trips. In addition, taxis could and should be equipped to accept regional transit fare cards such as Metro TAP smart card technology. A single method of fare payment would greatly enhance non-auto oriented trip choices. Taxi services can also complement the guaranteed ride home program.</li> </ul> <p><b>TRANS-2: Integrated Mobility Hub.</b> LADOT has been awarded grant funds to implement shared-vehicle stations within Downtown Los Angeles. This program, known as the Integrated Mobility Hubs project, would provide secure bike parking and a fleet of shared bikes and cars in an attempt to enhance urban mobility and serve as an extension of the current transportation network. The program can provide a form of “on-demand” transportation supplying Downtown-area users with a convenient and reliable option for one or more of the legs of their commute while being environmentally friendly and furthering greenhouse gas emission reduction goals. For many, transit use is not often the most convenient</p>	

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>choice because station endpoints are often beyond desirable walking distances to a traveler's final destination. Integrated mobility hubs provide an opportunity to customize the first and last mile experience by providing the end-user with vehicle options that would meet their particular trip needs for that day. Providing more first or last mile mobility choices can lead to increased use of public transit and introduce new transit riders.</p> <p>Given the project's close proximity to Union Station, the Metro Gold Line Little Tokyo/Arts District station and several Metro bus stops, the project location is well suited for increased use of public transit by occupants of the project. To support the goals of the project's TDM plan and to expand the City's program, the project shall coordinate with LADOT to provide space for a Mobility Hub in a convenient location within or near the project site. The project can also potentially provide on-site parking spaces for the shared-car component of the Mobility Hubs program. The project shall also provide space that would accommodate bicycle parking, bicycle lockers, and shared bicycles. LADOT is currently working on an operating plan and assessment study for the Mobility Hubs project that will include specific sites, designs and blueprints for Mobility Hub stations. The results of this study will assist in determining the appropriate location and space needed to accommodate a Mobility Hub at the project site.</p> <p><b>TRANS-3: Transit/Pedestrian Enhancements</b></p> <p>The project shall provide a pedestrian friendly environment through sidewalk pavement reconstruction/improvements, and improved amenities such as landscaping and shading, particularly along the sidewalks.</p> <p><b>TRANS-4: Bike Plan Trust Fund</b></p> <p>The project shall contribute a one-time fixed-fee of \$250,000 to be deposited into the City's Bicycle Plan Trust Fund. These funds would be used by LADOT, in coordination with the Department of City Planning and Council District 14, to implement bicycle improvements within the Downtown area. However, improvements within Downtown that are consistent with the City's complete streets and smart growth policies would also be eligible expenses utilizing these funds.</p>	

Environmental Impact <sup>a</sup>	Significance Before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Utilities, Service Systems, and Energy</b>			
The alternative would generate wastewater flows, but would not require expansion of wastewater treatment facilities or increase demand for wastewater facilities beyond capacity.	Less than significant	None	Less than significant
The alternative would result in increased demand for water, but that demand would not exceed existing supplies or capacities.	Less than significant	None	Less than significant
The alternative would not alter the existing storm water drainage facilities serving the project site.	No impact	None	No impact
The alternative would generate solid waste during construction and operation. However, the amount of solid waste would not exceed permitted landfill capacity.	Less than significant	None	Less than significant
The alternative would result in an increase in energy usage. However, the increased usage would not exceed existing supplies or capacities, and the proposed alternative would not result in a wasteful use of energy.	Less than significant	None	Less than significant
<p><sup>a</sup> The Inter-Building Circulation Option is included under each of the build alternatives. If the impact is the same under the alternative with or without the option, then it is not described in this table. If the impact is different, then the option is described in this table.</p> <p>Source: ICF International, 2012.</p>			

**Table 1-3. Summary of Environmental Impacts of Alternative B2, Demolition, Rehabilitation, and Addition**

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
<b>Aesthetics</b>			
Construction and demolition would result in demolition of a portion of the Parker Center building, a visual/scenic resource. The proposed addition would be slightly taller than the existing Parker Center building and would have a sympathetic design character.	Less than significant	None	Less than significant
The proposed addition would block views of the Parker Center building from the northeast and north. However, office workers are not considered to be a sensitive viewing group.	Less than significant	None	Less than significant
Construction and operation would result in a change to the visual character of the project site as a new structure would be placed on the site. However, the proposed building addition would be consistent with the heights and design of other nearby government high-rise office buildings in the Civic Center area.	Less than significant	None	Less than significant
The proposed addition would create of a source of shade/shadow, but would not shade any sensitive properties such as Bowron Square.	Less than significant	None	Less than significant.

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
<b>Air Quality and Greenhouse Gas Emissions</b>			
<p>Construction would result in ROC, NO<sub>x</sub>, and PM<sub>2.5</sub> pollutant emissions that would exceed SCAQMD thresholds.</p> <p><u>Inter-Building Circulation Option:</u> Construction would result in ROC, NO<sub>x</sub>, and PM<sub>2.5</sub> emissions that would exceed SCAQMD thresholds.</p>	Significant	<p><b>AQ-1</b> (See Table 1-2 above) <b>AQ-2</b> (See Table 1-2 above) <b>AQ-3</b> (See Table 1-2 above) <b>AQ-4</b> (See Table 1-2 above) <b>AQ-5</b> (See Table 1-2 above)</p>	<p>Less than significant</p> <p><u>Inter-Building Circulation Option:</u> Significant and Unavoidable</p>
<p>Operations would result in operational mobile-source emissions of NO<sub>x</sub> due to increases in traffic that would exceed SCAQMD thresholds.</p>	Significant	None	Significant and unavoidable
<p>The alternative would result in increased greenhouse gas emissions, which would have a cumulatively considerable contribution to the effects of climate change.</p>	Significant	<p><b>GHG-1</b> (See Table 1-2 above) <b>GHG-2</b> (See Table 1-2 above) <b>GHG-3</b> (See Table 1-2 above)</p>	Less than significant
<b>Cultural Resources</b>			
<p>This alternative would result the same impacts as described above for Alternative B1. In addition, the demolition of the jail wing would prevent the resource from conveying the aspect of its significance that is tied to its half century of service as a jail. Although its architectural significance would continue to be conveyed, other aspects of its significance would no longer be conveyed due to the removal of historic fabric.</p>	Significant	<p><b>HR-1:</b> (See Table 1-2 above) <b>HR-2:</b> (See Table 1-2 above) <b>HR-3:</b> (See Table 1-2 above) <b>HR-4:</b> Based on the HABS/HALS documentation, the City shall create a display interpreting the building's significance and displaying it in the public spaces of the building within a month of the issuance of the Certificate of Occupancy.</p>	<p>Significant and Unavoidable</p> <p>Parker Center would retain the character-defining features that are essential to conveying its significance for architecture and would retain its eligibility for the National Register of</p>

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
			Historic Places and the California Register of Historical Resources, but the removal of some of its historic fabric remains a significant and unavoidable impact
The alternative would result in indirect impact to other historical resources in the study area due to demolition of a portion of the Parker Center building. However, this would be a minor and temporary change to the setting of the historical resources in the study area.	Less than significant	None	Less than significant
Excavation has the potential to encounter unknown significant archaeological resources.	Significant	<b>ARC-1</b> (See Table 1-2 above)	Less than significant
Excavation has the potential to disturb unknown significant paleontological resources.	Significant	<b>PR-1</b> (See Table 1-2 above)	Less than significant
<b>Geology and Soils</b>			
The alternative would place people in an area known to have seismic hazards related to earthquakes.	Significant	<b>G-1</b> (See Table 1-2 above)	Less than significant
Construction of the proposed alternative would result in soil erosion, which would be reduced with implementation of stormwater pollution-control Best Management Practices.	Less than significant	None	Less than significant

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
<b>Hazards and Hazardous Materials</b>			
The alternative could encounter or disturb contaminated soils during construction.	Significant	<b>HM-1</b> (See Table 1-2 above) <b>HM-2</b> (See Table 1-2 above) <b>HM-3</b> (See Table 1-2 above) <b>HM-4</b> (See Table 1-2 above) <b>HM-5</b> (See Table 1-2 above)	Less than significant
During construction, the alternative could encounter contaminated groundwater underlying the project site.	Significant	<b>HM-6</b> (See Table 1-2 above) <b>HM-7</b> (See Table 1-2 above)	Less than significant
Construction of the proposed alternative could result in the upset of asbestos containing materials and lead-based paint that may be present in existing structures on the site.	Significant	<b>HM-8</b> (See Table 1-2 above)	Less than significant
<b>Land Use and Planning</b>			
The alternative would not result in the physical division of an established community.	No impact	None	No impact
The alternative would not result in conflicts with land use plans or habitat conservation plans.	No impact	None	No impact
<b>Noise and Vibration</b>			
The alternative would result in noise generated from construction equipment, but would not exceed thresholds.	Less than significant	None	Less than significant
The alternative would result in vibration generated from construction equipment, but the amount of vibration would not be excessive.	Less than significant	None	Less than significant

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
The alternative would result in a permanent increase in ambient noise due to traffic, but the amount of noise would not be substantial.	Less than significant	None	Less than significant
The proposed alternative HVAC systems would not substantially increase noise.	Less than significant	None	Less than significant
The proposed alternative would not expose people to excessive noise due to proximity to an airport.	Less than significant	None	Less than significant
<b>Transportation and Traffic</b>			
The alternative would result in construction-related traffic and congestion due to truck and construction worker trips and occasional lane closures. On-street parking could be affected.	Less than significant	None	Less than significant
Operation of the alternative would result in a significant change in V/C ratio and LOS for the future (2018) with-alternative scenario at two study intersections: Los Angeles Street/Temple Street intersection and Alameda Street/Temple Street intersection.	Significant	<p><b>TRANS-1</b> (See Table 1-2 above)  <b>TRANS-2</b> (See Table 1-2 above)  <b>TRANS-3</b> (See Table 1-2 above)  <b>TRANS-4</b> (See Table 1-2 above)  <b>TRANS-5: Upgrade traffic signals at seven study intersections and three adjacent locations.</b> As described in Section 4.8.3.1, Methodology, under the Traffic Signal Updates, if traffic signal upgrades are proposed as a mitigation to offset the significant traffic impacts of a development project, LADOT may require that not only the impacted intersections, but also any intersections in the immediate vicinity as determined by LADOT, be upgraded by the project to qualify for the intersection V/C reduction of 0.01.</p> <p>In order to mitigate the significant impacts at the study intersections, traffic signal upgrades are recommended at the following study intersections and at locations adjacent to the study intersections.</p>	Significant

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
		<p><u>Affected Study Intersections</u></p> <ul style="list-style-type: none"> <li>• Judge John Aiso Street and Temple Street (2070 controller upgrade and installation of system loops on all approaches)</li> <li>• 1st Street and Judge John Aiso Street/San Pedro Street (2070 controller upgrade and installation of system loops on all approaches)</li> </ul> <p><u>Non-Affected Study Intersections</u></p> <ul style="list-style-type: none"> <li>• 1st Street and Central Avenue (2070 controller upgrade and installation of system loops on all approaches)</li> <li>• 2nd Street and San Pedro Street (2070 controller upgrade and installation of system loops on all approaches)</li> <li>• 2nd Street and Central Avenue (2070 controller upgrade and installation of system loops on all approaches)</li> <li>• 2nd Street and Alameda Street (2070 controller upgrade and installation of system loops on all approaches)</li> <li>• 3rd Street and Los Angeles Street (2070 controller upgrade only)</li> </ul> <p><u>Non-Study Intersections/Locations</u></p> <ul style="list-style-type: none"> <li>• 1st Street and Hill Street (2070 controller upgrade only)</li> <li>• 1st Street between San Pedro Street and Central Avenue (2070 controller upgrade only)</li> <li>• 3rd Street and Alameda Street (2070 controller upgrade only)</li> </ul>	
<b>Utilities, Service Systems, and Energy</b>			
The alternative would generate wastewater flows, but would not require expansion of wastewater treatment facilities or increase demand for wastewater facilities beyond capacity.	Less than significant	None	Less than significant
The alternative would result in increased demand for water, but that demand would not exceed existing supplies or capacities.	Less than significant	None	Less than significant

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
The alternative would not alter the existing storm water drainage facilities serving the project site.	No impact	None	No impact
The alternative would generate solid waste during construction and operation. However, the amount of solid waste would not exceed permitted landfill capacity.	Less than significant	None	Less than significant
The alternative would result in an increase in energy usage. However, the increased usage would not exceed existing supplies or capacities, and the proposed alternative would not result in a wasteful use of energy.	Less than significant	None	Less than significant
<sup>a</sup> The Inter-Building Circulation Option is included under each of the build alternatives. If the impact is the same under the alternative with or without the option, then it is not described in this table. If the impact is different, then the option is described in this table.			
Source: ICF International, 2012.			

**Table 1-4. Summary of Environmental Impacts of Alternative B3, Demolition and Build**

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
<b>Aesthetics</b>			
This alternative would result in the demolition of the Parker Center building, a visual/scenic resource.	Significant	None	Significant and unavoidable
The new building would result in changes to the existing sight lines to the project site both to the east and north, resulting in impacts to visual quality. However, the proposed office use and design would be consistent with surrounding development.	Less than significant	None	Less than significant
The proposed building would create of a new source of shade/shadow on Bowron Square.	Significant	None	Significant and unavoidable
<b>Air Quality and Greenhouse Gas Emissions</b>			
Construction of the alternative would result in VOC, NO <sub>x</sub> , and PM <sub>2.5</sub> , due to increases in traffic, pollutant emissions that would exceed SCAQMD thresholds. <u>Inter-Building Circulation Option:</u> Construction would result in VOC, NO <sub>x</sub> and PM <sub>2.5</sub> emissions that would exceed SCAQMD thresholds.	Significant	AQ-1 (See Table 1-2 above) AQ-2 (See Table 1-2 above) AQ-3 (See Table 1-2 above) AQ-4 (See Table 1-2 above) AQ-5 (See Table 1-2 above)	Less than significant <u>Inter-Building Circulation Option:</u> Significant and Unavoidable

<b>Environmental Impact<sup>a</sup></b>	<b>Significance Determination</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
Operation of the alternative would result in mobile-source ROC and NO <sub>x</sub> pollutant emissions that would exceed SCAQMD thresholds.	Significant	None	Significant and unavoidable
The alternative would result in increased greenhouse gas emissions, which would have a cumulatively considerable contribution to the effects of climate change.	Significant	<b>GHG-1</b> (See Table 1-2 above) <b>GHG-2</b> (See Table 1-2 above) <b>GHG-3</b> (See Table 1-2 above)	Less than significant
<b>Cultural Resources</b>			
This alternative would result demolition of the Parker Center building and its remaining associated landscape features.	Significant	<b>HR-3:</b> (See Table 1-2 above) <b>HR-4:</b> (See Table 1-3 above) <b>HR-5:</b> The City shall document Parker Center according to HABS/HALS guidelines before demolition takes place. <b>HR-6:</b> The City shall incorporate Parker Center’s original public art pieces, “Theme Mural of Los Angeles” and “Family Group,” into the design and setting of the new building. These public art elements shall be installed at the time of issuance of the Certificate of Occupancy.	Significant and unavoidable
The alternative would result in indirect impacts to the Los Angeles Civic Center Historic District because Parker Center would no longer convey its significance as a police facility within the District, resulting in a substantial adverse change in the historic significance of the district.	Significant	None	Significant and unavoidable
Excavation has the potential to encounter significant unknown archaeological resources.	Significant	<b>ARC-1</b> (See Table 1-2 above)	Less than significant

<b>Environmental Impact <sup>a</sup></b>	<b>Significance Determination</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
Excavation has the potential to disturb unknown significant paleontological resources.	Significant	<b>PR-1</b> (See Table 1-2 above)	Less than significant
<b>Geology and Soils</b>			
The alternative would place people in an area known to have seismic hazards related to earthquakes.	Significant	<b>G-1</b> (See Table 1-2 above)	Less than significant
Construction of the proposed alternative would result in soil erosion, which would be reduced with implementation of stormwater pollution-control Best Management Practices.	Less than significant	<b>None</b>	Less than significant
<b>Hazards and Hazardous Materials</b>			
The alternative could encounter or disturb contaminated soils during construction.	Significant	<b>HM-1</b> (See Table 1-2 above) <b>HM-2</b> (See Table 1-2 above) <b>HM-3</b> (See Table 1-2 above) <b>HM-4</b> (See Table 1-2 above) <b>HM-5</b> (See Table 1-2 above)	Less than significant
During construction, the alternative could encounter contaminated groundwater underlying the project site.	Significant	<b>HM-6</b> (See Table 1-2 above) <b>HM-7</b> (See Table 1-2 above)	Less than significant
Construction of the proposed alternative could result in the upset of asbestos containing materials and lead-based paint that may be present in existing structures on the site.	Significant	<b>HM-8</b> (See Table 1-2 above)	Less than significant

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
<b>Land Use and Planning</b>			
The alternative would not result in the physical division of an established community.	No impact	None	No impact
The alternative would conflict with land use policies in the Central City Community Plan that address the reuse of historic buildings.	Significant	None	Significant
<b>Noise and Vibration</b>			
The alternative would result in noise generated from construction equipment, but would not exceed thresholds.	Less than significant	None	Less than significant
The alternative would result in vibration generated from construction equipment, but the amount of vibration would not be excessive.	Less than significant	None	Less than significant
The alternative would result in a permanent increase in ambient noise due to traffic, but the amount of noise would not be substantial.	Less than significant	None	Less than significant
The proposed alternative HVAC systems would not substantially increase noise.	Less than significant	None	Less than significant
The proposed alternative would not expose people to excessive noise due to proximity to an airport.	Less than significant	None	Less than significant

Environmental Impact <sup>a</sup>	Significance Determination	Mitigation Measures	Significance after Mitigation
<b>Transportation and Traffic</b>			
Construction related traffic and congestion due to truck and construction worker trips and occasional lane closures. On-street parking could be affected.	Less than significant	None	Less than significant
Operation would result in a significant change in V/C ratio and LOS for the future (2018) with-alternative scenario at six study intersections: Los Angeles Street/Temple Street intersection, Judge John Aiso Street/Temple Street intersection, Alameda Street/Temple Street intersection, Main Street/1 <sup>st</sup> Street intersection, Los Angeles Street/1 <sup>st</sup> Street intersection, Judge John Aiso Street/San Pedro Street/1 <sup>st</sup> Street intersection.	Significant	<b>TRANS-1:</b> (See Table 1-2 above) <b>TRANS-2:</b> (See Table 1-2 above) <b>TRANS-3</b> (See Table 1-2 above) <b>TRANS-4</b> (See Table 1-2 above) <b>TRANS-5</b> (See Table 1-3 above)	Significant
<b>Utilities, Service Systems, and Energy</b>			
The alternative would generate wastewater flows, but would not require expansion of wastewater treatment facilities or increase demand for wastewater facilities beyond capacity.	Less than significant	None	Less than significant
The alternative would result in increased demand for water, but that demand would not exceed existing supplies or capacities.	Less than significant	None	Less than significant

<b>Environmental Impact <sup>a</sup></b>	<b>Significance Determination</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
The alternative would not alter the existing storm water drainage facilities serving the project site.	No impact	None	No impact
The alternative would generate solid waste during construction and operation. However, the amount of solid waste would not exceed permitted landfill capacity.	Less than significant	None	Less than significant
The alternative would result in an increase in energy usage. However, the increased usage would not exceed existing supplies or capacities, and the proposed alternative would not result in a wasteful use of energy	Less than significant	None	Less than significant
<p><sup>a</sup> The Inter-Building Circulation Option is included under each of the build alternatives. If the impact is the same under the alternative with or without the option, then it is not described in this table. If the impact is different, then the option is described in this table.</p>			
<p>Source: ICF International, 2012.</p>			

## 1.6 Environmentally Superior Alternative

Based upon the analysis presented in this EIR, the No Project Alternative (Alternative A) would result in fewer impacts on the existing environment. However, Section 15126.6(e)(2) of the State CEQA Guidelines states if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the alternatives analysis summarized in Table 1-1, Comparison of Alternatives, the environmentally superior alternative is Alternative B1, Rehabilitation. However, Alternative B1 would be the least effective alternative at satisfying the project objectives because it would provide the least amount of floor area to relocate City services. Alternative B3 would best satisfy the project objectives because the greatest number of City employees could be relocated under this alternative and a new building would provide better fire-life safety and seismic safety features and comply with the City's Green Building Code.

In addition, Alternative B3 provides greater flexibility with respect to office layouts. The floor plate under Alternative B3 would be large enough to provide both private offices and open workstations at a minimum of four deep in an uninterrupted manner. Alternative B1 has a narrower floor plate that does not support space efficiency. Alternative B2 has greater space efficiency than Alternative B1, but is limited when compared to Alternative B3. Overall, Alternative B3 supports the most efficient office space of the three build alternatives. Lastly, Alternative B3 is would have a greater floor-area ratio than the other build alternatives and, as such, would be more cost-efficient to operate.

A more detailed discussion of the environmentally superior alternative is provided in Chapter 5, Comparison of Alternatives.

## TRANSMITTAL 2

# LOS ANGELES STREET CIVIC BUILDING PROJECT FINAL ENVIRONMENTAL IMPACT REPORT Issued June 12, 2014

(The size of this document exceeds what is allowed for electronic transmission. You may tap on the link below or cut and paste in your browser for access to the file)

[http://eng.lacity.org/techdocs/emg/docs/LA\\_Street\\_Civic\\_Bldg\\_Final\\_EIR\\_June\\_2014.pdf](http://eng.lacity.org/techdocs/emg/docs/LA_Street_Civic_Bldg_Final_EIR_June_2014.pdf)

# Findings of Fact and Statement of Overriding Considerations

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for the  
Los Angeles Street Civic Building Project

**SCH # 2012051030**

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June 2014



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# 1 Introduction

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

## 1.1 Purpose of Findings and the Statement of Overriding Considerations

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

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

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

The Statement of Overriding Considerations is a written statement explaining the specific reasons why the social, economic, legal, technical or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts and why the Lead Agency is willing to accept such impacts. This statement shall be based on the final EIR and/or other substantial evidence in the record.

## 1.2 Overview of the Proposed Project

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

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

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

The objectives of the Project are as follows:

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

## 1.3 Document Organization

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

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

## 2 Statement of Environmental Effects and Required Findings

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

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

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

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

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

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

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

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

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

- Aesthetics: The Parker Center building is considered to be a visual/historic resource. The proposed project would result in demolition of the Parker Center resource, a significant and unavoidable impact. In addition, under the proposed project, the proposed Civic Center building would create a new source of shade/shadow on Bowron Square, a significant and unavoidable impact.
- Air Quality and Greenhouse Gas Emissions: While construction emissions of reactive organic compounds (ROC), nitrous oxide (NO<sub>x</sub>), and particulate matter (PM<sub>2.5</sub>), could be mitigated to less-than-significant levels per SCAQMD thresholds, construction of the optional inter-building circulation tunnel would result in substantial emissions of ROC, NO<sub>x</sub>, and PM<sub>2.5</sub>, cannot be mitigated to less-than-significant levels. In addition, operation of the proposed project would result in mobile-source ROC and NO<sub>x</sub> pollutant emissions that would exceed South Coast Air Quality Management District (SCAQMD) thresholds. This impact would be significant and unavoidable.
- Cultural Resources: The Parker Center building is considered to be an historical resource and the proposed project would result in demolition of this building, a significant unavoidable impact. In addition, demolition of the Parker Center building and replacement with a new civic building, would result in indirect impacts to the Los Angeles Civic Center Historic District because Parker Center would no longer convey its significance as a police facility within the District, resulting in a substantial adverse change in the historic significance of the district, a significant and unavoidable impact.
- Land Use and Planning: Because the Parker Center building, an historic building, would be demolished under the proposed project, the Project would conflict with land use policies in the Central City Community Plan that promote preservation and reuse of historic buildings. This would be a significant and unavoidable impact.
- Transportation and Traffic: Operation of the Project would result in a significant change in volume/capacity (V/C) ratio and level of service (LOS) in the 2018 future scenario at six study intersections: Los Angeles Street/Temple Street interaction, Judge John Aiso Street/Temple Street intersection, Alameda Street/Temple Street intersection, Main

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

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

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

## 2.1 Aesthetics

### 2.1.1 Description of Potential Effects

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

### 2.1.2 Mitigation Measures

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

### 2.1.3 Findings

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

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

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

Significant  Not Significant

### 2.1.4 Rationale

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

### 2.1.5 References

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

## 2.2 Air Quality and Greenhouse Gas Emissions

### 2.2.1 Description of Potential Effects

Construction of the proposed project would result in regional NO<sub>x</sub> emissions that would be significant and unavoidable with the bridge or tunnel Inter-Building Circulation Option. Localized impacts related to short-term emissions of PM<sub>10</sub> and PM<sub>2.5</sub> during construction would be significant and unavoidable after implementation of mitigation measures.

Impacts related to NO<sub>x</sub> emissions during long-term project operations would be significant and unavoidable. This is because no project-level mitigation measures are available that would reduce mobile-source emissions. In addition, the proposed project would result in increased greenhouse gas (GHG) emissions over existing conditions, which could have a cumulatively considerable contribution to the effects of climate change. As such, potential impacts related to project GHG emissions would be significant prior to implementation of mitigation measures.

## 2.2.2 Mitigation Measures

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

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

**AQ-2:** Construction-period Haul Trucks – Model year 2010 and newer diesel haul trucks shall be used for material delivery trucks and soil import/export; if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> and PM emissions requirements.

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

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

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

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

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



project, operation of the project would result in significant and unavoidable impacts that cannot be mitigated without compromising the objectives of the Project. While other alternatives analyzed in the EIR would result in reduced air quality impacts, the proposed project would best meet the project objectives and is the most cost effective alternative considered.

## 2.2.5 References

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

## 2.3 Cultural Resources

### 2.3.1 Description of Potential Effects

#### Historic Resources

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

#### *Cumulative Impacts*

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

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

#### *Design Work of Welton Becket in the Los Angeles Area*

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

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

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

### **Archaeological Resources**

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

### **Paleontological Resources**

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

## **2.3.2 Mitigation Measures**

### **Historic Resources**

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

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

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

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

**HR-7:** The City shall incorporate Parker Center's original public art pieces, "Theme Mural of Los Angeles" and "Family Group," into the design and setting of the new building or the police headquarters building on 1<sup>st</sup> Street. These public art elements shall be installed at the time of issuance of the Certificate of Occupancy.

## Archaeological Resources

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

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

## Paleontological Resources

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

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

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

The paleontologic monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily divert grading away from exposed fossils in order to

professionally and efficiently recover the fossil specimens and collect associated data. All efforts to avoid delays in project schedules shall be made. To prevent construction delays, paleontological monitors shall be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment shall include handheld global positioning system receivers, digital cameras, and cell phones, as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (awls, hammers, chisels, shovels, etc.), and plaster kits. At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis.

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

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

### 2.3.3 Findings

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

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

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

- Significant  Not Significant

### 2.3.4 Rationale

Impacts associated with Project construction would be mitigated with implementation of the above listed mitigation measures; however, these mitigation measures cannot reduce the impact of demolishing the Parker Center building. No additional mitigation can reduce this impact to a less-than-significant level and meet the project objectives. While other alternatives analyzed in the EIR would result in reduced impacts to the Parker Center building, the proposed project would best meet the project objectives and is the most cost effective alternative considered.

### 2.3.5 References

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

## 2.4 Geology and Soils

### 2.4.1 Description of Potential Effects

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

### 2.4.2 Mitigation Measures

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

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

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

### 2.4.3 Findings

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

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

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

- Significant  Not Significant

### 2.4.4 Rationale

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

### 2.4.5 References

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

## 2.5 Hazards and Hazardous Materials

### 2.5.1 Description of Potential Effects

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

## 2.5.2 Mitigation Measures

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

### Soil Contamination

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

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

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

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

**HM-5:** Any contaminated material (soil, asphalt, railroad ballast, concrete, or debris) that is to be hauled off-site and is considered a "waste product" shall be classified as hazardous or nonhazardous waste under all criteria by both state and federal codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest shall be prepared by the contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility shall be used if no hazardous constituents are present above their respective action levels.

## Groundwater Contamination

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

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

## Asbestos Containing Materials and Lead-Based Paint

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

### 2.5.3 Findings

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

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

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

Significant  Not Significant

## 2.5.4 Rationale

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

## 2.5.5 References

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

## 2.6 Land Use and Planning

### 2.6.1 Description of Potential Effects

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

### 2.6.2 Mitigation Measures

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

### 2.6.3 Findings

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

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

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

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

- Significant  Not Significant

## 2.6.4 Rationale

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

## 2.6.5 References

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

## 2.7 Noise and Vibration

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

## 2.8 Transportation and Traffic

### 2.8.1 Description of Potential Effects

Operation of the Project would result in a substantial projected (2018) increase in V/C ratio at six intersections. Based on LADOT's significant impact thresholds, the proposed project would result in a significant traffic impact at the following intersections under the future with project condition:

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

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

- Los Angeles Street and Temple Street

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

## 2.8.2 Mitigation Measures

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

- Los Angeles Street and Temple Street
- Alameda Street and Temple Street

There is one significantly affected intersection under the Existing with project condition. After implementation of Mitigation Measures TRANS-1 through TRANS-5, the project traffic impact at the intersection of Los Angeles Street and Temple Street would remain significant.

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

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

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

- **Site Improvements** - The design and operation of the site to the extent feasible shall be designed into the project to emphasize:
  - A bicycle, transit, and pedestrian friendly environment.

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

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

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

bus and train arrival information for users. Providing real-time transit information allows users to know exactly when the next bus or train will arrive and is an important tool in enhancing transit system connectivity.

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

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

### **TRANS-2: Integrated Mobility Hub.**

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

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

### **TRANS-3: Transit/Pedestrian Enhancements**

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

**TRANS-4: Bike Plan Trust Fund**

The project shall contribute a one-time fixed-fee of \$250,000 to be deposited into the City's Bicycle Plan Trust Fund. These funds would be used by LADOT, in coordination with the Department of City Planning and Council District 14, to implement bicycle improvements within the Downtown area. However, improvements within Downtown that are consistent with the City's complete streets and smart growth policies would also be eligible expenses utilizing these funds.

**TRANS-5: Upgrade traffic signals at seven study intersections and three adjacent locations.**

As described in Section 4.8.3.1, Methodology, under the Traffic Signal Upgrades, if traffic signal upgrades are proposed as a mitigation to offset the significant traffic impacts of a development project, LADOT may require that not only the impacted intersections, but also any intersections in the immediate vicinity as determined by LADOT, be upgraded by the project to qualify for the intersection V/C reduction of 0.01.

In order to mitigate the significant impacts at the study intersections, traffic signal upgrades are recommended at the following study intersections and at locations adjacent to the study intersections.

Affected Study Intersections

- Judge John Aiso Street and Temple Street (2070 controller upgrade and installation of system loops on all approaches)
- 1st Street and Judge John Aiso Street/San Pedro Street (2070 controller upgrade and installation of system loops on all approaches)

Non-Affected Study Intersections

- 1st Street and Central Avenue (2070 controller upgrade and installation of system loops on all approaches)
- 2nd Street and San Pedro Street (2070 controller upgrade and installation of system loops on all approaches)
- 2nd Street and Central Avenue (2070 controller upgrade and installation of system loops on all approaches)
- 2nd Street and Alameda Street (2070 controller upgrade and installation of system loops on all approaches)
- 3rd Street and Los Angeles Street (2070 controller upgrade only)

Non-Study Intersections/Locations

- 1st Street and Hill Street (2070 controller upgrade only)
- 1st Street between San Pedro Street and Central Avenue (2070 controller upgrade only)
- 3rd Street and Alameda Street (2070 controller upgrade only)

**2.8.3 Findings**

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

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

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

Significant  Not Significant

#### **2.8.4 Rationale**

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

#### **2.8.5 References**

Section 4.8 of the Draft EIR addresses the project's transportation and traffic impacts.

### **2.9 Utilities, Service Systems and Energy**

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

## **3 Alternatives Considered and Preferred Project**

Section 15126.6 of the CEQA Guidelines requires an evaluation of the comparative effects of a reasonable range of alternatives to the project that would feasibly attain most of the project's basic objectives and would avoid or substantially lessen any of the significant impacts of the project. A feasible alternative is one that can be accomplished successfully in a reasonable period of time, taking into consideration economic, legal, social, and technological factors. The range of alternatives is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasonable choice. Chapter 5, Comparison of Alternatives, of the Draft EIR discusses three project alternatives and the No Project alternative that were carried forward in detailed analyses. Draft EIR Chapter 5 also discussed several alternatives that were considered but not carried forward.

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

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

### **3.1 Alternatives Considered but Not Analyzed in the Draft EIR**

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

### **3.2 Alternatives Analyzed in the Draft EIR**

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

#### **Alternative A – No Project**

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

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

### **Alternative B1 – Rehabilitation**

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

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

### **Alternative B2 – Partial Demolition, Rehabilitation, and Addition**

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

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

## **3.3 Preferred Project**

This section presents the Preferred Project, which is the proposed project, including a discussion of the rationale for the selection and the benefits of the Preferred Project. The Preferred Project (described in the EIR as “Alternative B3 –Demolition and Build”) would demolish the existing Parker Center building and construct a new office building, which would consist of approximately 753,730 gross square feet, and approximately 1,173 parking spaces with a maximum height of approximately 450 feet. The proposed project would include office and commercial space, and a childcare facility. The proposed 753,730-square feet could be accommodated in one or two buildings on the site. The new building(s) could take on a variety of configurations, but would generally fill the footprint of the existing Parker Center building. Outdoor open space and a pedestrian connection between City Hall to the west, and the Little Tokyo neighborhood to the east and south would be provided. The Proposed project also includes an optional inter-building tunnel or bridge that would connect City Hall East to the new Civic Building.

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

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

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

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

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

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<sup>1</sup> Gross square feet.

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

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

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

### 3.4 Environmentally Superior Alternative

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

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

## 4 Statement of Overriding Considerations

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

- **Aesthetics:** The Parker Center building is considered a visual/historic resource. The proposed project would result in demolition of the Parker Center resource, a significant and unavoidable impact. In addition, under the proposed project, the proposed Civic Center building would create a new source of shade/shadow on Bowron Square, a significant and unavoidable impact.
- **Air Quality and Greenhouse Gas Emissions:** While construction emissions of reactive organic compounds (ROC), nitrous oxide (NO<sub>x</sub>), and particulate matter (PM<sub>2.5</sub>), could be mitigated to less-than-significant levels, construction of the optional inter-building circulation tunnel would result in substantial emissions of ROC, NO<sub>x</sub>, and PM<sub>2.5</sub>, cannot be mitigated to less-than-significant levels. In addition, operation of the proposed project would result in mobile-source ROC and NO<sub>x</sub> pollutant emissions that would exceed SCAQMD thresholds. This impact would be significant and unavoidable.
- **Cultural Resources:** The Parker Center building is considered to be an historical resource and the proposed project would result in demolition of this building, a significant unavoidable impact. In addition, demolition of the Parker Center building and replacement with a new civic building would result in indirect impacts to the Los Angeles Civic Center Historic District, because Parker Center would no longer convey its significance as a police facility within the District, resulting in a substantial adverse change in the historic significance of the district, a significant and unavoidable impact.
- **Land Use and Planning:** Because the Parker Center building, an historic building, would be demolished under the proposed project, the project would conflict with land use policies in the Central City Community Plan that promote preservation and reuse of historic buildings. This would be a significant and unavoidable impact.
- **Transportation and Traffic:** Operation of the project would result in a significant change in volume/capacity (V/C) ratio and level of service (LOS) in the 2018 future scenario at six study intersections: Los Angeles Street/Temple Street interaction, Judge John Aiso Street/Temple Street intersection, Alameda Street/Temple Street intersection, Main Street/1st Street intersection, Los Angeles Street/1st Street intersection, Judge John Aiso Street/San Pedro Street/1st Street intersection. This impact would be significant and unavoidable.

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

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

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

## LA Street Civic Building - Space Needs

Map	Department	Lease or City-Owned	Outstanding Debt 2014-15	Lease/Debt Expense 2014-15	Square Footage in current location and Headcount		Civic Center Office Space Needs w/L.A. Mall at 250,000 sq ft (excludes DOT at CalTrans and BOS Media Center; based on 200 sq ft per pos City space standards)	
					Current Sq Ft	Headcount	Required Sq Ft	Headcount
A	Bradbury (LAPD) (IAG)	Lease		\$ 949,829	40,591	150	30,000	150
B	Caltrans*	Lease		\$ 2,904,308	90,000	450	-	
C	City Hall South (GSD)	City-Owned		n/a	80,000	200	40,000	200
D	Figueroa (Aging)	City-Owned		n/a	12,120	34	6,800	34
D	Figueroa (Animal Services)	City-Owned		n/a	17,409	28	5,600	28
D,E	Figueroa (Bldg & Safety)*	City-Owned			143,381	508	101,600	508
E	Figueroa (BOE)	City-Owned			52,919	98	19,600	98
E	Figueroa (CAD)	City-Owned		n/a	11,172	31	6,200	31
E	Figueroa (DOD)	City-Owned			8,555	12	2,400	12
D,E	Figueroa (Fire)	City-Owned			15,577	70	14,000	70
E	Figueroa (LAPD)	City-Owned			37,817	130	26,000	130
D	Figueroa (RAP)*	City-Owned			60,559	215	43,000	215
D	Figueroa (available)	City-Owned			26,303	130	26,000	130
	Figueroa Plaza (386,000 incl	City-Owned	\$ 193,295,000	\$ 13,797,492			-	-
F	Garland (EWDD)*	Lease		\$ 1,918,915	41,836	193	38,600	193
F	Garland (Finance)	Lease		\$ 1,454,451	52,607	211	42,200	211
F	Garland (HCID)*	Lease		\$ 2,869,006	98,513	502	100,400	502
G	L.A. Mall (OPS)	City-Owned			10,000	50	10,000	50
H	LACERS*	Lease		\$ 934,000	35,000	139	27,800	139
I	Media Center*	Lease		\$ 1,220,000	61,000	322	-	
J	Paramount (Bldg Safety)	Lease		\$ 573,144	25,487	111	22,200	111
J	Paramount (LAPD BSS)	Lease		\$ 226,940	9,567	17	3,400	17
K	PENSIONS*	Lease		\$ 908,618	45,000	110	22,000	110
L	Personnel - Vignes	City-Owned			142,000	388	77,600	388
M	Public Works*	City-Owned	\$ 91,265,808	\$ 6,019,085	438,000	1,286	257,200	1,286
	Retail/Commercial Component				50,000		50,000	-
<b>Totals</b>			<b>\$ 284,560,808</b>	<b>\$ 33,775,788</b>	<b>1,605,413</b>	<b>5,385</b>	<b>972,600</b>	<b>4,613</b>
Growth/Expansion (assumed at 2 percent)							18,452	92
<b>Grand Total</b>							<b>991,052</b>	<b>4,705</b>
* Indicates departments with special funds and opportunity for cost-sharing								
Total sq ft between Fig Tower 1 and 2 is 385,812 or approximately 386,000								
Annual debt/lease costs expense excludes other costs associated with operations, utilities, maintenance and other costs								

# Los Angeles Civic Center Building

## Departments, Locations and Headcount

