Final Initial Study/
Mitigated Negative Declaration
for
1st & Broadway Civic Center Park Project
State Clearinghouse No. 2019011002

March 2019

City of Los Angeles
Department of Recreation and Parks
Department of Public Works
Bureau of Engineering
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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
MITIGATED NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

LEAD AGENCY AND ADDRESS: City of Los Angeles
                      c/o Los Angeles City Engineer
                      1149 Broadway, Suite 600
                      Los Angeles, CA 90015-2213

COUNCIL DISTRICT

PROJECT TITLE: 1st and Broadway Civic Center Park

T.G. Page 634, Grid F3 & G3

PROJECT LOCATION: The project site is located at the northeast corner of 1st Street and Broadway in the Civic Center area of downtown Los Angeles. The address is at 126 N. Broadway, Los Angeles, California 90012. The project site is generally bound by Los Angeles County's Grand Park adjacent on the north, Spring Street on the east, 1st Street on the south, and Broadway on the west. The project site is currently a vacant dirt lot that is fenced in to restrict access. The area immediately surrounding the project site is completely urbanized and developed with Grand Park and a Los Angeles County courthouse to the north, the Los Angeles City Hall and City Hall Park to the east, the Los Angeles Police Department Headquarters to the southeast, office buildings and the Times Mirror building (formerly the Los Angeles Times building) to the south, the Los Angeles Federal Courthouse to the southwest, and the Los Angeles Law Library to the west.

DESCRIPTION: In 2013, the City of Los Angeles acquired the project site from the State of California, with the intent to seek development opportunities that would reduce blight, and increase the health and safety at the site. The acquisition process included site demolition, and hazardous materials remediation and abatement activities. The project site is currently a vacant dirt lot that is used as a surface parking facility and holds occasional special events. The proposed project includes construction of a 1.96-acre park, featuring both landscaped and hardscaped areas to accommodate a wide variety of park activities, programs, and events, at the northeast corner of West 1st Street and Broadway in downtown Los Angeles. The proposed project would also include a new two-story, 19,200-square-foot building for restaurant uses. Other site improvements would include a bicycle parking area, outdoor seating areas, landscaping with a variety of plants and trees for public enjoyment, walking pathways and passive recreational uses, and new lighting. The intent of the proposed project is to create a world-class iconic park at the core of Los Angeles' Civic Center area. Construction of the proposed project would last for approximately two years beginning in Summer/Fall 2019 and concluding in Summer/Fall 2021.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The City Engineer of the City of Los Angeles has determined the proposed project will not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM: Talmage Jordan
ADDRESS: 1149 S. Broadway, Suite 600, MS 939
          Los Angeles, CA 90015

TELEPHONE NUMBER: (213) 485-5754

SIGNATURE (Official):
Maria Martin, Environmental Affairs Officer
Environmental Management Group

DATE: 12/31/2018
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Proposed Project

The City of Los Angeles (City) Department of Recreation and Parks (RAP) and City of Los Angeles Department of Public Works, Bureau of Engineering (BOE) are proposing to develop 1st and Broadway Civic Center Park Project (proposed Project). The proposed Project includes construction of a 1.96-acre park, featuring both landscaped and hardscaped areas to accommodate a wide variety of park activities, programs, and events, at the northeast corner of West 1st Street and Broadway in downtown Los Angeles. The proposed Project would also include a new two-story, 19,200-square-foot building for restaurant uses. Other site improvements would include a bicycle parking area, outdoor seating areas, landscaping with a variety of plants and trees for public enjoyment, walking pathways and passive recreational uses, and new lighting. The intent of the proposed Project is to create a world-class iconic park at the core of Los Angeles’ Civic Center area.

Determination

Based on the analysis provided in this Initial Study/Mitigated Negative Declaration (IS/MND), RAP and BOE find that, with incorporation of described revisions to the Project and mitigation measures, the proposed Project would not have a significant effect on the environment.
ORGANIZATION OF THE FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This Final IS/MND has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000 et. seq.) and the CEQA Guidelines (California Code of Regulations [CCR] 15000 et. seq.). This Final IS/MND is organized into the following sections:

**Clarifications and Modifications:** provides a detailed description of all clarifications and modifications that were made to the text or graphics of the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Clarifications and modifications reflect changes made to the proposed Project, analysis, or mitigation measures due to editorial changes or as a result of a comment made by an agency or individual during the public review period. These clarifications and modifications do not constitute significant new information and do not change any of the conclusions of the document. This section also reflects changes necessary to combine the Draft IS/MND into this Final IS/MND.

**Response to Comments on the Draft IS/MND:** provides a list of agencies, organizations, and individuals commenting on the Draft IS/MND; copies of the written comments received during the Draft IS/MND public review period; and the lead agency responses to those comments.

**Draft IS/MND:** This portion of the document includes the Draft IS/MND in its entirety, as was circulated during the public review period, which ran from January 3, 2019 through February 4, 2019.
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>CLARIFICATIONS AND MODIFICATIONS</td>
<td>CM-1</td>
</tr>
<tr>
<td>RESPONSE TO COMMENTS</td>
<td>RTC-1</td>
</tr>
<tr>
<td>INITIAL STUDY/MITIGATED NEGATIVE DECLARATION</td>
<td>MND-1</td>
</tr>
<tr>
<td>I. INTRODUCTION</td>
<td>MND-1</td>
</tr>
<tr>
<td>A. Purpose of an Initial Study</td>
<td>MND-1</td>
</tr>
<tr>
<td>B. Document Format</td>
<td>MND-2</td>
</tr>
<tr>
<td>C. CEQA Process</td>
<td>MND-2</td>
</tr>
<tr>
<td>II. PROJECT DESCRIPTION</td>
<td>MND-3</td>
</tr>
<tr>
<td>A. Introduction</td>
<td>MND-3</td>
</tr>
<tr>
<td>B. Location</td>
<td>MND-3</td>
</tr>
<tr>
<td>C. Setting</td>
<td>MND-4</td>
</tr>
<tr>
<td>D. Background</td>
<td>MND-4</td>
</tr>
<tr>
<td>E. Purpose</td>
<td>MND-10</td>
</tr>
<tr>
<td>F. Proposed Project</td>
<td>MND-10</td>
</tr>
<tr>
<td>G. Project Construction</td>
<td>MND-13</td>
</tr>
<tr>
<td>Best Management Practices (BMPs)</td>
<td>MND-14</td>
</tr>
<tr>
<td>H. Operation and Maintenance</td>
<td>MND-15</td>
</tr>
<tr>
<td>I. Project Actions and Approvals</td>
<td>MND-15</td>
</tr>
<tr>
<td>III. EXISTING ENVIRONMENT</td>
<td>MND-17</td>
</tr>
<tr>
<td>IV. ENVIRONMENTAL EFFECTS/INITIAL STUDY CHECKLIST</td>
<td>MND-17</td>
</tr>
<tr>
<td>V. MITIGATION MEASURES</td>
<td>MND-103</td>
</tr>
<tr>
<td>VI. PREPARATION AND CONSULTATION</td>
<td>MND-107</td>
</tr>
<tr>
<td>A. Preparers</td>
<td>MND-107</td>
</tr>
<tr>
<td>B. Coordination and Consultation</td>
<td>MND-108</td>
</tr>
<tr>
<td>VII. DETERMINATION - RECOMMENDED ENVIRONMENTAL DOCUMENTATION</td>
<td>MND-109</td>
</tr>
<tr>
<td>A. Summary</td>
<td>MND-109</td>
</tr>
<tr>
<td>B. Recommended Environmental Documentation</td>
<td>MND-109</td>
</tr>
<tr>
<td>VIII. REFERENCES</td>
<td>MND-110</td>
</tr>
</tbody>
</table>
LIST OF FIGURES

<table>
<thead>
<tr>
<th>Figure</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Figure 1</td>
<td>Regional Map</td>
</tr>
<tr>
<td>Figure 2</td>
<td>Project Location Map</td>
</tr>
<tr>
<td>Figure 3</td>
<td>Project Vicinity Map</td>
</tr>
<tr>
<td>Figure 4</td>
<td>Project Area</td>
</tr>
<tr>
<td>Figure 5</td>
<td>Bird’s-Eye View of Project Vicinity</td>
</tr>
<tr>
<td>Figure 6</td>
<td>Site Plan</td>
</tr>
<tr>
<td>Figure 7</td>
<td>Historical Resources in Project Area</td>
</tr>
</tbody>
</table>

LIST OF TABLES

<table>
<thead>
<tr>
<th>Table</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table RTC-1</td>
<td>List of Written Comment Letters Received in Response to the Draft IS/MND</td>
</tr>
<tr>
<td>Table 1</td>
<td>Required Permits and Approvals</td>
</tr>
<tr>
<td>Table 2</td>
<td>Estimated Daily Construction Emissions</td>
</tr>
<tr>
<td>Table 3</td>
<td>Estimated Daily Operational Emissions</td>
</tr>
<tr>
<td>Table 4</td>
<td>Estimated Annual Greenhouse Gas Emissions</td>
</tr>
<tr>
<td>Table 5</td>
<td>Noise Level Ranges Of Typical Construction Equipment</td>
</tr>
<tr>
<td>Table 6</td>
<td>Typical Outdoor Construction Noise Levels</td>
</tr>
<tr>
<td>Table 7</td>
<td>Typical Outdoor Construction Vibration Levels</td>
</tr>
<tr>
<td>Table 8</td>
<td>Estimated Mobile Source Noise Levels</td>
</tr>
<tr>
<td>Table 9</td>
<td>Change In Mobile Source Noise Levels</td>
</tr>
<tr>
<td>Table 10</td>
<td>Existing Peak Hour Intersection LOS</td>
</tr>
<tr>
<td>Table 11</td>
<td>Future without Project Peak Hour Intersection LOS</td>
</tr>
<tr>
<td>Table 12</td>
<td>Significant Traffic Impact Thresholds for Signalized Intersections</td>
</tr>
<tr>
<td>Table 13</td>
<td>Construction Trip Generation</td>
</tr>
<tr>
<td>Table 14</td>
<td>Future with Project Construction Peak Hour Intersection LOS</td>
</tr>
<tr>
<td>Table 15</td>
<td>Project Operation Trip Generation</td>
</tr>
<tr>
<td>Table 16</td>
<td>Existing with Project Operation Peak Hour Intersection LOS</td>
</tr>
<tr>
<td>Table 17</td>
<td>Future with Project Operation Peak Hour Intersection LOS</td>
</tr>
</tbody>
</table>
APPENDICES

Appendix A  Air Quality and Greenhouse Gas Analysis Technical Memorandum
Appendix B  Biological Resource Search Results
Appendix C  Cultural and Paleontological Resources Assessments
Appendix D  Geotechnical Investigation Report and Final Compaction Report
Appendix E  Noise and Vibration Impact Study
Appendix F  Traffic Study
Page intentionally left blank.
The following clarifications and modifications are intended to update the Draft IS/MND in response to the comments received during the public review period. These changes constitute the Final IS/MND, to be presented to the City of Los Angeles Board of Recreation and Park Commissioners for adoption. None of the changes to the IS/MND would require recirculation of the document. Revisions made to the IS/MND have not resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the IS/MND is not warranted.

The changes to the IS/MND are listed by section, page number, and paragraph number if applicable. Text which has been removed is shown with a strikethrough line, while text that has been added is shown as underlined. All the changes described in this section have also been made in the corresponding Final IS/MND sections.

**Final IS/MND Clarification/Revision**

<table>
<thead>
<tr>
<th>Page</th>
<th>Clarification/Revision</th>
</tr>
</thead>
</table>
| MND-3 | **An editorial change has been made to the first paragraph on this page to update the website at which the agenda for the Board of Recreation and Park Commissioners can be obtained, as well as the website on which the Final IS/MND will be posted. The websites are updated as follows:**

Public notification of agenda items for the Board of Recreation and Park Commissioners is posted 72 hours prior to the public meeting. The agenda for the Board of Recreation and Park Commissioners can be obtained via the internet at: [http://laparks.org/commissioners/agendas-minutes-reports/2018](http://laparks.org/commissioners/agendas-minutes-reports/2018)  [https://www.laparks.org/commissioners/agendas-minutes-reports/2019](https://www.laparks.org/commissioners/agendas-minutes-reports/2019). However, the official electronic website posting location for the agendas for the meetings of the Board of Recreation and Park Commissioners and its Task Forces is at [www.lacity.org](http://www.lacity.org). The Final IS/MND will be posted on the BOE website at [http://eng.lacity.org/techdocs/emg/projects.htm](http://eng.lacity.org/techdocs/emg/projects.htm) least 10 days prior to the public hearing. |
| MND-11 | **A clarification has been made to the parking requirements for the proposed Project. The last paragraph on this page is clarified as follows:**

No parking spaces are currently provided at the Project site. Parking spaces are also not included with the proposed Project. According to the Los Angeles Municipal Code, 21 parking spaces would be required for the restaurant uses proposed. As such, a parking variance would be required and will be obtained to implement the proposed Project. Due to authority granted to RAP by the Los Angeles City Charter (Charter) Section 591,
RAP is exempt from the regulations of Chapter I of the Los Angeles Municipal Code (LAMC). Numerous transit lines, including Metro Rail Red/Purple Line subway service, and Metro, Foothill Transit, and other bus lines provide access to the site. Existing parking facilities within walking distance and public transportation are readily available in the project area for patrons to utilize. The restaurant operators could lease parking spaces from local parking lots or structures in the area to provide nearby parking for restaurant patrons. The proposed Project would also include bicycle parking areas on-site, to provide additional modes of access to the project area. The proposed Project would be designed in compliance with the Americans with Disabilities Act (ADA).

**MND-17**  
A clarification has been made to the permits and approvals required to implement the proposed Project. Table 1 is modified as follows:

### Table 1  
**Required Permits and Approvals**

<table>
<thead>
<tr>
<th>Agency</th>
<th>Permit/Requirement</th>
<th>Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City of Los Angeles Department of City Planning</td>
<td>Parking Variance</td>
<td>Los Angeles Municipal Code requires 21 parking spaces for the restaurant operations. No parking is proposed as a part of the project.</td>
</tr>
<tr>
<td>City of Los Angeles Department of City Planning</td>
<td>Zoning Designation Change</td>
<td>The current land use is zoned as PF-2D, and will need to be rezoned to OS-2D.</td>
</tr>
<tr>
<td>City of Los Angeles Department of Transportation</td>
<td>Traffic Management Plan</td>
<td>Partial street closures are anticipated during construction.</td>
</tr>
<tr>
<td>City of Los Angeles Department of Building and Safety</td>
<td>ADA compliance review and approval; grading; structure; general permit check (mechanical plumbing; electrical; fire life safety; green building)</td>
<td>Site access and building plans require approval for ADA compliance.</td>
</tr>
<tr>
<td>City of Los Angeles Bureau of Street Services – Urban Forestry Division</td>
<td>Street tree removal permit</td>
<td>Removal and replacement of one street tree in public parkway.</td>
</tr>
<tr>
<td>City of Los Angeles Bureau of Engineering</td>
<td>Review and approval</td>
<td>Improvements proposed within the public right-of-way adjacent to the Project site.</td>
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<tr>
<td>City of Los Angeles Bureau of Sanitation</td>
<td>Review and approval</td>
<td>Low Impact Design related to stormwater management design.</td>
</tr>
<tr>
<td>City of Los Angeles Department of Recreation and Parks</td>
<td>Review and approval</td>
<td>Final adoption of Initial Study and Mitigated Negative Declaration</td>
</tr>
<tr>
<td>Los Angeles Fire Department</td>
<td>Review and approval</td>
<td>Restaurant building requires fire department review and approval.</td>
</tr>
<tr>
<td>City of Los Angeles, Bureau of Sanitation</td>
<td>Industrial Wastewater Permit Application for Food Service Establishment review and approval</td>
<td>Restaurant building requires wastewater permit.</td>
</tr>
</tbody>
</table>
Table 1
Required Permits and Approvals

<table>
<thead>
<tr>
<th>Agency</th>
<th>Permit/Requirement</th>
<th>Issue</th>
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<tbody>
<tr>
<td>Los Angeles Regional Water Quality Control Board</td>
<td>National Pollution Discharge Elimination System (NPDES) Permit for Construction</td>
<td>Water quality and placement to discharges associated with dewatering activities.</td>
</tr>
</tbody>
</table>

MND-43  An editorial change has been made to the discussion of construction activities in Section 5(b). The section paragraph on this page is modified as follows:

A significant impact would occur if the project caused a substantial adverse change in the significance of an archaeological resource, as defined in California Code of Regulations Section 15064.5. Construction activities would include hazardous materials abatement, rough grading, utility installations, landscaping and hardscaping, construction of buildings, and installation of other park structures. The project may have direct impacts on subsurface archaeological resources that may be encountered during construction. Disturbance of archaeological resources would result in a significant impact under CEQA.

MND-62  An editorial change has been made to the discussion of groundwater in Section 9(b). The third paragraph on this page is modified as follows:

Construction of the proposed Project would excavate to approximately 12 feet deep for foundations and footings when foundation piles are installed within the indoor pool and indoor gymnasium footprints. However, construction activity that has the potential to encounter groundwater would be required to comply with the recommendations set forth in the Geotechnical Engineering Report, such as proper disposal of displaced groundwater and dewatering during construction of the pool. Implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts related to groundwater during construction to less than significant.

MND-63  An editorial change has been made to Section 9(d). The first sentence in the second paragraph in this section is modified as follows:

As discussed in Section 9(a), the proposed Project would not result in a substantial increase of impervious surfaces at the Project site as facilities within the park are to be demolished and constructed elsewhere on the site.
MND-67  A clarification has been made to the discussion of zoning at the site in Section 10(b). The second paragraph on this page is modified as follows:

The Project site is located entirely within the City of Los Angeles in the Central City Community Plan Area. The Central City Community Plan establishes the goals, objectives, policies, and programs applicable to the Central City Community Plan Area. The City’s current zoning designation for the Project site is PF-2D (Public Facilities). The Project site would be developed into a public park, and would require re-zoning to OS-2D (Open Space) to reflect the change in land use and changes to zoning will be reflected through the City’s Community Plan update process, which will adjust the zoning at the site to OS for Open Space uses. Thus, the proposed Project will be consistent with the zoning for the site. Additionally, the park would continue to be operated under RAP jurisdiction, with a qualified business holding a contract with RAP for the restaurant food and beverage concessions within the site. Therefore, the proposed Project would not conflict with the existing zoning or General Plan designations for the Project site. No impact would occur.

MND-68  A clarification has been made to the parking requirements for the proposed Project. The first paragraph on this page is clarified as follows:

Los Angeles Municipal Code requires that 21 parking spaces be constructed for the proposed restaurant; therefore, a parking variance would be required for the Project. Due to authority granted to RAP by the Los Angeles City Charter (Charter) Section 591, RAP projects are exempt from the regulation of Chapter I of the Los Angeles Municipal Code (LAMC). Existing parking and public transportation facilities, including the Metro Rail Red/Purple Line subway service, Metro bus, Foothill Transit, and other bus lines are located within walking distance and would be available to park and restaurant patrons. Additionally, nearby parking could and would be leased by the restaurant operators specifically to accommodate parking needs for restaurant patrons. As detailed in the Traffic Study (Appendix F), the proposed Project would not significantly impact area parking supplies. Adequate parking would remain available at the Olive Street & 1st Street Parking Lot and the Judge John Aiso Street & 1st Street Parking Structure. No impacts would result.

MND-99  A clarification has been made to the solid waste generated during construction activities in Section 18(f). The discussion on this page is clarified as follows:

Construction of the proposed Project would generate demolition construction debris during excavation and grading activities removal of the remaining surface and subsurface structures. Uncontaminated soil may be
excavated, stockpiled, redistributed, and reused. Soils that require remediation may be excavated, stabilized, and potentially hauled from the site to a certified disposal facility.

The construction and demolition debris would be recycled whenever possible, or disposed of at an appropriate facility. As demonstrated above and according to the CalRecycle’s SWIS database, there is sufficient inert waste disposal capacity available in Los Angeles County to adequately accommodate the anticipated demolition debris. Further, certain landfills accept wastes considered to be beneficial-use materials, such as soil, green waste, and asphalt. Several landfills in the greater Los Angeles area accept excavated soil, including those that otherwise are restricted by ordinances from accepting municipal solid waste generated in the City of Los Angeles. When possible, the waste would be transferred to local yards to minimize traffic disruption as well as the possibility of general spills.
A. Introduction

The 1st and Broadway Civic Center Park Project Draft IS/MND was circulated for public review and comment by the City of Los Angeles on January 3, 2019, initiating a 30-day public review period pursuant to CEQA and its implementing guidelines. The Notice of Intent/Notice of Availability was also distributed to 22 relevant agencies and organizations, as well as 34 property owners and occupants. Additionally, the IS/MND was available for review at the Little Tokyo Branch Library, Chinatown Branch Library, Los Angeles Central Library, Council District 14 Office, and the BOE headquarters. The IS/MND was also available online at the BOE website.

During this public review period, three (3) comment letters were received, as shown in Table 18 below. Each comment letter has been assigned a number code, and individual comments in each letter have been coded to facilitate responses. For example, the letter from the California Department of Toxic Substances Control is identified as Letter 1, with comments noted as 1-1, 1-2, 1-3, etc. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

B. Responses to Written Comments That Address Environmental Issues in the Draft Initial Study/Mitigated Negative Declaration

The written comment letters received on the Draft IS/MND are listed in Table RTC-1 below. The comments and associated responses are arranged by the date of receipt of the comment letter or email. The individual comments in the letters have been numbered and are referred to in the responses that directly follow the comment letter.

<table>
<thead>
<tr>
<th>Letter #</th>
<th>Agency/Organization/Individual</th>
<th>Date</th>
<th>Page # of Response</th>
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<td>1</td>
<td>California Department of Toxic</td>
<td>January 18, 2019</td>
<td>RTC-4</td>
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<tr>
<td></td>
<td>Substances Control Signed: Pete</td>
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<td></td>
<td>Cooke</td>
<td></td>
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<td>2</td>
<td>California Department of</td>
<td>January 29, 2019</td>
<td>RTC-7</td>
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<td>Transportation Signed: Miya</td>
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<td></td>
<td>Edmonson</td>
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<tr>
<td>3</td>
<td>California Governor’s Office</td>
<td>February 4, 2019</td>
<td>RTC-12</td>
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<tr>
<td></td>
<td>of Planning and Research,</td>
<td></td>
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<td></td>
<td>State Clearinghouse Signed:</td>
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<tr>
<td></td>
<td>Scott Morgan</td>
<td></td>
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</tbody>
</table>
January 18, 2019

Talmage Jordan  
Bureau of Engineering  
1149 S Broadway, Suite 600, Mail Stop 939  
Los Angeles, California 90015

NOTICE OF PREPARATION OF A MITIGATED NEGATIVE DECLARATION FOR THE  
1ST & BROADWAY CIVIC CENTER PARK PROJECT (PROJECT)

Dear Mr. Jordan:

The Department of Toxic Substances Control (DTSC) has received your document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.
Talmage Jordan  
January 18, 2019  
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC’s web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-8555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

[Signature]

Pete Cooke  
Site Mitigation and Restoration Program - Chatsworth Office

cc:  
Governor’s Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Dave Kereazis  
Hazardous Waste Management Program, Permitting Division  
CEQA Tracking  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806
Letter 1: California Department of Toxic Substances Control

Response 1-1
The commenter states that the document needs to identify whether existing or previous land uses have resulted in a release of hazardous substances as well as identify any known or potentially contaminated sites in the project area. Previous remediation activities at the project site are discussed in Section 8 (a) on page 55 of the IS/MND, which states:

“The project area formerly contained a 13-story California State Office Building with landscaping around the building’s footprint, a basement containing building operational equipment, and a sub-basement used for parking. The above-ground portions of the building were demolished in 1976 after enduring unsafe levels of damage during the San Fernando (Sylmar) earthquake in 1971. The remaining site underwent a project to remove all remaining components, and grade the site for open space uses in 2013. Trash and debris, lead-based paint, non-hazardous waste water, mold, and asbestos removal were undertaken as a part of the remediation process prior to demolition. The completed project no longer contained known environmental hazards, and has been maintained as an empty dirt lot since 2013.”

Additionally, known hazardous materials sites in the project area are discussed in Section 8 (d) on page 58 of the IS/MND, which states:

“A significant impact would occur if the proposed Project were located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, created a significant hazard to the public or the environment.

The Project site is not listed in the State Water Resources Control Board (SWRCB) GeoTracker system which includes leaking underground fuel tank sites and spills, leaks, investigations, and cleanups sites; or the Department of Toxic Substances Control EnviroStor Data Management System which includes CORTESE sites, or the Environmental Protection Agency’s database of regulated facilities. Although no hazardous materials sites exist on the Project site, two permitted hazardous materials sites exist 0.09 miles southwest of the Project site, however, required site activity has been limited to compliance site inspections.”

As discussed in Sections 8 (a) and 8 (d), known hazardous materials were removed from the previous land use in 2013, and the project site is not listed on any hazardous materials sites. Additionally, the IS/MND identifies that there are two listed sites in proximity to the Project site that require site inspections. Thus, the IS/MND identifies whether historic and existing uses at the Project site have resulted in the release of hazardous substances, and states that, since the remediation activities in 2013, no
known environmental hazards have been present at the Project site. The IS/MND also identifies the known hazardous waste sites in the Project area.

**Response 1-2**
The commenter states that the document should identify the mechanism to initiate remediation activities and identify the agencies that would be involved with regulatory oversight should these activities be necessary. Additionally, the commenter states that the document should identify how remediation would occur should contaminated soil be discovered.

The commenter is referred to Section 8 (d) on page 58 of the IS/MND, which discusses the measures that would be taken should contaminated soils be identified during construction. As stated on page 58, “while unlikely, should contaminated soils be encountered during construction of the proposed Project, excavated material (e.g., soil, slurry, and groundwater) would be monitored and tested prior to disposal. Excavated material that is deemed hazardous would be subject to strict federal, state, and local regulations for its handling, transport, and disposal. These activities would occur under the oversight of the California Department of Toxic Substances Control, SWRCB, and the Los Angeles Fire Department. Adherence to federal, state, and local standards would minimize the risk to the public or the environment.” The IS/MND concludes that, with adherence to these existing regulations, the impact would be less than significant.

**Response 1-3**
The commenter discusses where more information on Preliminary Endangerment Assessment preparation and the Voluntary Cleanup Program can be found. No response to this comment is required.
January 29, 2019

Talmage Maxwell Jordan
Bureau of Engineering
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015

RE: 1st and Broadway Civic Center Park Project
Mitigated Negative Declaration (MND)
SCH# 2019011002
GTS # 07-LA-2019-02142
Vic. LA / 101 / 1.091

Mr. Jordan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this MND. The City of Los Angeles (City) Department of Recreation and Parks (RAP) and City of Los Angeles Department of Public Works, Bureau of Engineering (BOE) are proposing to develop the 1st and Broadway Civic Center Park Project (proposed Project), located at 126 N. Broadway, Los Angeles, California 90012. The proposed Project is sometimes referred to as “FAB” or “FAB Park.” The project will build a 1.96-acre park, featuring both landscaped and hardscaped areas to accommodate a wide variety of park activities, programs, and events, at the northeast corner of West 1st Street and Broadway in downtown Los Angeles. The proposed Project also includes a 19,200 square foot, two-story building that will house a café and beer garden on the ground floor, a full-service destination restaurant on the second floor, and a viewing deck and bar lounge on the roof terrace.

The nearest State facility to the proposed project is State Route 101. After reviewing the Initial Study / Mitigated Negative Declaration (IS/MND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

We look forward to reviewing this project’s future environmental documents and will provide additional comments at that time, if warranted. If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2019-02142

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”
Letter 2: California Department of Transportation

Response 2-1
This comment correctly characterizes the proposed Project in the IS/MND. Therefore, no further response to this comment is provided.

Response 2-2
The commenter states that the nearest State facility to the proposed Project is State Route 101, and that project approval is not expected to result in a direct adverse impact at this facility. This comment does not raise issues regarding the adequacy of the analysis in the IS/MND. No further response to this comment is required.

Response 2-3
The commenter states that transportation of heavy construction equipment and/or other materials requiring the use of oversized vehicles on State highways would require a transportation permit. The proposed Project would be required to comply with all applicable California Department of Transportation regulations during construction. Additionally, to the extent practicable, large size truck trips would be limited to off-peak commute periods.

Response 2-4
The commenter states that they would like to review any future environmental documents associated with the proposed Project. The California Department of Transportation is already included in the Project mailing list and will be notified of the availability of the Final IS/MND and related documents, as well as future project hearings, as requested.
Comment Letter No. 3

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

February 4, 2019

Talmage Jordan
City of Los Angeles
1149 S Broadway, Suite 600, MS 939
Los Angeles, CA 90015

Subject: 1st and Broadway Civic Center Park Project
SCH#: 2019011002

Dear Talmage Jordan:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 1, 2019, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL. 1-916-415-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov
**Lead Agency Contact**

- **Name**: Talmage Jordan
- **Agency**: City of Los Angeles
- **Phone**: (213) 485-5754
- **Fax**:
- **Address**: 1149 S Broadway, Suite 600, MS 939
- **City**: Los Angeles
- **State**: CA
- **Zip**: 90015

**Project Location**

- **County**: Los Angeles
- **City**:
- **Region**:
- **Lat / Long**:
- **Cross Streets**: 1st St and Broadway
- **Parcel No.**: 5161-005-925

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<th>Township</th>
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**Proximity to:**

- **Highways**: 110, 2, 60
- **Airports**:
- **Railways**: Red Line, Metro/Amtrak
- **Waterways**: LA River
- **Schools**: Pacific Charter School
- **Land Use**: PF-2D zone; PF LU

**Project Issues**

- Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

**Reviewing Agencies**

- Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; California Highway Patrol; Department of Water Resources; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received**: 01/03/2019  
**Start of Review**: 01/03/2019  
**End of Review**: 02/01/2019

**Note**: Blanks in data fields result from insufficient information provided by lead agency.
January 18, 2019

Talmage Jordan
Bureau of Engineering
1149 S Broadway, Suite 600, Mall Stop 939
Los Angeles, California 90015

NOTICE OF PREPARATION OF A MITIGATED NEGATIVE DECLARATION FOR THE 1ST & BROADWAY CIVIC CENTER PARK PROJECT (PROJECT)

Dear Mr. Jordan:

The Department of Toxic Substances Control (DTSC) has received your document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.
DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC’s web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
    State Clearinghouse
    P.O. Box 3044
    Sacramento, California 95812-3044

    Dave Kereazis
    Hazardous Waste Management Program, Permitting Division
    CEQA Tracking
    Department of Toxic Substances Control
    P.O. Box 806
    Sacramento, California 95812-0806
Letter 3: California Governor’s Office of Planning and Research, State Clearinghouse

Response 3-1
The commenter states that the State Clearinghouse circulated the Draft IS/MND to selected state agencies for review during the public review period and that comments from responding agencies are attached. This comment does not raise issues regarding the adequacy of the analysis in the IS/MND. No further response to this comment is required.

Response 3-2
The commenter acknowledges that the lead agency has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. This comment does not raise issues regarding the adequacy of the analysis in the IS/MND. No further response to this comment is required.

Response 3-3
The Document Details Report from the State Clearinghouse database explaining the distribution of the Draft IS/MND is noted. This comment does not raise issues regarding the adequacy of the analysis in the IS/MND. No further response to this comment is required.

Response 3-4
The comment letter from the California Department of Toxic Substances Control is attached. See Responses 2-1 through 2-4 above for responses to these comments.
CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

Council District: 14  Date: March 2019
Lead City Agency: Department of Public Works, Bureau of Engineering
Project Title: 1st & Broadway Civic Center Park Project

I. INTRODUCTION

A. Purpose of an Initial Study

The California Environmental Quality Act (CEQA) was enacted in 1970 for the purpose of providing decision-makers and the public with information regarding environmental effects of proposed Projects; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project’s approval even if it leads to environmental damage. The Bureau of Engineering Environmental Management Group has determined that the proposed Project is subject to CEQA and no exemptions apply. Therefore, the preparation of an Initial Study (IS) is required.

An IS is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the IS concludes that the project, with incorporation of mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the lead agency may adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

The IS/MND contained herein has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended July 31, 2002).
B. Document Format

This IS/MND is organized into eight sections as follows:

Section I, Introduction: provides an overview of the project and the CEQA environmental documentation process.

Section II, Project Description: provides a description of the project location, project background, project components, and proposed construction and operation.

Section III, Existing Environment: provides a description of the existing environmental setting with focus on features of the environment that could potentially affect the proposed Project or be affected by the proposed Project.

Section IV, Environmental Effects/Initial Study Checklist: presents the City of Los Angeles’ Checklist for all impact areas and mandatory findings of significance. This Section includes a discussion of the environmental effects and identifies applicable mitigation measures.

Section V, Mitigation Measures: provides the mitigation measures that would be implemented to ensure that potential adverse impacts of the proposed Project would be reduced to a less than significant level.

Section VI, Preparation and Consultation: provides a list of key personnel involved in the preparation of this report and key personnel consulted.

Section VII, Determination – Recommended Environmental Documentation: provides the recommended environmental documentation for the proposed Project.

Section VIII, References: provides a list of reference materials used during the preparation of this report.

C. CEQA Process

The proposal to adopt a ND (or MND) initiates a 20-day public comment period, 30 days if a State Agency is involved. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the IS and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed Project. If a reviewer believes there is substantial evidence that the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.

Prior to making a determination, the decision-making body (for this proposed Project, it is the Board of Recreation and Park Commissioners) must consider the IS together with any comments received during the public comment review process. The decision-making body would adopt the IS only if it finds, on the basis of the whole record before it, that
there is no substantial evidence that the project would have a significant effect on the environment and that the study reflects the lead agency’s independent judgment and analysis.

Public notification of agenda items for the Board of Recreation and Park Commissioners is posted 72 hours prior to the public meeting. The agenda for the Board of Recreation and Park Commissioners can be obtained via the internet at: http://laparks.org/commissioners/agendas-minutes-reports/2018. However, the official electronic website posting location for the agendas for the meetings of the Board of Recreation and Park Commissioners and its Task Forces is at www.lacity.org.

If the project is approved, the City would file a Notice of Determination (NOD) with the County Clerk within 5 days. The NOD would be posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues which were presented to the lead agency either orally or in writing, during the public comment period.

As a covered entity under Title II of the Americans with Disabilities Act (ADA), the City of Los Angeles does not discriminate on the basis of disability and, upon request, would provide reasonable accommodation to ensure equal access to its programs, services, and activities.

II. PROJECT DESCRIPTION

A. Introduction

The City of Los Angeles (City) Department of Recreation and Parks (RAP) and City of Los Angeles Department of Public Works, Bureau of Engineering (BOE) are proposing to develop 1st and Broadway Civic Center Park Project (proposed Project), located at 126 N. Broadway, Los Angeles, California 90012. The proposed Project is sometimes referred to as “FAB” or “FAB Park.” The project will build a 1.96-acre park, featuring both landscaped and hardscaped areas to accommodate a wide variety of park activities, programs, and events, at the northeast corner of West 1st Street and Broadway in downtown Los Angeles. The proposed Project also includes a 19,200 square feet, two-story building that will house a café and beer garden on the ground floor, a full-service destination restaurant on the second floor, and a viewing deck and bar lounge on the roof terrace.

B. Location

The Project site is located at 126 N. Broadway, Los Angeles, CA 90012, in the Civic Center area of downtown Los Angeles and is identified as Assessor Parcel Number (APN) 5161-005-925. The Project site is generally bound by Los Angeles County’s Grand Park adjacent on the north, Spring Street on the east, 1st Street on the south, and Broadway on the west. Major arterials providing access to the Project site include both 1st Street and Broadway, located adjacent south and west the Project site, respectively. In addition, East Temple Street is located approximately one block to the north, and South
Grand Avenue is located approximately two blocks to the west of the Project site. Regional access to the Project site is provided by State Route 110 (SR 110, Harbor Freeway) located approximately 0.58 miles west/northwest of the Project site; Interstate 5 (I-5, Golden State Freeway) located approximately 1.7 miles east of the Project site; U.S. Highway 101 (US 101, Santa Ana Freeway) located approximately 0.22 miles north and approximately 0.40 miles east of the Project site, respectively; and Interstate 10 (I-10, Santa Monica Freeway) located approximately 1.8 miles south of the Project site. Figure 1 shows the regional vicinity of the Project site and Figure 2 shows the project location.

All previous structures located on the Project site were demolished in 2013, and hazardous materials abatement was completed leaving the site prepared for future potential construction. The Project site is currently a vacant dirt lot that is fenced in to restrict access. There are no trees or vegetation located on the site; however, several existing trees surround the Project site from within Grand Park and within the City sidewalk right-of-way. The Project site includes a temporary surface parking lot used for occasional special events, but no permanent use was designated at the location before the currently proposed Project was developed. Figure 3 shows the existing uses in the project area, Figure 4 shows the existing Project site, and Figure 5 shows a bird’s-eye view of the project area.

C. Setting

The area immediately surrounding the Project site is completely urbanized and developed with Grand Park and a Los Angeles County courthouse to the north, the Los Angeles City Hall and City Hall Park to the east, the Los Angeles Police Department Headquarters to the southeast, office buildings and the Times Mirror building (formerly the Los Angeles Times building) to the south, the Los Angeles Federal Courthouse to the southwest, and the Los Angeles Law Library to the west.

The Project site and area is accessible by numerous public transportation lines, including light rail transit lines and bus lines. The Los Angeles County Metropolitan Transportation Authority (Metro) Red Line/Purple Line Civic Center/Grand Park light rail subway station is located approximately one block west of the Project site. In addition, several Metro and municipal bus lines travel along 1st Street and Broadway in the project area. Several Metro, Los Angeles Department of Transportation (LADOT) DASH, and Foothill Transit bus stops are located directly adjacent to the Project site.

D. Background

The Project site formerly contained a 13-story California State Office Building with landscaping around the building’s footprint, a basement containing building operational equipment, and a sub-basement used for parking. The above-ground portions of the building were demolished in 1976 after enduring unsafe levels of damage during the San Fernando (Sylmar) earthquake in 1971. Since the early 1970s, the Project site has been in a dilapidated state, becoming a potential hazard to the public. In 2013, the City of Los Angeles acquired the Project site from the State of California, with the intent to seek development opportunities that would reduce blight, and increase the health and safety of
Figure 5
Bird’s-Eye View of Project Vicinity

Source: OMA, February 2018.

NOT TO SCALE
the site. The acquisition process included site demolition, and hazardous materials remediation and abatement activities. The Project site is currently a vacant dirt lot that is used as a temporary parking area during occasional special events.

The intent of the proposed Project is to create a world-class iconic park at the center of Los Angeles' Civic Center area. The City recognizes that the future success of the proposed Project depends on the involvement of the public. A project design competition was initiated for the Project site in 2015. As part of this process, the City engaged in comprehensive community outreach efforts to make known all available opportunities for public participation. These efforts included providing public viewing opportunities for all design competition entries at several locations in downtown Los Angeles, holding public meetings to obtain input on project design and to update the community on the design competition and project, meetings with and outreach to various stakeholders and community associations, as well as other outreach activities. The preferred design was then selected, and a total of approximately 10 community and/or stakeholder outreach meetings were held related to the project design.

E. Purpose

The primary objectives of the proposed Project are to:

- Transform the vacant lot to a park which will provide a much needed open space for the community to enjoy;
- Provide additional dining options for the park users and surrounding patrons; and
- Create a world-class iconic park at the center of Los Angeles' Civic Center area.

F. Proposed Project

The proposed Project would include the development of a 1.96-acre vacant lot into an open space public park located in the Civic Center area of downtown Los Angeles, which is the result of a design competition previously initiated by the City. The proposed Project would incorporate a two-story restaurant building complex with rooftop access within the northwest corner of the park; trees and green spaces for public enjoyment, numerous seating areas, 16 decorative canopies to provide shade and lighting throughout the park, public art features, new hardscaping and landscaped areas, and bioswales or other treatment best management practices (BMPs).

The proposed approximately 19,200-square-foot restaurant building complex would include space for concessionaires to operate all concepts in the facility. The new building would include a rooftop patio and bar, an upscale restaurant, an approximately 1,380-square-foot café with a food service window to serve outdoor patrons, and an approximately 1,500-square-foot outdoor beer garden attached to the two-story structure. A portion of the ground level floor of the restaurant building would be externally shaped into a tiered sitting area with a capacity to seat up to 60 park patrons at a time, and would be shaded by cantilevering above. Rooftop access would be available with an approximately 450-square-foot bar, an approximately 1,330-square-foot dining and
lounge area for restaurant patrons, and an approximately 1,260-square-foot public space. A loading zone would be provided on the north side of the building and Project site for use in routine restaurant operations. Public restrooms would be provided on the first floor of the restaurant building and at the rooftop. Figure 6 shows the proposed Project site plan.

The proposed Project would remove one magnolia tree from the public sidewalk adjacent to the Project site along Broadway. The removed tree would be replaced with the proposed Project along Spring Street.

During construction of the project, BMPs would be implemented in order to prevent any contamination from water runoff entering into storm drains. Specifically, the contractor will implement a storm water pollution plan (SWPPP) which is mandated by the State of California and the City of Los Angeles to prevent contaminant from escaping the construction site. The proposed Project would include a bioswale system that would allow water infiltration into the ground.

The proposed Project would include a bicycle parking area, outdoor seating areas, planting of a variety of plants and trees for public enjoyment, walking pathways and passive recreational uses, and new lighting.

Programming for the proposed Project would potentially include art exhibit events, concessionaire-sponsored events, and RAP-sponsored events. Approximately 4 or 5 art exhibit events and up to 40 concessionaire-sponsored events would occur annually. Ten concessionaire-sponsored events are anticipated for each of the 4 restaurant spaces in the new building. These events may include corporate events, fundraisers, and weddings. In addition, approximately 12 RAP-sponsored events are anticipated to be held annually, which include events organized by City representatives or officials. Other events to be held at the proposed Project would be identified by the City at a later date.

As previously mentioned, the Project site is located adjacent to the existing Grand Park, which is owned by the County of Los Angeles, and would operate separately. RAP would operate and maintain the proposed Project.

No parking spaces are currently provided at the Project site. Parking spaces are also not included with the proposed Project. According to the Los Angeles Municipal Code, 21 parking spaces would be required for the restaurant uses proposed. As such, a parking variance would be required and will be obtained to implement the proposed Project. Existing parking facilities within walking distance and public transportation are readily available in the project area for patrons to utilize. The restaurant operators could lease parking spaces from local parking lots or structures in the area to provide nearby parking for restaurant patrons. The proposed Project would also include bicycle parking areas on-site, to provide additional modes of access to the project area. The proposed Project would be designed in compliance with the Americans with Disabilities Act (ADA).
The hours of operation for the restaurant building complex would be 7:00 a.m. to 12:00 a.m. on Monday through Thursday, and 8:00 a.m. to 1:00 a.m. on Friday through Sunday. The park’s hours of operation would be 5:30 a.m. to 10:30 p.m., in accordance with Los Angeles Municipal Code Section 63.44 and associated ordinances.

G. Project Construction

The construction of the proposed Project would last for approximately two years from Summer/Fall 2019 to Summer/Fall 2021. Construction would occur over four phases including mobilization, grading, building construction, and installation of hardscape and landscape components.

Phase 1 would occur for approximately 2 weeks and would include all mobilization efforts necessary to begin project construction. This includes obtaining any necessary permits, permissions, and entitlements necessary for park construction; as well as performing any necessary pre-construction surveys.

Phase 2 would occur for approximately 2 months and would include site grading activities and excavation work with a maximum depth of 12 feet. Excavation would be required for the area where foundations and footings would be located. An estimated 1,500 cubic yards of soil would be excavated. Construction workers would operate a bulldozer, hydraulic excavator, compactors, and up to five dump trucks or more per day as a part of the grading activities. As previously mentioned, the Project site was previously graded as part of the abatement and remediation activities during the removal of the prior State building. As such, grading activities under the proposed Project construction would be limited to areas necessary for landscape, hardscape and restaurant construction.

Phase 3 would occur for approximately 14 months and would include restaurant building construction and associated components. Construction workers would operate a crane and 2 forklifts during this phase. It is anticipated that the completion of Phase 3 would overlap for approximately 5 months with the completion of Phase 4 described below.

Phase 4 would occur for approximately 10 months and would include the installation of the hardscape and landscape components, including the 16 decorative lighted canopies that would exist throughout the park, as well as associated utilities work and a creek that serves as a bioswale system.

The construction lay down area would be entirely on-site, and would be coordinated with any other construction activities occurring in the project area to reduce the potential for cumulative construction effects in this heavily visited area of downtown Los Angeles. In addition, construction of the proposed Project would be coordinated with the adjacent Grand Park as needed. One existing bus shelter, located on 1st Street near Spring Street, would be replaced in kind.

Construction activities would occur Monday through Friday between 7:00 a.m. and 4:00 p.m. Partial street closures would be expected for two to three weeks during construction, with vehicular and pedestrian detours not anticipated. Approximately 20 to 30 construction workers would be expected to be onsite during construction hours.
Unless otherwise stated, the proposed Project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- Los Angeles Municipal Code
- Bureau of Engineering Standard Plans
- Standard Specifications for Public Works Construction
- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction

**Best Management Practices (BMPs)**

An appropriate combination of monitoring and resource avoidance would be employed during all construction activities, including implementation of the following Best Management Practices (BMPs):

- Construction of the proposed Project is anticipated to occur Monday through Friday from 7:00 a.m. to 4:00 p.m. Should construction be required outside of the anticipated hours, construction activity would comply with the allowable hours of construction as dictated in the Los Angeles Municipal Code Section 41.40, including 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction activity on Sundays or City holidays.

- The proposed Project would implement Rule 403 fugitive dust control measures required by the South Coast Air Quality Management District (SCAQMD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to, the following:
  - Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
  - Maintenance of roadways in a clean condition

- The proposed Project would implement erosion control where necessary that may include, but would not be limited to, the following:
  - Minimizing the extent of disturbed areas and duration of exposure;
  - Stabilizing and protecting disturbed areas;
  - Keeping runoff velocities low;
  - Retaining sediment within the construction area;
  - Use of silt fences or straw wattles;
  - Temporary soil stabilization;
  - Temporary drainage inlet protection;
  - Temporary water diversion around the immediate work area; and
  - Minimizing debris from construction vehicles on roads providing construction access
The proposed Project would implement Rule 402 measures required by the SCAQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.

- BOE would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire.
- Spill kits will be available onsite for potential leaks or spills of hazardous materials.
- BOE or its contractor would minimize short-term construction noise through: (1) proper maintenance and tuning of all construction equipment engines to minimize noise emissions; and (2) proper maintenance and functioning of the mufflers on all internal combustion and equipment engines.

The proposed Project construction would incorporate source reduction techniques and recycling measures and maintain a recycling program to divert waste in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance.

H. Operation and Maintenance

Operation and maintenance of the proposed Project would be the responsibility of RAP, under existing park operation and maintenance requirements within the City. Specific programs, events, and site operators would be developed, evaluated and selected by RAP under separate planning processes.

I. Project Actions and Approvals

Numerous approvals and/or permits would be required to implement the proposed Project. The environmental documentation for the project would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include, but may not be limited to, the following as listed in Table 1:
### Table 1
Required Permits and Approvals

<table>
<thead>
<tr>
<th>Agency</th>
<th>Permit/Requirement</th>
<th>Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City of Los Angeles Department of City Planning</td>
<td>Parking Variance</td>
<td>Los Angeles Municipal Code requires 21 parking spaces for the restaurant operations. No parking is proposed as a part of the project.</td>
</tr>
<tr>
<td>City of Los Angeles Department of City Planning</td>
<td>Zoning Designation Change</td>
<td>The current land use is zoned as PF-2D, and will need to be rezoned to OS-2D.</td>
</tr>
<tr>
<td>City of Los Angeles Department of Transportation</td>
<td>Traffic Management Plan</td>
<td>Partial street closures are anticipated during construction.</td>
</tr>
<tr>
<td>City of Los Angeles Department of Building and Safety</td>
<td>ADA compliance review and approval; grading; structure; general permit check (mechanical plumbing; electrical; fire life safety)</td>
<td>Site access and building plans require approval for ADA compliance.</td>
</tr>
<tr>
<td>City of Los Angeles Bureau of Street Services – Urban Forestry Division</td>
<td>Street tree removal permit</td>
<td>Removal and replacement of one street tree in public parkway.</td>
</tr>
<tr>
<td>City of Los Angeles Bureau of Engineering</td>
<td>Review and approval</td>
<td>Improvements proposed within the public right-of-way adjacent to the Project site.</td>
</tr>
<tr>
<td>City of Los Angeles Bureau of Sanitation</td>
<td>Review and approval</td>
<td>Low Impact Design related to stormwater management design.</td>
</tr>
<tr>
<td>City of Los Angeles Department of Recreation and Parks</td>
<td>Review and approval</td>
<td>Final adoption of Initial Study and Mitigated Negative Declaration</td>
</tr>
<tr>
<td>Los Angeles Fire Department</td>
<td>Review and approval</td>
<td>Restaurant building requires fire department review and approval.</td>
</tr>
<tr>
<td><strong>Regional</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Los Angeles Regional Water Quality Control Board</td>
<td>National Pollution Discharge Elimination System (NPDES) Permit for Construction</td>
<td>Water quality and placement to discharges associated with dewatering activities.</td>
</tr>
</tbody>
</table>

The operators of any events held at the proposed Project would be responsible for complying with all applicable local laws and regulations. Therefore, the operators of the events would also be required to obtain the appropriate permits from the local authorities with jurisdiction over such uses.

The analysis in this document assumes that, unless otherwise stated, the proposed Project would be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards (e.g., *Los Angeles Municipal Code* and Bureau of Engineering *Standard Plans*). Construction would follow the uniform practices established by the Southern California Chapter of the American Public Works Association (e.g., *Standard Specifications for Public Works Construction* and the *Work...*).
Area Traffic Control Handbook) as specifically adopted by the City of Los Angeles (e.g., The City of Los Angeles Department of Public Works Additions and Amendments to the Standard Specifications For Public Works Construction [AKA “The Brown Book,” formerly Standard Plan S-610]).

III. EXISTING ENVIRONMENT

The Project site is currently a vacant lot. The location is fenced, and has on-site temporary lighting to provide security. Site use is currently limited to City-sponsored special events, and for limited use by private renters. All current site use is managed by RAP and Board of Public Works.

The California Department of Conservation, California Geological Survey’s Seismic Hazard Zonation Program Map indicates that the Project site is not within an Alquist-Priolo Earthquake Fault Zone. The nearest fault zone to the Project site is the Lower Elysian Park Thrust located approximately 2.5 miles southwest of the site and no active faults are known to cross the Project site. However, the Project site is located within a designated liquefaction zone. The Project site is not located within a 100-year floodplain, but is located within a 500-year (0.2-percent-annual-chance) floodplain.

IV. ENVIRONMENTAL EFFECTS/INITIAL STUDY CHECKLIST

This section documents the screening process used to identify and focus upon environmental impacts that could result from the proposed Project. The IS Checklist below follows closely the form prepared by the Governor’s Office of Planning and Research and was used in conjunction with the City’s L.A. CEQA Thresholds Guide and other sources to screen and focus upon potential environmental impacts resulting from this project. Impacts are separated into the following categories:

- **No Impact.** This category applies when a project would not create an impact in the specific environmental issue area. A “No Impact” finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is clearly not a risk for projects not near the coast). A finding of “No Impact” is explained where the finding is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

- **Less Than Significant Impact.** This category is identified when the project would result in impacts below the threshold of significance, and would therefore be less than significant impacts.

- **Less Than Significant After Mitigation.** This category applies where the incorporation of mitigation measures would reduce a “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures are described briefly along with a brief explanation of how they would reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be incorporated by reference.
• **Potentially Significant Impact.** This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures could be identified to reduce impacts to a less than significant level. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required. There are no such impacts for the proposed Project.

Sources of information that adequately support these findings are referenced following each question. All sources so referenced are available for review at the offices of the Bureau of Engineering, 1149 South Broadway, Suite 600, Los Angeles, California 90015.

Please contact Talmage Maxwell Jordan at (213) 485-5754 or at Talmage.Jordan@lacity.org for information regarding the environmental document. Please contact Nur Malhis at (213) 485-4737 or at Nur.Malhis@lacity.org for information regarding the proposed Project.
1. AESTHETICS – Would the project:

a) Have a substantial adverse effect on a scenic vista?  ☒

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.2); Central City Community Plan

Comment: A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact would occur if the proposed Project introduced incompatible visual elements within a field of view containing a scenic vista or substantially altered a view of a scenic vista.

Scenic views or vistas are panoramic public views of various natural features, including the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be available from nearby parklands, private and public-owned sites, and public right-of-way.

The Central City Community Plan does not delineate or designate any specific views as protected scenic vistas within the project area. The Plan does state that civic open spaces should be bounded by public streets, provide public art, and provide a sense of place. The Project site is located within an urban setting and is bounded by Grand Park adjacent on the north, Spring Street on the east, 1st Street on the south, and Broadway on the west. The Project site is currently vacant and is the location of the former 13-story California State office building.

The proposed Project would development the 1.96-acre vacant Project site into an open space public park located in the Civic Center area of downtown Los Angeles. The proposed Project would construct a two-story restaurant building complex with a rooftop within the northwest corner of the park; trees and green spaces for public enjoyment, numerous seating areas, 16 decorative canopies to provide shade and lighting throughout the park, new hardscaping and landscaped areas, and bioswales or other treatment BMPs. The development of a public park and restaurant complex would improve views in the area, compared to the existing condition; with the inclusion of quality open space, public art, a visually attractive new building, and providing a sense of place for public recreation.

The new park and restaurant building complex would be visible from many surrounding vantage points including the adjacent public streets and sidewalks, Grand Park, as well as from other existing uses in the immediate area, such as the Los Angeles City Hall and City Hall Park. Compared to existing conditions, the proposed Project would contribute to the enhancement of views of Grand...
Issues

| Potentially Significant Impact | Less Than Significant Impact | With Mitigation | Less Than Significant Impact | No Impact |

Park, City Hall Park, and the Civic Center area of downtown Los Angeles. As such, the proposed Project would not have an adverse effect on a scenic vista and no impact would result.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Reference:  L.A. CEQA Thresholds Guide (Sections A.1 and A.2); City of Los Angeles General Plan; Central City Community Plan; California Department of Transportation, California Scenic Highway Mapping System

Comment: A significant impact would occur where scenic resources within a state scenic highway were damaged or removed as a result of the proposed Project.

The proposed Project is not located along or near an officially designated California Scenic Highway or locally designated scenic highway. The nearest highway to the Project site that is included in the California Scenic Highway Mapping System is Route 110, a designated Historic Parkway, also known as the Arroyo Seco Historic Parkway. The portion of Route 110 that is designated a Historic Parkway is located approximately 2.26 miles north of the Project site. Route 2, also known as the Angeles Crest Highway Scenic Byway is the nearest officially designated scenic highway, which is located approximately 10.87 miles north of the Project site in the San Gabriel Mountains.

The proposed Project would remove one magnolia tree from the public sidewalk adjacent to the Project site along Broadway. The removed tree would be replaced with the proposed Project along Spring Street. The number of trees planted as part of the Project would be in compliance with the Bureau of Street Services Urban Forestry Division’s Street Tree Replacement Policy. Additionally, no scenic resources such as groves of trees or rock outcroppings are located on the Project site. As such, no impact to scenic resources would occur.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Reference:  L.A. CEQA Thresholds Guide (Sections A.1 and A.2; Central City Community Plan

Comment: A significant impact would occur if the proposed Project introduced incompatible visual elements to the Project site or the area surrounding the Project site.
The Project site is located in a highly urbanized area in the Civic Center area of downtown within the City of Los Angeles. The proposed Project would improve the existing visual character and quality of the site and its surroundings by replacing a vacant lot with a public park and restaurant building complex. Installation and construction of landscaping, hardscaping, and lighting designed to function as public art, and a dining space for community enjoyment would also improve the existing visual character and quality of the site. Constructing the new public park and restaurant building complex would have a beneficial impact on the long-term visual quality of the project area because it would increase the amount of green space within the Civic Center area.

The proposed Project would be consistent with Chapter V, Urban Design, of the Central City Community Plan. The Plan states that “Because so little dedicated public open space exists in Downtown, creating a framework of civic open spaces and streets that provide necessary and suitable settings for the public life of the community is of the highest priority.” The proposed Project would address this by developing an open space public park for the enjoyment of the local community.

The proposed Project has the potential for short-term aesthetic effects during construction, due to grading and the storage of construction equipment and materials on-site. These effects would be temporary and occur within the property boundaries; however, these effects are similar in nature to the current temporary uses of the Project site for private events. As such, less than significant impacts to visual character would occur.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Reference: L.A. CEQA Thresholds Guide (Section A.4)

Comment: A significant impact would occur if the proposed Project caused a substantial increase in ambient illumination levels beyond the property line or caused new lighting to spill-over onto light-sensitive land uses such as residences, some commercial and institutional uses that require minimum illumination for proper function, and natural areas.

The Project site is currently illuminated by existing adjacent standard street lights along Spring Street on the east, 1st Street on the south, and Broadway on the west. Additional existing light sources associated with the Grand Park located within the same block, adjacent and north of the Project site.

Project construction would occur during daylight hours and, therefore, would
not require nighttime lighting. The proposed Project would include installation of new security lighting around the new facilities, which would operate regularly, and would be installed into the 16 decorative canopies that will be added throughout the park. The nighttime lighting fixtures that would be installed would direct the majority of the light within the park, and away from sensitive areas, to the maximum extent feasible; however, spillover impacts, including limited amounts of glare, could potentially occur at surrounding properties. Land uses adjacent to the Project site are commercial and public facilities, however a residential use (Times Mirror Towers) is proposed to be constructed directly south of the Project site. Compliance with applicable City regulations related to light and glare would ensure less than significant impacts. In addition, the Project area is highly urbanized and has a high level of existing lighting. As such, the proposed Project would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area. Impacts would be less than significant.

2. AGRICULTURE AND FOREST RESOURCES – Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Reference: California State Department of Conservation Farmland Mapping and Monitoring Program; City of Los Angeles General Plan Conservation Element; Zone Information & Map Access System (ZIMAS)

Comment: A significant impact would occur if the proposed Project resulted in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use.

No prime or unique farmland, or farmland of statewide importance exists within the project area or vicinity. The Project site is not located on or near any property zoned or otherwise intended for agricultural uses. Therefore, no impact to state-designated agricultural land would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Reference: California State Department of Conservation Farmland Mapping and Monitoring Program; City of Los Angeles General Plan Conservation Element; ZIMAS

Comment: A significant impact would occur if the proposed Project resulted in the
conversion of land zoned for agricultural use, or indicated under a Williamson Act contract, from agricultural use to a non-agricultural use.

No land on or near the Project site is zoned for or contains agricultural uses. As the City of Los Angeles does not participate in the Williamson Act, there are no Williamson Act properties within the Project site. Therefore, no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code Section 4526)?

References: City of Los Angeles General Plan; ZIMAS

Comment: A significant impact would occur if the proposed Project conflicted with an existing zoning classification of forest land or timberland, or caused rezoning of an area classified as forest land or timberland.

The Project site is currently zoned Public Facility (PF) and would be rezoned to Open Space (OS-2D) to allow the development of the public park use. The Project site is not within or near any areas classified as forest land or timberland. Therefore, the proposed Project would not conflict with the existing zoning for, or cause rezoning of, forest land or timberland resources, and no impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

References: Refer to Section 2 (c) above.

Comment: Refer to Section 2 (c) above.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?

Reference: Refer to Section 2 (a) and 2 (c) above.

Comment: Refer to Section 2 (a) and 2 (c) above.

3. AIR QUALITY – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Reference: L.A. CEQA Thresholds Guide (Sections B1 and B2); South Coast Air
### Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation</th>
<th>Less Than Significant</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Quality Management District, *2012 Air Quality Management Plan, 2012; City of Los Angeles General Plan; First & Broadway Civic Center Park Air Quality Technical Memorandum, 2018* (Appendix A)

Comment: A significant impact may occur if the proposed Project would conflict with or obstruct implementation of the applicable air quality plan.

The South Coast Air Quality Management District (SCAQMD) monitors air quality within the project area and the South Coast Air Basin, which includes Orange County and portions of Los Angeles, Riverside, and San Bernardino counties. The South Coast Air Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south.

Air quality plans describe air pollution control strategies to be implemented by a city, county, or regional air district. The primary purpose of an air quality plan is to bring an area that does not attain federal and state air quality standards into compliance with those standards pursuant to the requirements of the Clean Air Act and California Clean Air Act. The South Coast Air Basin is currently designated as nonattainment for 8-hour ozone and particulate matter with aerodynamic diameter less than 2.5 microns (PM$_{2.5}$) for both state and federal standards and nonattainment for particulate matter with aerodynamic diameter less than 10 microns (PM$_{10}$) for the state standards.

The most recent *Air Quality Management Plan* (AQMP) was adopted by the SCAQMD in February 2016. The AQMP was prepared by SCAQMD in partnership with the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (ARB), and is the legally enforceable blueprint for how the region will meet and maintain state and federal air quality standards.

Projects that would be consistent with the 2016 AQMP, and growth projections within the Southern California Association of Governments (SCAG) *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), would be considered to have a less than significant impact. Consistency with the AQMP is determined through evaluation of project-related air quality impacts and demonstration that project-related emissions would not increase the frequency or severity of existing violations, or contribute to a new violation of the air quality standards. As described in *Draft First & Broadway Civic Center Park Air Quality Technical Memorandum, 2018* (Appendix A), criteria established in the SCAQMD’s CEQA Air Quality Handbook were utilized to determine the proposed Project's consistency with applicable SCAQMD and...
SCAG policies, described below.

Nitrogen oxides (NO\textsubscript{x}), carbon monoxide (CO), PM\textsubscript{10}, and PM\textsubscript{2.5} emissions were analyzed for the proposed Project in order to: (1) ascertain potential effects on localized concentrations; and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards. As demonstrated in the analysis in Table 2 below, localized emissions would not exceed the SCAQMD-recommended localized thresholds.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG’s 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

Implementation of the proposed Project would not introduce new residential uses to the project area, and therefore population and housing projections for the region would not be affected. The commercial uses would generate minimal new employment that would have no potential to alter citywide and regional employment projections. The proposed Project would not have any potential to result in growth that would exceed the projections incorporated into the AQMP or the SCAG 2016–2040 RTP/SCS.

The proposed Project would comply with all applicable regulatory standards (e.g., SCAQMD Rules 402 and 403) as required by the SCAQMD. As demonstrated in this analysis, the proposed Project would not result in significant air quality impacts and no mitigation measures are required to reduce emissions. As such, the proposed Project meets this AQMP consistency criterion.

The proposed Project would be consistent with the City of Los Angeles General Plan. The Project site is zoned Public Facility (PF-2D) in the City of Los Angeles General Plan, which would be rezoned to Open Space (OS-2D) to allow for the construction of the park. The Project site is within the Central City Community Plan Area. The proposed Project would be consistent with goals and objectives within the Plan, namely to provide adequate facilities and identify neighborhoods where service is deficient. Therefore, because the proposed Project would be consistent with the goals and policies of the Plan and would be consistent with proposed zoning, the project is considered
consistent with the General Plan.

Implementation of the proposed Project would not interfere with air pollution control measures listed in the 2016 AQMP and would not conflict with the goals of the General Plan Air Quality Element. No significant impacts have been identified related to the proposed Project. Impacts will be less than significant and no mitigation measures are required.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Reference: L.A. CEQA Thresholds Guide (Sections B1 and B2); South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993; First & Broadway Civic Center Park Air Quality Technical Memorandum, 2018 (Appendix A)

Comment: A significant impact may occur if the proposed Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

**Construction**

Construction of the proposed Project would have a potentially significant air quality impact under this criterion if maximum daily emissions of any regulated pollutant exceeded the applicable SCAQMD air quality significance thresholds presented in Table 2. Daily emissions of regulated pollutants were quantified for each phase of construction activity. The estimate of fugitive dust emissions account for Rule 403 compliance. Examples of Rule 403 compliance include: a) All exposed areas will be frequently watered to reduce the generation of dust, and b) Vehicle speed of construction vehicles/equipment in exposed areas (i.e., unpaved access) shall be reduced to reduce the generation of dust.

Table 2 shows a comparison of the maximum daily emissions during each phase of construction to the applicable SCAQMD air quality significance thresholds. Maximum daily emissions of air pollutants that would be generated by proposed Project construction activities would not exceed any applicable regional or localized threshold values. Impacts would be less than significant and no mitigation is required. Additional details can be found in the technical air quality memorandum in Appendix A.
### Issues


Table 2
Estimated Daily Construction Emissions

<table>
<thead>
<tr>
<th>Phase</th>
<th>Daily Emissions (Pounds Per Day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>VOC</td>
</tr>
<tr>
<td>SITE GRADING</td>
<td></td>
</tr>
<tr>
<td>On-Site Emissions</td>
<td>1.6</td>
</tr>
<tr>
<td>Off-Site Emissions</td>
<td>0.2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1.8</strong></td>
</tr>
<tr>
<td>BUILDING CONSTRUCTION</td>
<td></td>
</tr>
<tr>
<td>On-Site Emissions</td>
<td>0.8</td>
</tr>
<tr>
<td>Off-Site Emissions</td>
<td>0.2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1.0</strong></td>
</tr>
<tr>
<td>PAVING</td>
<td></td>
</tr>
<tr>
<td>On-Site Emissions</td>
<td>0.5</td>
</tr>
<tr>
<td>Off-Site Emissions</td>
<td>0.1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0.7</strong></td>
</tr>
<tr>
<td>ARCHITECTURAL COATING</td>
<td></td>
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<tr>
<td>On-Site Emissions</td>
<td>9.2</td>
</tr>
<tr>
<td>Off-Site Emissions</td>
<td>0.1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>9.3</strong></td>
</tr>
<tr>
<td>REGIONAL ANALYSIS</td>
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<tr>
<td>Maximum Regional Daily Emissions</td>
<td><strong>9.3</strong></td>
</tr>
<tr>
<td>Regional Significance Threshold</td>
<td>75</td>
</tr>
<tr>
<td>Exceed Regional Threshold?</td>
<td>No</td>
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<tr>
<td>LOCALIZED ANALYSIS</td>
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<tr>
<td>Maximum Localized Daily Emissions</td>
<td>--</td>
</tr>
<tr>
<td>Localized Significance Threshold</td>
<td>--</td>
</tr>
<tr>
<td>Exceed Localized Threshold?</td>
<td>--</td>
</tr>
</tbody>
</table>

**Operation**

Implementation of the proposed Project would introduce approximately 992 daily vehicle trips to the project area on weekdays and approximately 1,271 daily vehicle trips on weekends, as well as marginally increase area source emissions. The results of operational emissions modeling are presented in Table 3. Maximum daily emissions of all regulated pollutants would remain substantially below the applicable SCAQMD operational mass daily thresholds. Therefore, implementation of the proposed Project would result in a less than significant impact related to operational air pollutant emissions, and no mitigation is required.
Issues

Table 3
Estimated Daily Operational Emissions

<table>
<thead>
<tr>
<th>Source Category</th>
<th>Daily Emissions (Pounds Per Day)</th>
<th>VOC</th>
<th>NOx</th>
<th>CO</th>
<th>SOx</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area</td>
<td></td>
<td>0.4</td>
<td>&lt;0.1</td>
<td>&lt;0.1</td>
<td>&lt;0.1</td>
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<td>&lt;0.1</td>
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<tr>
<td>Energy</td>
<td></td>
<td>0.1</td>
<td>1.2</td>
<td>1.0</td>
<td>&lt;0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>Mobile</td>
<td></td>
<td>1.7</td>
<td>7.5</td>
<td>16.3</td>
<td>&lt;0.1</td>
<td>3.7</td>
<td>1.0</td>
</tr>
</tbody>
</table>

ANALYSIS

Regional Total: 2.3 8.7 17.3 <0.1 3.8 1.1
Regional Significance Threshold: 55 55 550 150 150 55
Exceed Threshold? No No No No No No


c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Reference: L.A. CEQA Thresholds Guide (Sections B1 and B2); First & Broadway Civic Center Park Air Quality Technical Memorandum, 2018 (Appendix A)

Comment: A significant impact would occur if the proposed Project’s incremental air quality effects are considerable when viewed in connection with the effects of past, present, and future projects.

Construction

The South Coast Air Basin (SCAB) is designated as nonattainment of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for ozone (O₃), PM_{10}, and PM_{2.5}. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. Taking into account the existing environmental conditions, the SCAQMD propagated guidance that an individual project can emit allowable quantities of these pollutants on a regional scale without significantly contributing to the cumulative impacts. As discussed above in Section 3 (b) and shown in Table 2, air pollutant emissions associated with construction of the proposed Project would not exceed any applicable SCAQMD air quality thresholds of significance. Despite the region being in nonattainment of the ambient air quality standards for O₃, PM_{10}, and PM_{2.5}, the SCAQMD does not consider individual project emissions of lesser magnitude than the mass daily thresholds to be cumulatively considerable. The proposed Project would not result in a cumulatively considerable net increase of nonattainment pollutants. Therefore,
this impact would be less than significant and no mitigation is required.

**Operation**

Implementation of the proposed Project would create an open space public park incorporating a two-story restaurant building complex. Operations would not introduce a substantial source of long-term O$_3$ precursor emission or particulate matter emissions for which the SCAB is currently designated nonattainment. As discussed above, the SCAQMD has propagated guidance that the project-specific mass daily thresholds may be used as a reference metric to evaluate the potential for cumulatively considerable net increases in nonattainment pollutants. If the SCAQMD mass daily thresholds were exceeded, further analysis would be warranted to ensure that emissions would not be cumulatively considerable. However, as discussed above in Section 3 (b) and shown in Table 3, operation of the proposed Project would not exceed the SCAQMD mass daily threshold for VOC, NO$_x$, or particulate matter. Therefore, this impact would be less than significant and no mitigation is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Reference: *L.A. CEQA Thresholds Guide (Sections B1, B2, and B3); First & Broadway Civic Center Park Air Quality Technical Memorandum, 2018 (Appendix A)*

Comment: A significant impact may occur if construction or operation of the proposed Project generated pollutant concentrations to a degree that would significantly affect sensitive receptors.

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These people include children, older adults, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a location such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours.

**Construction**

The SCAQMD devised its Localized Significance Threshold (LST) values to prevent the occurrence of localized hot spots of criteria pollutant concentrations at sensitive receptor locations surrounding the Project site. The LST values
were determined using emissions modeling based on ambient air quality measured throughout the SCAB. If maximum daily emissions remain below the LST values during construction activities, it is highly unlikely that air pollutant concentrations in ambient air would reach substantial levels sufficient to create public health concerns for sensitive receptors. As shown in Table 2 above, maximum daily emissions of criteria pollutants and O₃ precursors from sources located on the Project site would not exceed any applicable LST values. Therefore, construction of the proposed Project would not result in exposure of sensitive receptors to substantial concentrations of criteria pollutants.

With regards to emissions of air toxics, carcinogenic risks, and non-carcinogenic hazards, the use of heavy duty construction equipment and haul trucks during construction activities would release diesel PM to the atmosphere through exhaust emissions. Diesel PM is a known carcinogen, and extended exposure to elevated concentrations of diesel PM can increase excess cancer risks in individuals. However, carcinogenic risks are typically assessed over timescales of several years to decades, as the carcinogenic dose response is cumulative in nature. Short term exposures to diesel PM would have to involve extremely high concentrations in order to exceed the SCAQMD Air Quality Significance Threshold of 10 excess cancers per million.

Over the course of construction activities, average diesel PM emissions from on-site equipment would be approximately 0.3 pounds per day, according to the technical air quality analysis prepared for the Project within Appendix A. Therefore, it is highly unlikely that diesel PM concentrations would be of any public health concern during the 24-month construction period, and diesel PM emissions would cease upon completion of construction activities. Therefore, this impact would be less than significant and no mitigation is required.

**Operation**

The proposed Project would introduce a new public park and restaurant building complex to the project area. The proposed Project does not include an industrial component that would constitute a new substantial stationary source of operational air pollutant emissions, nor does it include a land use that would generate a substantial number of heavy duty truck trips within the region. There would be no substantial source of air toxic emissions. Although a residential development (Times Mirror Towers) is planned in the future across 1st Street to the south, operation of the proposed Project would not involve any on-site sources of pollutants that would adversely affect future residents. The park and restaurant uses would not require any heavy equipment or large stationary emissions sources that could generate sufficient quantities of air pollutants to
result in significantly elevated concentrations at off-site locations. Additionally, as shown in Table 3 above, daily emissions of criteria pollutants would remain far below the applicable SCAQMD Air Quality Significance Thresholds. Therefore, this impact would be less than significant and no mitigation is required.

e) Create objectionable odors affecting a substantial number of people?  
Reference: L.A. CEQA Thresholds Guide (Sections B1 and B2); First & Broadway Civic Center Park Air Quality Technical Memorandum, 2018 (Appendix A)

Comment: A significant impact would occur if the project created objectionable odors during construction or operation that would affect a substantial number of people.

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

**Construction**

A significant impact would occur if construction or operation of the proposed Project would result in the creation of nuisance odors that would be noxious to a substantial number of people. Potential sources that may produce objectionable odors during construction activities include equipment exhaust, application of asphalt and architectural coatings, and other interior and exterior finishes. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project site, and would be temporary in nature and would not persist beyond the termination of construction activities. The proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Therefore, this impact would be less than significant and no mitigation is required.

**Operation**

The proposed Project would introduce a new open space public park with an incorporated restaurant building to downtown Los Angeles. According to the
SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies and fiberglass molding. Although, the restaurant would produce some odors and smells associated with the preparation of food, the restaurant operations would comply with SCAQMD Rule 402, which would prohibit any air quality discharge that would be a nuisance or pose any harm to the public. Furthermore, the Project site would not be developed with land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. Trash receptacles would be located and maintained in a manner that promotes odor control in accordance with the Los Angeles Clean Streets program and no adverse odor impacts are anticipated from these types of land uses. Therefore, this impact would be less than significant and no mitigation is required.

4. BIOLOGICAL RESOURCES – Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan Conservation Element; California Department of Fish and Wildlife California Natural Diversity Database Biogeographic Data Branch; California Native Plant Society Rare Plant Program

Comment: A significant impact would occur if the proposed Project removed or modified habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited.

Special-status plant species include those listed as Endangered, Threatened, Rare or those species proposed for listing (Candidates) by the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and the California Native Plant Society (CNPS). The CNPS listing

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1 Species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (Title 50 Code of Federal Regulations [CFR] 17.12 [listed plants], Title 50 CFR 17.11 [listed animals] and includes notices in the Federal Register for proposed species).

2 Species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (Title 14 California Code of Regulations 670.5).
is sanctioned by CDFW and serves as their list of “candidate” plant species that meet the definitions of the California Endangered Species Act (CESA), and are eligible for state listing.

Special-status wildlife species include those listed by the USFWS under the federal Endangered Species Act and by CDFW under CESA. USFWS and CDFW officially list species as either Threatened, Endangered, or as Candidates for listing. Additional species receive federal protection under the Bald Eagle Protection Act (e.g., bald eagle, golden eagle), the Migratory Bird Treaty Act (MBTA), and state protection under the California Environmental Quality Act (CEQA) Section 15380(d). All birds, except European starlings, English house sparrows, rock doves (pigeons), and non-migratory game birds such as quail, pheasant, and grouse, are protected under the MBTA. However, non-migratory game birds are protected under California Fish and Game Code Section 3503. Many other species are considered by CDFW to be California Species of Special Concern, and others are on a CDFW Watch List. The California Natural Diversity Database also tracks species within California for which there is conservation concern, including many that are not formally listed, and assigns them a California Natural Diversity Database (CNDDB) rank. Although Species of Special Concern, CDFW Watch List species, and species that are tracked by the CNDDB are not formally listed or afforded official legal status, they may receive special consideration during the CEQA review process. CDFW further classifies some species as "Fully Protected," indicating that the species may not be taken or possessed except for scientific purposes, under special permit from CDFW. Additionally, California Fish and Game Code Sections 3503, 3505, and 3800 prohibit the take, destruction or possession of any bird, nest, or egg of any bird except English house sparrows and European starlings unless authorization is obtained from the CDFW.

A search of relevant regional databases for special-status biological resources in the vicinity of the project area was conducted. This included a two-quad search based on the United States Geological Survey’s Hollywood and Los Angeles, CA quadrangles of CDFW’s CNDDB and CNPS electronic Inventory. A polygon level search around the project vicinity was conducted in USFWS’ Information for Planning and Consultation (IPaC) inventory. A review of these databases indicates that a combined total of 25 plant species from the CNDDB, CNPS, and IPaC; 17 wildlife species from the CNDDB; and 3 natural vegetation communities have been documented from the Hollywood, Los Angeles

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3 Plants listed as rare under the California Native Plant Protection Act (California Fish and Game Code Section 1900 et seq.).
quadrangles. The CNDDB and CNPS lists are included in Appendix B.

The Project site is located in the heavily-urbanized Civic Center community of the City of Los Angeles. The site is a vacant lot, with no on-site vegetation. One magnolia tree will be from the sidewalk area.

The IPaC listed the Coastal California Gnatcatcher (*Polioptila california californica*) as a threatened species, however, there is no critical habitat located at the Project site.

The CNDDB indicates that there is no suitable habitat available within the Project site for any of the special status species identified. As a result, the proposed Project would not result in a substantial adverse impact to listed, candidate, or otherwise sensitive special-status plant or wildlife species. However, due to the presence of magnolia and ficus trees which may provide suitable nesting habitat for birds protected under the MBTA, and which the magnolia tree may be removed during construction, direct impacts to suitable nesting habitat could occur. Additionally, noise and dust generated during construction could indirectly impact nesting birds by causing them to avoid the area during construction. Should tree removal and construction activities occur during the nesting bird season, generally considered to extend from February 15 through September 15, the implementation of the avoidance and minimization measures provided in Mitigation Measure BIO-1 would reduce impacts to nesting birds to a less than significant level.

Mitigation Measure BIO-1 is required as follows:

**Mitigation Measure BIO-1:** Exterior building improvements shall occur outside of the nesting season (February 15 through September 15). If avoidance of exterior construction work within this time period is not feasible, the following additional measures shall be employed:

1. A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.

2. If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, a qualified biologist shall monitor the nest on a weekly basis and the construction activity shall be postponed until the biologist determines that the nest is no longer active.
If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the appropriate resource agency before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan Conservation Element; California Department of Fish and Wildlife California Natural Diversity Database Biogeographic Data Branch; CDFW Descriptions of the Terrestrial Natural Communities of California

Comment: Sensitive natural communities are those that are designated as rare in the region by the CNDDB, provide potentially suitable habitat to support special-status plant or wildlife species, or receive regulatory protection (i.e., Section 404 of the Clean Water Act and/or Section 1600 et seq. of the California Fish and Game Code). Rare communities are given the highest inventory priority. Based on the review of the CNDDB, a total of three sensitive vegetative communities have been recorded within the Los Angeles and Hollywood quadrangles. None of these records coincide with the Project site. The site occurs in a heavily-urbanized community of the City of Los Angeles and no natural vegetation communities occur on-site. As a result, the proposed Project would not adversely affect any sensitive natural community or riparian habitat. No impact would occur and no mitigation measures are required.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan; U.S.C. Title 33, Chapter 26, Sections 101-607

Comment: A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, were modified or removed.

The Clean Water Act of 1997 (CWA), as amended, provides for the restoration and maintenance of the physical, chemical, and biological integrity of the
nation’s waters. The act sets up a system of water quality standards, discharge limitations, and permit requirements. Activities that have the potential to discharge dredge or fill materials into jurisdictional waters of the U.S., which include those waters listed in 33 Code of Federal Regulations 328.3 (Definitions), are regulated under Section 404 of the Act, as administered by US Army Corps of Engineers (Corps). Section 401 of the CWA requires a water quality certification from the state for all permits issued by the Corps under Section 404 of the Clean Water Act. The Regional Water Quality Control Board (RWQCB) is the state agency in charge of issuing a CWA Section 401 water quality certification or waiver.

The Porter-Cologne Water Quality Control Act is the basic water quality control law for California and works in concert with the CWA. Under Section 13000 et seq. of Porter-Cologne Water Quality Control Act, the RWQCB is the agency that regulates discharges of waste and fill material within any region that could affect a water of the state (Water Code 13260[a]), (including wetlands and isolated waters) as defined by the California Water Code Section 13050(e). A permit under the Porter-Cologne Water Quality Control Act is required prior to a project’s implementation, for impacts to water bodies and riparian habitat. Additionally, under Section 1602 of the California Fish and Game Code, a Streambed Alteration Agreement from CDFW is required prior to any activity that would result in the modification of the bed, bank, or channel of a state stream, river, or lake, including water diversion and damming and removal of vegetation from the floodplain to the landward extent of the riparian zone. This permit governs both activities that modify the physical characteristics of a stream and activities that may affect fish and wildlife resource that use a stream and surrounding habitat (i.e., riparian vegetation or wetlands).

The Project site occurs in a heavily-urbanized community of the City of Los Angeles and no federal or state-protected wetlands or other waters coincide with the Project site or would be affected by implementation of the project. As a result, no impacts would occur and no mitigation measures are required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan

Comment: A significant impact would occur if the proposed Project interfered or removed access to a migratory wildlife corridor or impeded the use of native
### Issues

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<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Mitigation Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
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<td>Less Than Significant Impact</td>
<td>With Mitigation</td>
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wildlife nursery sites.

In an urban context, a wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resource that encourages population growth and diversity. Habitat fragments are isolated patches of habitat separated by otherwise foreign or inhospitable areas, such as urban/suburban tracts or highways. Two types of wildlife migration corridors seen in urban settings are regional corridors, defined as those linking two or more large areas of natural open space, and local corridors, defined as those allowing resident wildlife to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development.

The Project site occurs in a heavily-urbanized community of the City of Los Angeles and there are no surface waters, drainages, or other corridors that allow for wildlife movement on or within the vicinity of the Project site. The site is not within an established wildlife corridor, and the proposed Project would not interfere with the movement of any native wildlife species. As a result, the proposed Project would not interfere with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, and would not impede the use of native wildlife nursery sites. However, as further described in Section 4(c), ornamental trees on-site may provide suitable nesting habitat for birds protected under the MBTA. Nesting birds may avoid the project vicinity due to increased levels of noise or dust during construction if it occurs during the nesting bird season (February 15 through September 15). Implementation of Mitigation Measure BIO-1 would reduce potential impacts on the movement and behavior of nesting birds to a less than significant level.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Reference:  
L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan; City of Los Angeles Department of Recreation and Parks Tree Care Manual

Comment: A significant impact would occur if the proposed Project caused an impact that was inconsistent with local regulations pertaining to biological resources.

Native tree species that measure four inches or more in cumulative diameter, four and one-half feet above the ground, including native oak (*Quercus* spp.),
southern California black walnut (*Juglans californica* var. *californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) are protected by the *Los Angeles Municipal Code*. Any tree grown or held for sale by a nursery, or trees planted or grown as part of a tree planting program, are not included in the definition of a protected tree. Should any of the species listed above that meet the size requirements need to be removed, relocated, or replaced, the proposed Project would comply with the City's protected tree ordinance.

The City of Los Angeles Board of Public Works tree removal policy requires replacing street trees at a two-to-one ratio for trees that are removed from the right-of-way. RAP also has a tree replacement policy that can be found within the RAP's *Tree Care Manual*. The RAP tree replacement policy requires “whenever trees are removed, the existing trees’ aggregate diameter, measures at breast height shall be replacement at an equal or greater rate of caliper of new trees.”

As part of the proposed Project one magnolia tree along Broadway would be removed and replaced in accordance with applicable City policies. However, the tree species is not considered a protected tree under the *Los Angeles Municipal Code*. Therefore, no impacts to trees protected under a tree preservation policy or ordinance would occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? □ □ □ □ ☒

Reference: *L.A. CEQA Thresholds Guide (Section C)*; *City of Los Angeles General Plan*

Comment: A significant impact would occur if the proposed Project were inconsistent with the provisions of the adopted habitat conservation plans of the cited type.

The Project site is located in a heavily-urbanized community of the City of Los Angeles and does not coincide with the boundaries of any adopted Habitat Conservation Plan or Natural Community Conservation Plan. As a result, the proposed Project would not conflict with an approved conservation plan and no impact would occur.

5. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance □ □ □ ☒
Issues

of a historical resource as defined in California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (Section D.3); Cultural Resources Assessment First & Broadway Civic Center Park Project, July 2018 (Appendix C)

Comment: A significant impact would result if the proposed Project caused a substantial adverse change to the significance of a historical resource.

A resource is generally considered “historically significant” if the resource meets at least one of the four criteria for listing on the California Register of Historical Resources (CRHR) (Public Resources Code Section 5024.1[a]). The CRHR is used as a guide by state and local agencies, private groups, and citizens to identify the state historical resources and to include which properties are to be protected, to the extent prudent and feasible, from substantial adverse change. The CRHR evaluation criteria are similar to the National Register of Historic Places (NRHP) criteria. For a property to be eligible for inclusion in the CRHR, it must meet one or more of the following criteria:

- It is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage;
- It is associated with the lives of persons important in our past;
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- It has yielded, or may be likely to yield, important information in prehistory or history.

A significant impact would result if the project caused a substantial adverse change to the significance of a historical resource, as defined in California Code of Regulations Section 15064.5. Five historical resources were identified within the project Area of Potential Effects (APE). Based on the information compiled from previous inventories and new information, the Court of Flags, Los Angeles City Hall, Los Angeles Law Library, Los Angeles Times Building, and the Los Angeles Civic Center Historic District located within the project APE are eligible for the NRHP and CRHR. One resource, Los Angeles City Hall, is listed as a Los Angeles Historic-Cultural Monument (LAHCM No. 150). Figure 7 shows the proximity of historical resources to the Project site.
The project was assessed to determine whether it would diminish any of the characteristics that qualify or define these historical resources in the APE that are adjacent to the Project site. The project will not destroy or alter any of the features that are important to the character-defining features of any of the historical resources; therefore, the project will not have any direct impacts on the resources. Additionally, indirect impacts of visual or audible intrusion will not result in an indirect substantial adverse change to the resources because the proposed Project would visually improve the area. As proposed, the project would result less than significant impacts on historical resources. No mitigation measures are necessary.
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (Section D.3); Cultural Resources Assessment First & Broadway Civic Center Park Project, 2018 (Appendix C)

Comment: A significant impact would occur if the proposed Project caused a substantial adverse change in the significance of an archaeological resource, which falls under the CEQA Guidelines section cited above.

A significant impact would occur if the project caused a substantial adverse change in the significance of an archaeological resource, as defined in California Code of Regulations Section 15064.5. Construction activities would include hazardous materials abatement, rough grading, utility installations, landscaping and hardscaping, construction of buildings, and installation of other park structures. The project may have direct impacts on subsurface archaeological resources that may be encountered during construction. Disturbance of archaeological resources would result in a significant impact under CEQA.

Archival research revealed that five archaeological sites, including one burial site, are located less than 0.25-mile west of the site. The closest site is less than 0.15-mile west of the Project site. Archaeological sites may also be buried by fill imported during the construction of the California State Building or its demolition. The lack of surface evidence of archaeological materials does not preclude the possibility that subsurface archaeological materials may exist. Based on the results of archival research, the Project site is culturally sensitive for prehistoric and/or historic archaeological resources.

Because the potential to encounter archaeological resources exists for this project, archaeological monitoring should be conducted during all ground-disturbing activities into native soils. A Final Compaction Report prepared for the Bureau of Engineering by Geocon West Inc. on December 10, 2014, states that the depths of excavation and backfill with artificial fill at the Project site all exceed 12 feet (refer to Figure 3 of the Final Compaction Report in Appendix G). Based on this information it is unlikely that native soil will be encountered, however if it is encountered Mitigation Measure CULT-1 should be implemented to reduce any potential impacts to less than significant levels.

Mitigation Measure CULT-1 is required as follows:

**Mitigation Measure CULT-1:** A qualified archeological monitor shall be present on-
site during all ground-disturbing activities, including, but not limited to, excavation, grading, and installation of utilities. The on-site archaeological monitor shall conduct worker training prior to the initiation of ground-disturbing activity in order to inform workers of the types of resources that may be encountered and apprise them of appropriate handling of such resources. If any prehistoric archaeological sites are encountered within the project area, consultation with interested Native American parties shall be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. A cultural resources monitoring and mitigation plan (CRMMP) shall be developed in order to outline monitoring protocols. The CRMMP shall identify key personnel and describe coordination, monitoring, and reporting responsibilities. Monitoring shall be completed by, or under the direction of, an archaeologist who meets Secretary of the Interior's Standards. The archaeological monitor shall have the authority to redirect construction equipment in the event that potential archaeological resources are encountered. If archaeological resources are encountered, work in the vicinity of the discovery shall halt until appropriate treatment or further investigation of the resource is determined by a qualified archaeologist in accordance with the provisions of CEQA Guidelines Section 15064.5.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: L.A. CEQA Thresholds Guide (Section D.1); Cultural Resources Assessment First & Broadway Civic Center Park Project, July 2018 (Appendix C)

Comment: A significant impact would occur if grading or excavation activities associated with the proposed Project disturbed unique paleontological resources or unique geologic features.

Project excavation activities are restricted to Phase 2 and Phase 4 of the Project and include deep excavations for foundations and footings (12-foot depth); and shallow excavation and grading for hardscaping, landscaping, and utilities. The proposed 12-foot-deep foundations and footings are in an area of the site that is documented as being covered by a 13- to 15-foot-thick layer of low paleontological potential artificial fill (refer to Geotechnical Investigation Report in Appendix D). Generally, ground-disturbance for hardscaping, landscaping, and utilities is shallow (less than 10 feet deep) and is therefore expected to be entirely within low paleontological potential artificial fill and Holocene alluvium. Project excavations are unlikely to uncover significant fossil vertebrate remains, however there is a potential to uncover previously unknown resources. Therefore, with implementation of Mitigation Measure CULT-2, potential impacts to paleontological resources during construction activities associated with the proposed Project would be less than significant. In addition, no
impact would occur from the operation of the proposed Project.

Mitigation Measure CULT-2 is required as follows:

**Mitigation Measure CULT-2**: Prior to the start of construction, a Qualified Paleontologist shall be retained to prepare and present a paleontological worker's environmental awareness program to all earth-moving personnel and their supervisors. The training shall inform construction personnel of the potential for fossil discoveries, types of fossils that may be encountered, and procedures to follow if potential fossils are unearthed at the Project site.

In the event of unanticipated fossil discoveries by construction personnel, work shall be halted within 50 feet of the discovery until the Qualified Paleontologist can evaluate the discovery. If the discovery is determined to be significant, the Qualified Paleontologist shall develop the appropriate plan (e.g., documentation, salvage, fossil preparation and identification, curation, and monitoring) in consultation with the City of Los Angeles RAP and BOE.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Reference: *L.A. CEQA Thresholds Guide (Section D.2); Cultural Resources Assessment First & Broadway Civic Center Park Project, July 2018 (Appendix C)*

Comment: A significant impact would occur if grading or excavation activities associated with the proposed Project disturbed interred human remains.

No formal cemeteries are known to exist within the Project site. However, the Project site has been determined by the Native American Heritage Commission (NAHC) to be potentially sensitive related to Native American resources. In the event that any human remains or related resources are discovered, Mitigation Measure CULT-1 above, and Mitigation Measure CULT-3 would be implemented to ensure that any potential impacts remain less than significant. In addition, no impact is anticipated from the operation of the proposed Project.

Mitigation Measure CULT-3 is required as follows:

**Mitigation Measure CULT-3**: A trained Native American consultant or consultants shall be engaged to monitor ground-disturbing activities when native soil is encountered. The consultant or consultants shall be selected from the interested Native American parties who consulted on the project. This monitoring shall occur on an as-needed basis as determined by BOE in consultation with interested tribes, and shall be intended to ensure that Native American concerns are taken into account during the construction process. The Native American consultant shall report findings
to BOE or its archaeological consultant, which will disseminate the information to the consulting Native American parties. The Native American parties identified by the NAHC shall be consulted regarding the treatment and final disposition of any materials of Native American origin found during the course of the project, if any, and will assist BOE in determining whether these materials constitute tribal cultural resources.

6. GEOLOGY AND SOILS – Would the project: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Reference: L.A. CEQA Thresholds Guide (Section E.1); California Department of Conservation Publication 42; City of Los Angeles General Plan Safety Element; California Department of Conservation Division of Mines and Geology. Earthquake Fault Zones and Seismic Hazard Zones Map, Hollywood Quadrangle; Geotechnical Investigation Report First and Broadway Park, March 2018 (Appendix D)

Comment: A significant impact would occur if the proposed Project were located within a state-designated Alquist-Priolo Zone or other designated fault zone and appropriate building practices were not followed.

The Project site is not located within a State of California Earthquake Fault Zone/Alquist-Priolo Special Study Zone. The Project site is located in a seismically active area, as is most of southern California. The nearest fault zone to the Project site is the Lower Elysian Park Thrust located approximately 2.5 miles southwest of the Project site. No active faults are known to cross or trend towards the Project site. The proposed Project would be designed and constructed in accordance with all applicable federal, state, and local codes relative to seismic criteria. Therefore, the proposed Project would not expose people or structures to potential adverse effects from the rupture of a known earthquake fault; and no impact would occur.

ii) Strong seismic ground shaking?

Reference: L.A. CEQA Thresholds Guide (Section E.1); City of Los Angeles General Plan Safety Element; California Department of Conservation Publication 42;
Comment: A significant impact would occur if the proposed Project design did not comply with building code requirements intended to protect people from hazards associated with strong seismic ground shaking.

As with most locations in southern California, the Project site is susceptible to ground shaking during an earthquake. As indicated in Section 6 (a)(i) above, the Project site is not located within an Alquist-Priolo Special Study Zone, and thus the potential for hazards associated with strong seismic ground shaking, such as ground surface rupture, affecting the site is considered low. The proposed Project would be designed and constructed in accordance with the latest version of the City of Los Angeles Building Code and other applicable federal, state, and local codes relative to seismic criteria. Therefore, the impact from strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction? ☐ ☒ ☐ ☐

Reference: L.A. CEQA Thresholds Guide (Section E.1); City of Los Angeles General Plan Safety Element Exhibit B; California Department of Conservation Publication 42; Earthquake Fault Zones and Seismic Hazard Zones Map, Hollywood Quadrangle; Geotechnical Investigation Report First and Broadway Park, March 2018 (Appendix D)

Comment: A significant impact would occur if the proposed Project were located in an area identified as having a high risk of liquefaction and appropriate design measures required within such designated areas were not incorporated into the project.

Liquefaction occurs when water saturated sediments are subjected to extended periods of shaking. Pressure increases in the soil pores temporarily alter the soil state from solid to liquid. Liquefied sediments lose strength, in turn causing the failure of adjacent infrastructure, including bridges and buildings. Whether a soil would resist liquefaction depends on a number of factors, including grain size, compaction and cementation, saturation and drainage, characteristics of the vibration, and the occurrence of past liquefaction. Granular, unconsolidated, saturated sediments are the most likely to liquefy, while dry, dense or cohesive soils tend to resist liquefaction. Liquefaction is generally considered to be a hazard where the groundwater is within 40 to 30 feet of the surface. With proper soil drainage, the pore pressure, which builds up when ground motion shakes unconsolidated soil, would be more easily dissipated; thus, soils with proper drainage are less likely to liquefy.
The Project site is located within a state- and City-designated liquefaction area. The potential for liquefaction to occur at the Project site is evaluated in the geotechnical the Geotechnical Investigation Report First and Broadway Park prepared by Fugro, which is included as Appendix D of this document. This investigation consisted of using SPT blow counts to determine the liquefaction susceptibility of the Project site. According to the accepted industry standard, in order to assume a soil is not susceptible, the soil should have a minimum plasticity index of 18. The tests conducted at the Project site revealed that soils tested had a plasticity index of 12 to 13. As such, impacts related to seismic-related ground failure and liquefaction could occur due to implementation of the proposed Project. However, as discussed in the Geotechnical Investigation Report First and Broadway Park, the proposed Project was determined to be geotechnically feasible provided that the recommendations presented in the report are incorporated into the design and construction of the proposed Project. Adherence to the Geotechnical Investigation Report First and Broadway Park, as well as implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts related to seismic-related ground failure and liquefaction to less than significant.

Mitigation Measures GEO-1 and GEO-2 are required as follows:

**Mitigation Measure GEO-1:** The proposed Project grading and foundation plans and specifications shall implement the recommendations presented in the Geotechnical Investigation Report First and Broadway Park. The proposed Project plans and specifications shall also be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the recommendations.

**Mitigation Measure GEO-2:** All grading, excavation, and construction of foundations should be performed under the observation and testing of a qualified Geotechnical Engineer during the following stages:

- Site grading;
- Excavation activities;
- Construction of building foundations and footings;
- Any other ground disturbing activities; and
- When any unusual or unexpected geotechnical conditions are encountered.

With implementation of Mitigation Measures GEO-1 and GEO-2, potential impacts related to liquefaction during construction activities associated with the proposed
### Issues

<table>
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<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
<th>Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Project would be less than significant. In addition, no impact would occur from the operation of the proposed Project.

iv) Landslides?  

- [x] Mitigation

Reference: *L.A. CEQA Thresholds Guide (Section E.1)*; *City of Los Angeles General Plan Safety Element Exhibit C*; *California Department of Conservation Publication 42*

Comment: A significant impact would occur if the proposed Project were located in an area identified as having a high risk of landslides and appropriate design measures required within such designated areas were not incorporated into the project.

The project is located in an area that is relatively flat and is not identified as a potential landslide hazard area by the California Department of Mines and Geology. Additionally, the Project site is not located within a City-designated hillside area or earthquake induced landslide area. Therefore, the proposed Project would not expose people or structures to potential adverse effects from landslides. No impact to landslides would occur.

b) Result in substantial soil erosion or the loss of topsoil?  

- [x] No Impact

Reference: *L.A. CEQA Thresholds Guide (Section E.2)*

Comment: A significant impact would occur if the proposed Project exposed large areas to the erosion effects of wind or water for a prolonged period of time.

The proposed Project would include ground-disturbing activities, such as excavation, grading and compaction of soil, landscaping, and paving. These activities could result in the potential for erosion to occur at the Project site, though soil exposure would be temporary and short-term in nature. During construction, standard measures would be employed to minimize soil erosion and runoff. As discussed in Section II, Subsection G, BMPs would be implemented for erosion and sedimentation control. Additionally, the majority of the Project site would be covered by landscaping, open seating areas, 16 decorative light canopies, and the restaurant facility components. No large areas of exposed soil would exist that would be exposed to the effects of erosion by wind or water. As such, the proposed Project would have less than significant impact to erosion and loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?  

- [x] No Impact
Reference: L.A. CEQA Thresholds Guide (Section C1); Geotechnical Investigation Report First and Broadway Park, March 2018 (Appendix D)

Comment: A significant impact would occur if the proposed Project were built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

One of the major types of liquefaction induced ground failure is lateral spreading of mildly sloping ground. Lateral spreading involves primarily side-to-side movement of earth materials due to ground shaking, and is evidenced by near-vertical cracks to predominantly horizontal movement of the soil mass involved. As discussed in Sections 6 (a)(iii) and 6 (a)(iv), the Project site is located in an area identified as being at risk for liquefaction, but is not located within a designated hillside area. All construction work would adhere to the latest version of the City of Los Angeles Building Code and other applicable federal, state, and local codes relative to liquefaction criteria. Additionally, implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts related liquefaction to less than significant.

Subsidence is the lowering of surface elevation due to changes occurring underground, such as the extraction of large amounts of groundwater, oil, or gas. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. However, the proposed Project does not anticipate the extraction of any groundwater, oil, or gas from the Project site. Therefore, no impacts to subsidence would occur.

Collapsible soils consist of loose dry materials that collapse and compact under the addition of water or excessive loading. Collapsible soils are prevalent throughout the southwestern United States, specifically in areas of young alluvial fans. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the geotechnical investigation conducted for the proposed Project, the northeast portion of the Project site is mapped as alluvium consisting of clay, sand, and gravel and the southwest portion is mapped as clay and sand of pre-development marshlands. Nonetheless, the proposed Project would be constructed in accordance with the latest version of the City of Los Angeles Building Code and other applicable federal, state, and local codes relative to seismic criteria. These building codes are designed to ensure safe construction. As such, impacts associated with on- or off-site landslides, lateral spreading, subsidence, and collapses would be less than significant.

According to the geotechnical investigation conducted for the proposed Project, 13 to 15 of primary structural fill material composed of medium dense to dense and locally very dense clayey san and very stiff to hard sandy lean clay were discovered on site locally mixed with onsite concrete crushed to three inches or less and...
incorporated into the fill. Brick fragments were also discovered at these depths during exploration. Alluvial materials were encountered below the artificial fill at depths of about 13 to 15 feet, and extended to 28 feet. Soft, gray materials of the Fernando Formation were encountered from the depth of 28 feet to the maximum explored 51.5 feet.

Nonetheless, the proposed Project would be constructed in accordance with the latest version of the City of Los Angeles Building Code and other applicable federal, state, and local codes relative to seismic criteria. These building codes are designed to ensure safe construction. As such, impacts associated with on- or off-site landslides, lateral spreading, subsidence, and collapses would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Reference: Geotechnical Investigation Report First and Broadway Park, March 2018 (Appendix D)

Comment: A significant impact would occur if the proposed Project were built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a risk to life and property.

Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area.

The geotechnical investigation conducted for the proposed Project included expansion index testing. The results indicated that the near surface soil (upper 5 feet) has a low expansion potential. However, the proposed Project would be constructed in accordance with the latest version of the City of Los Angeles Building Code and other applicable federal, state, and local codes relative to seismic criteria. As such, the proposed Project would not create a substantial risk to life or property resulting from expansive soils. Impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Reference: L.A. CEQA Thresholds Guide

Comment: A significant impact would occur if the proposed Project were built on soils...
that were incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system, and such a system were proposed.

Construction and operation of the proposed Project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact associated with the use of such systems would occur.

7. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?  

☐ ☐ ☑ ☐


Comment: A significant impact may occur if the proposed Project would generate greenhouse gas emissions that would have a significant impact on the environment.

Certain gases in the earth’s atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth’s surface temperature. A portion of the solar radiation that enters earth’s atmosphere is absorbed by the earth’s surface, and a smaller portion of this radiation is reflected back toward space. This infrared radiation (i.e., thermal heat) is absorbed by GHGs within the earth’s atmosphere; as a result, infrared radiation released from the earth that otherwise would have escaped back into space is instead “trapped,” resulting in a warming of the atmosphere. This phenomenon, known as the “greenhouse effect,” is responsible for maintaining a habitable climate on Earth. Without the naturally occurring greenhouse effect, Earth would not be able to support life as we know it.

GHGs are present in the atmosphere naturally, are released by natural and anthropogenic sources, and are formed from secondary reactions taking place in the atmosphere. Natural sources of GHGs include the respiration of humans, animals and plants, decomposition of organic matter, and evaporation from the oceans. Anthropogenic sources include the combustion of fossil fuels, waste treatment, and agricultural processes.

Carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are the GHGs that that are widely accepted as the principal contributors to human-induced global climate change and would be generated by the proposed Project. The majority of CO₂ emissions are byproducts of fossil fuel combustion. CH₄ is the main component of natural gas and is associated with agricultural practices and landfills. N₂O is a colorless GHG that results from industrial processes, vehicle emissions, and
agricultural practices.

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to CO₂. The GWP of a GHG is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time (i.e., lifetime) that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO₂, the most abundant GHG. GHGs with lower emissions rates than CO₂ may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than CO₂ (i.e., high GWP). The concept of CO₂-equivalents (CO₂e) is used to account for the different GWP potentials of GHGs to absorb infrared radiation.

The proposed Project would generate GHG emissions from construction equipment and vehicular traffic. CalEEMod was used to prepare estimates of annual GHG emissions. Table 4 presents the estimated emissions of GHGs that would be released to the atmosphere on an annual basis. Construction of the proposed Project would produce approximately 252.4 metric tons (MT) of CO₂e, or 8.4 MT CO₂e annually over a 30-year period. The proposed Project would generate approximately 992 daily weekday trips and approximately 1,271 daily weekend trips. The total annual operating emissions would be approximately 1,590 MT CO₂e per year after accounting for amortized construction emissions. This mass rate is substantially below the most applicable quantitative draft interim threshold of 3,000 MT CO₂e per year as recommended by the SCAQMD. Therefore, implementation of the proposed Project will result in a less than significant impact related to GHG emissions.

Table 4
Estimated Annual Greenhouse Gas Emissions

<table>
<thead>
<tr>
<th>Scenario and Source</th>
<th>Annual GHG Emissions (MT CO₂e per Year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Emissions Amortized (Direct) /a/</td>
<td>8.6</td>
</tr>
<tr>
<td>Area Source Emissions (Direct)</td>
<td>&lt;1</td>
</tr>
<tr>
<td>Mobile Source Emissions (Direct)</td>
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<tr>
<td>Energy – Natural Gas &amp; Electricity Emissions (Indirect)</td>
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<tr>
<td>Waste Disposal Emissions (Indirect)</td>
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<td>Water Distribution Emissions (Indirect)</td>
<td>67.1</td>
</tr>
<tr>
<td>Total Emissions</td>
<td>1,590.2</td>
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</tbody>
</table>

/a/ Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. Source: TAHA, 2018.

Exceed Threshold? No

SCAQMD Draft Interim Significance Threshold 3,000
No significant impacts have been identified related to the proposed Project. Impacts will be less than significant and no mitigation measures are required.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?


Comment: A significant impact may occur if the proposed Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, requires that statewide GHG emissions be reduced to 1990 levels by 2020. ARB’s Scoping Plan is the state’s plan to achieve the GHG reductions in California required by AB 32 and also reiterates the state’s role in the long-term goal established in Executive Order S-3-05, which is to reduce GHG emissions to 80% below 1990 levels by 2050.

ARB is required to update the Scoping Plan at least once every five years to evaluate progress and develop future inventories that may guide this process. ARB approved the first update to the Climate Change Scoping Plan: Building on the Framework in 2014 (ARB 2014). The Scoping Plan update confirms that the state is on track to meet the 2020 emissions reduction target, but will need to maintain and build upon its existing programs, scale up deployment of clean technologies, and provide more low-carbon options to accelerate GHG emission reductions, especially after 2020, in order to meet the 2050 target. The Scoping Plan update did not directly create any regulatory requirements for construction of the proposed Project. However, the Scoping Plan update includes recommended actions (e.g., Phase 2 heavy-duty truck GHG standard standards, enhance and strengthen the Low Carbon Fuel Standard) that would indirectly address GHG emissions from construction activities.

In May 2007, the City of Los Angeles released its Climate Action Plan (CAP), “Green LA: An Action Plan to Lead the Nation in Fighting Global Warming.” The Plan sets forth a goal of reducing the City’s greenhouse gas emissions to 35% below 1990 levels by the year 2030. The CAP is a voluntary plan that identifies over 50 action items, grouped into focus areas, to reduce emissions. ClimateLA is the
implementation program that provides detailed information, including a context, lead departments, and a timeline for completion, for each action item discussed in the GreenLA CAP. Where possible, the ClimateLA program document includes potential CO₂ emission reductions from full implementation of the measures.

The proposed Project would comply with plans, policies and regulations adopted for reducing emissions of GHGs including Assembly Bill 32 Scoping Plan, which includes goals such as the expansion of energy efficiency and producing energy from renewable resources. The City of Los Angeles has published the GreenLA, An Action Plan to Lead the Nation in Fighting Global Warming (the LA Green Plan), where the City will increase renewable energy generation, improve energy conservation and efficiency. Senate Bill 375 requires the metropolitan planning organizations to prepare an SCS in their regional transportation plans to achieve the per capita GHG reduction targets and the region’s SCS is contained within SCAG’s 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS focuses on job growth in high quality transit areas, resulting in more opportunity for transit-oriented development. The proposed Project would be located within walking distance of the Los Angeles County Metropolitan Transportation Authority Red/Purple Line Civic Center/Grand Park train station; and would be surrounded by various bus lines from Metro, Los Angeles Department of Transportation (LADOT) and Foothill Transit at 1st Street/Broadway, 1st Street/Spring Street, Temple Street/Broadway and Temple Street/Spring Street. These public transit lines would serve the Los Angeles downtown area and surrounding areas. The proposed Project would be consistent with the mobility and transit accessibility objectives of the RTP/SCS.

Executive Order (E.O.) B-30-15 established an interim GHG reduction target of 40 percent below 1990 levels by 2030, and E.O. S-3-05 established a long-term goal of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used. State sponsored studies conclude that deep reductions in GHG emissions can only be achieved with significant changes in electricity production, transportation fuels, and industrial processes. The systemic changes that will be required to achieve E.O. B-30-15 and E.O. S-3-05, if they are legislatively adopted, will require significant policy, technical, and economic solutions. The extent to which the proposed Project emissions and resulting impacts would be mitigated through implementation of statewide (and nationwide) changes is not known. However, some of the anticipated statewide actions (e.g., decarbonization, energy efficiency, alternative transportation) can be facilitated, at least to some extent, through implementation of specific GHG reduction measures in large-scale developments. The proposed Project includes policies related to planting drought-tolerant species resulting in reduced water. The proposed Project is not
inconsistent with anticipated long-term statewide strategies to reduce GHG emissions. Accordingly, the proposed Project would not conflict with the goals in E.O. B-30-15 and E.O. S-3-05.

No significant impacts have been identified related to the proposed Project. Impacts would be less than significant and no mitigation measures are required.

8. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 & F.2); Phase I Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, August 17, 2009; Phase II Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, August 31, 2009; Supplemental Phase II Environmental Site AssessmentFormer California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, March 18, 2013; Pre-Demolition Remediation 217 W 1st Street Parking Structure, Los Angeles, California Technical Memorandum, November 18, 2013

Comment: A significant impact would occur if the proposed Project utilized substantial amounts of hazardous materials as part of its routine operations and could potentially pose a hazard to the public under accident or upset conditions.

The project area formerly contained a 13-story California State Office Building with landscaping around the building’s footprint, a basement containing building operational equipment, and a sub-basement used for parking. The above-ground portions of the building were demolished in 1976 after enduring unsafe levels of damage during the San Fernando (Sylmar) earthquake in 1971. The remaining site underwent a project to remove all remaining components, and grade the site for open space uses in 2013. Trash and debris, lead-based paint, non-hazardous waste water, mold, and asbestos removal were undertaken as a part of the remediation process prior to demolition. The completed project no longer contained known environmental hazards, and has been maintained as an empty dirt lot since 2013.

Implementation of the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed Project may include removal of subsurface structures. Construction activities would be temporary in nature and would involve the limited transport, storage, use, and disposal of hazardous materials. Such hazardous materials could include on-site fueling/servicing of
construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, United States Environmental Protection Agency, the Occupational Safety & Health Administration, the City of Los Angeles Fire Department, and the Los Angeles County Department of Public Health. The transport, use, and disposal of construction-related hazardous materials would occur in accordance with applicable federal, State, and local regulations governing such activities. Therefore, the short-term construction impact would be less than significant.

Long-term operation of the proposed Project would involve the continued limited transport, storage, use, and disposal of hazardous materials. Additionally, the proposed Project would not generate industrial wastes or toxic substances during operation. Therefore, project operation would not pose a significant hazard to the public or the environment. No operational impact related to hazardous materials would occur.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 & F.2); Phase I Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, August 17, 2009; Phase II Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, August 31, 2009; Supplemental Phase II Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, March 18, 2013; Pre-Demolition Remediation 217 W 1st Street Parking Structure, Los Angeles, California Technical Memorandum, November 18, 2013

Comment: Refer to Section 8 (a) above.

Asbestos-containing materials (ACMs) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is, however, potential for exposure when ACMs become damaged to the extent that asbestos fibers become airborne and are inhaled. These airborne fibers are carcinogenic and can cause lung disease. The age of a building is directly related to its potential for containing elevated levels of ACMs. Asbestos was utilized routinely in many building materials...
Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACMs, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance could result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, structures built before 1978 are likely to contain LBP, as well as those built shortly thereafter, as the phase-out of LBP was gradual.

As discussed in section 8(a), all existing structures were remediated and removed in 2013. This remediation included pre-construction evaluation, removal, and post-construction investigation for the presence of ACMs and LBP. The Project site has remained free of the ACMs and LBP since the completion of the 2013 demolition project. Therefore, there are no potential impacts related to hazardous materials located on the Project site.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Reference: L.A. CEQA Thresholds Guide (Section F.2); ZIMAS; Los Angeles Unified School District Local District Map 2015-2016

Comment: A significant impact would occur if the proposed Project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which would pose a hazard beyond regulatory thresholds.

There are no schools located within one-quarter mile of the Project site, and there would be no release of toxic emissions.

As discussed in Section 8 (a), hazards located within the project area were remediated in 2013, with no additional hazards re-introduced to the Project site in the intervening years. The current project does not propose to utilize hazardous materials in the construction or operation of the restaurant or park facilities. Therefore, there is no potential for impacts related to hazardous materials within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result,
would it create a significant hazard to the public or the environment?

Reference: *L.A. CEQA Thresholds Guide (Section F.2); EnviroStor; GeoTracker*

Comment: A significant impact would occur if the proposed Project were located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, created a significant hazard to the public or the environment.

The Project site is not listed in the State Water Resources Control Board (SWRCB) GeoTracker system which includes leaking underground fuel tank sites and spills, leaks, investigations, and cleanups sites; or the Department of Toxic Substances Control EnviroStor Data Management System which includes CORTESE sites, or the Environmental Protection Agency’s database of regulated facilities. Although no hazardous materials sites exist on the Project site, two permitted hazardous materials sites exist 0.09 miles southwest of the Project site, however, required site activity has been limited to compliance site inspections.

While unlikely, should contaminated soils be encountered during construction of the proposed Project, excavated material (e.g., soil, slurry, and groundwater) would be monitored and tested prior to disposal. Excavated material that is deemed hazardous would be subject to strict federal, state, and local regulations for its handling, transport, and disposal. These activities would occur under the oversight of the California Department of Toxic Substances Control, SWRCB, and the Los Angeles Fire Department. Adherence to federal, state, and local standards would minimize the risk to the public or the environment. Therefore, the impact would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Reference: *General Plan, L.A. CEQA Thresholds Guide (Section F.1); LACDRP Airport Land Use Commission Airports - Los Angeles County*

Comment: A significant impact would occur if the Project site were located within a public airport land use plan area, or within two miles of a public airport, and created a safety hazard.

The Project site is not located within an airport land use plan, or within two miles of a public airport or public use airport. The Project site is located approximately 12 miles southeast of the Hollywood Burbank Airport, west of the San Gabriel Valley Airport,
<table>
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<th>Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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<td>and north of the Compton/Woodley Airport, respectively. Therefore, no safety hazard associated with proximity to an airport is anticipated for the proposed Project. No impact would occur.</td>
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<tr>
<td>f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</td>
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<tr>
<td>Reference: <em>L.A. CEQA Thresholds Guide (Section F.1)</em>; Comment: A significant impact would occur if the proposed Project were in the vicinity of a private airstrip and resulted in a safety hazard for people residing or working in the project area.</td>
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<tr>
<td>The Project site is not located within the vicinity of a private airstrip. Therefore, no safety hazard from proximity to a private airport or airstrip is anticipated from the proposed Project. No impact would occur.</td>
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<td>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
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<tr>
<td>Reference: <em>L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan</em> Comment: A significant impact would occur if the proposed Project substantially interfered with roadway operations used in conjunction with an emergency response plan or evacuation plan or generated sufficient traffic to create traffic congestion that would interfere with the execution of these plans.</td>
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<tr>
<td>During construction activities, vehicles and equipment would access the site via the proposed entrance located along Spring Street. Limited lane closures are anticipated during construction activities. During construction, ingress and egress to the site and surrounding properties, particularly for emergency response vehicles, would be maintained at all times. In addition, operation would not permanently alter the adjacent street system. Therefore, construction and operation of the proposed Project would not impair or interfere with implementation of an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.</td>
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<td>h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</td>
<td>☐ ☐ ☐ ☒</td>
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<tr>
<td>Reference: <em>L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan</em></td>
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</table>
**Issues**

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation</th>
<th>Less Than Significant</th>
<th>No Impact</th>
</tr>
</thead>
</table>

**Plan Safety Element Exhibit D**

Comment: A significant impact would occur if the proposed Project were located in a wildland area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

The Project site is not located within a designated High Fire Hazard Severity Zone according to the *City of Los Angeles General Plan*. The Project site and surrounding areas are completely developed and there are no wildlands adjacent to the site. Therefore, no impact related to wildland fires would occur.

### 9. HYDROLOGY AND WATER QUALITY – Would the project:

| a) Violate any water quality standards or waste discharge requirements? |

Reference: L.A. CEQA Thresholds Guide (Section G.2); Phase I Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, August 17, 2009; Phase II Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, August 31, 2009; Supplemental Phase II Environmental Site Assessment Former California State Building (Vacant Parcel) 217 West 1st Street, Los Angeles, California 90012, March 18, 2013; Pre-Demolition Remediation 217 W 1st Street Parking Structure, Los Angeles, California Technical Memorandum, November 18, 2013

Comment: A significant impact would occur if the proposed Project discharged water which did not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems such as the Los Angeles Regional Water Quality Control Board. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As discussed in section 8(a), non-hazardous waste water was removed from the Project site during the 2013 site clean-up project. Approximately 485,000 gallons of waste water containing elevated levels of coliform bacteria and soluble lead concentrations above drinking water standards were removed from the former onsite sub-basement that pooled and concentrated over time from stormwater infiltration. The Project site currently contains no pooled water, and no waste water contaminants.

The proposed Project would not violate a water quality standard or waste discharge requirement. Construction activities, such as grading and excavation, would result in the disturbance of soil and temporarily increase the potential for soil erosion. Additionally, construction activities and equipment would require the on-site use and
### Issues

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<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation</th>
<th>Less Than Significant</th>
<th>No Impact</th>
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</table>

Storage of fuels, lubricants, and other hydrocarbon fluids. Storm events occurring during the construction phase would have the potential to carry disturbed sediments and spilled substances from construction activities off-site to nearby the catch basins. However, contractor will implement a storm water pollution plan (SWPPP) which is mandated by the State of California and the City of Los Angeles to prevent contaminant from escaping the construction site. Prior to issuance of grading or building permits, the Applicant shall submit a Low Impact Development (LID) Plan to the City of Los Angeles Bureau of Sanitation (LASAN) Watershed Protection Division (WPD), for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

For implementation of the proposed Project, prior to the start of construction, BOE would be required to obtain a General Construction Activity Stormwater Permit, issued by the State Water Resources Control Board. One of the conditions of the General Permit is the development and the implementation of a SWPPP, which would identify structural and nonstructural BMPs to be implemented during the construction phase. As discussed in Section II Subsection G, BOE would also develop and implement an erosion control plan for the proposed Project. BMPs developed for the SWPPP and the erosion control plan may include, but not be limited to, minimizing the extent of disturbed areas and duration of exposure; stabilizing and protecting disturbed areas; keeping runoff velocities low; retaining sediment within the construction area; and the use of temporary desilting basins, silt fences, gravel bag barriers, temporary soil stabilization, temporary drainage inlet protection, and diversion dikes and interceptor swales. With implementation of BMPs, the proposed Project would not violate any water quality standards or waste discharge requirements. Therefore, impacts on water quality from construction activities would be less than significant.

In addition, the proposed Project includes the installation of stormwater and drainage infrastructure throughout the complex. Upon completion of the proposed Project, storm flows would be directed to the existing municipal storm drain system. The proposed Project would include a bioswale system that would allow water infiltration into the ground. There would be no exposed soil remaining at the completion of rehabilitation activities; therefore, there would be no potential for soil erosion or contamination. No long-term impact to water quality would occur during project operations.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned development.)
Uses for which permits have been granted)?

Reference: *L.A. CEQA Thresholds Guide (Sections G.2 and G.3); Geotechnical Investigation Report First and Broadway Park, March 2018 (Appendix D); Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle*

Comment: A project would have a significant impact on groundwater supplies if it resulted in a demonstrable and sustained reduction of groundwater recharge capacity or changed the potable water levels sufficiently that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduced the yields of adjacent wells or well fields, or adversely changed the rate or direction of groundwater flow.

The geotechnical investigation completed for the proposed Project encountered groundwater in four boring holes ranging from approximately 23 to 25 feet below the ground surface (bgs).

Construction of the proposed Project would excavate to approximately 12 feet deep when foundation piles are installed within the indoor pool and indoor gymnasium footprints. However, construction activity that has the potential to encounter groundwater would be required to comply with the recommendations set forth in the Geotechnical Engineering Report, such as proper disposal of displaced groundwater and dewatering during construction of the pool. Implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts related to groundwater during construction to less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Reference: *L.A. CEQA Thresholds Guide (Sections G.1 and G2)*

Comment: A significant impact would occur if the proposed Project resulted in a substantial alteration of drainage patterns that resulted in a substantial increase in erosion or siltation during construction or operation of the project.

As previously discussed, the proposed Project would implement BMPs that would minimize short-term construction impacts of erosion. Therefore, the proposed Project would not result in substantial erosion from altered drainage patterns and the impact would be less than significant.

The proposed stormwater and drainage infrastructure would improve the drainage pattern of runoff and stormwater from the Project site to the existing municipal storm infrastructure in the project area by including a channelized area through which to...
Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
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<th>Mitigation</th>
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Direct water runoff into existing water systems. The proposed Project would include a bioswale system that would allow water infiltration into the ground. Therefore, construction and operation of the proposed Project would not result in substantial erosion or siltation off-site. Impacts would be less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Reference: L.A. CEQA Thresholds Guide (Section G.1)

Comment: A significant impact would occur if the proposed Project resulted in increased runoff volumes during construction or operation of the proposed Project that would result in flooding conditions affecting the Project site or nearby properties.

As discussed in Section 9 (a), the proposed Project would not result in a substantial increase of impervious surfaces at the Project site as facilities within the park are to be demolished and constructed elsewhere on the site. Although the proposed Project would increase the amount of impervious surfaces, the increase would not be substantial. The proposed Project also includes the installation of stormwater and drainage infrastructure throughout the park and the installation of permeable pavers and vegetation swales. The proposed Project would include a bioswale system that would allow water infiltration into the ground. Therefore, implementation of the proposed Project would not substantially alter and would serve to improve the existing drainage pattern such that flooding would not occur. The impact would be less than significant.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Reference: L.A. CEQA Thresholds Guide (Section G.2)

Comment: A significant impact would occur if the volume of runoff increased to a level, which exceeded the capacity of the storm drain system serving a Project site. A significant impact would also occur if the proposed Project substantially increased the probability that polluted runoff would reach the storm drain system.

As discussed in Section 9 (a), the proposed Project would not result in a substantial increase of impervious surfaces at the Project site as facilities within the park are to be demolished and constructed elsewhere on the site. Although the proposed Project would increase the amount of impervious surfaces, the increase would not be substantial. Furthermore, the proposed Project includes stormwater and drainage
infrastructure that would serve to improve the drainage pattern of the Project site. Therefore, the proposed Project would not contribute runoff water exceeding the capacity of stormwater drainage systems. As discussed, BMPs would be implemented to control runoff from the Project site during the construction phase. The proposed Project would include a bioswale system that would allow water infiltration into the ground. The impact would be less than significant.

f) Otherwise substantially degrade water quality? □ □ □□

Reference: Refer to Section 9 (a) above.

Comment: Other than the construction sources of pollutants described previously (i.e., fuels from construction equipment, etc.), the proposed Project would not include other potential sources of contaminants that could degrade water quality. Additionally, as discussed in Section II Subsection G, BMPs would be implemented to control runoff from the Project site during construction to prevent the degradation of water quality. The proposed Project would include a bioswale system that would allow water infiltration into the ground. Therefore, impacts to water quality would be less than significant.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? □ □ □ □ □

Reference: L.A. CEQA Thresholds Guide (Sections G.1 to G.3); City of Los Angeles General Plan Safety Element; Flood Insurance Rate Map, Panel 1636F

Comment: A significant impact would occur if the proposed Project placed housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

No 100-year flood zones coincide with the Project site. However, according to Flood Insurance Rate Map Number 1636F, the entire Project site is located within an area designated as Zone X, which is categorized as an area that is within a 500-year flood zone. Notwithstanding, the proposed Project does not include a residential component. Therefore, the proposed Project would not place housing within a 100-year flood zone, and no impact would occur.
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Reference: L.A. CEQA Thresholds Guide (Sections G.1 & G.3); FEMA Flood Insurance Rate Map Number 1636F

Comment: A significant impact would occur if the proposed Project placed within a 100-year flood hazard area structures that would impede or redirect flood flows.

As noted in Section 9 (g) above, the Project site is located within a 500-year flood hazard area. The proposed Project includes the installation of stormwater and drainage infrastructure throughout the park, which would serve to improve the drainage pattern of runoff and stormwater from the Project site to the existing municipal stormwater infrastructure in the project area. The impact would be less than significant.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Reference: L.A. CEQA Thresholds Guide (Sections E.1 & G.3); City of Los Angeles General Plan Safety Element

Comment: A significant impact would occur if the proposed Project were located in an area where a dam or levee could fail, exposing people or structures to significant risk of loss, injury or death.

According to the City of Los Angeles General Plan Safety Element, the Project site is not located within the potential inundation area of the Hollywood Reservoir and the Silver Lake Reservoir. The inundation area is based on an assumed catastrophic failure of dams during peak storage capacity. Furthermore, current design and construction practices and ongoing review, modification, and dam reconstruction programs are intended to ensure that all dams are capable of withstanding the maximum magnitude earthquake for the site. Therefore, the potential for the Project site to be inundated as a result of a dam failure, and potential exposure of people and structures to flooding due to dam failure, is low. Impacts would be less than significant.

Additionally, construction and operation of any below or above ground elements would be in accordance with building and seismic code requirements. No new structures would be constructed on the site that would be vulnerable to flooding or inundation in the event of a dam break and would not impede or redirect flood flows in the project area. No housing would be constructed on the site that would expose people to flooding. In the event of an emergency, the City has adopted emergency evacuation procedures that would be implemented in the case of a dam break.
Therefore, the proposed Project would not result in exposure of people or structures to significant risk of loss, injury or death related to flooding or dam inundation. Therefore, the potential impact of the proposed Project from being within an inundation area of a dam or levee is less than significant.

j) Inundation by seiche, tsunami, or mudflow?

Reference: L.A. CEQA Thresholds Guide (Section E.1); City of Los Angeles General Plan Safety Element; Department of Conservation Tsunami Inundation Maps

Comment: A significant impact would occur if the proposed Project caused or accelerated geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. The Project site is not located near an enclosed large body of water that could experience seiches during an earthquake. Thus, no impact would occur.

Tsunamis are tidal waves generated in large bodies of water caused by fault displacement or major ground movement. Hazardous tsunamis, which are rare along the Los Angeles coastline, have the potential to cause flooding in the low-lying coastal area. The Project site is located approximately 7.2 miles from the Pacific Ocean and is not located within a tsunami hazard area. Therefore, no impact would occur.

As discussed in Section 6 (a)(iv), the Project site is not located within a City-designated hillside area and would not be subject to a landslide. Therefore, no impact associated with inundation from mudflow would occur.

10. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?

Reference: L.A. CEQA Thresholds Guide (Section H.2); City of Los Angeles General Plan; Central City Community Plan

Comment: A significant impact would occur if the project included features such as a highway, above-ground infrastructure, or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier within an established community.

The proposed Project would be constructed within the Project site parcel in the Civic Center area of downtown Los Angeles, and is within the Central City Community Plan Area. Neither construction nor operation of the proposed Project would include features such as a highway or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier
within an established community. The Project site would include the construction of a 1.96-acre public park with green spaces for public enjoyment, numerous seating areas, 16 decorative canopies for shade and lighting throughout the site, and a stream-themed bioswale. A 19,200-square-foot, two-story building would be constructed in the northwest corner of the proposed Project. This building would include a restaurant, café, and beer garden. None of these proposed uses would create a disruption or physical barrier to the established community, because they are intended to provide dining and gathering places within the park for visitors and residents, including residents of the future proposed Times Mirror Towers. Therefore, the proposed Project would not physically divide an established community, and no impact would occur.

### Issues

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<th>Less Than Significant Impact</th>
<th>No Impact</th>
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</table>

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Reference: L.A. CEQA Thresholds Guide (Sections H.1 & H.2); City of Los Angeles General Plan; ZIMAS; Central City Community Plan

Comment: A significant impact would occur if the proposed Project were inconsistent with the General Plan, or other applicable plan, or with the site’s zoning if designated to avoid or mitigate a significant potential environmental impact.

The Project site is located entirely within the City of Los Angeles in the Central City Community Plan Area. The Central City Community Plan establishes the goals, objectives, policies, and programs applicable to the Central City Community Plan Area. The City’s current zoning designation for the Project site is PF-2D (Public Facilities). The Project site would be developed into a public park, and would require re-zoning to OS-2D (Open Space) to reflect the change in land use. However, the park would continue to be operated under RAP jurisdiction, with a qualified business holding a contract with RAP for the restaurant food and beverage concessions within the site. Therefore, the proposed Project would not conflict with the existing zoning or General Plan designations for the Project site. No impact would occur.

The proposed Project is also consistent with the goals and policies set forth in the Central City Community Plan. The Plan advocates the development of parks in the community. Objective 4-1 encourages the addition of open spaces within the downtown area. Policy 4-1.1 encourages the creation of open spaces as focal points in downtown neighborhoods. As such, the proposed Project would be consistent with land use plans and policies contained in the Central City Community Plan.
Accordingly, no impacts to applicable land use plans would occur.

Los Angeles Municipal Code requires that 21 parking spaces be constructed for the proposed restaurant; therefore, a parking variance would be required for the Project. Existing parking and public transportation facilities within walking distance would be available to park and restaurant patrons, and would be leased by the restaurant operators specifically to accommodate parking needs for restaurant patrons. As detailed in the Traffic Study (Appendix F), the proposed Project would not significantly impact area parking supplies. Adequate parking would remain available at the Olive Street & 1st Street Parking Lot and the Judge John Aiso Street & 1st Street Parking Structure. No impacts would result.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Reference: L.A. CEQA Thresholds Guide (Sections H.1 & H.2); City of Los Angeles General Plan; Central City Community Plan

Comment: A significant impact would occur if the proposed Project were located within an area governed by a habitat conservation plan or natural community conservation plan and conflicted with such plan.

As previously discussed in Section 4 (d), the Project site is not located in a habitat conservation plan or a natural community conservation plan. As such, the proposed Project would not conflict with the provisions of an approved conservation plan, and no impact would occur.

11. MINERAL RESOURCES – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Reference: L.A. CEQA Thresholds Guide (Section E4); City of Los Angeles General Plan; California Geological Survey Aggregate Sustainability in California, 2012; California Department of Conservation Division of Oil, Gas, & Geothermal Resources Well Finder.

Comment: A significant impact would occur if the proposed Project were located in an area used or available for extraction of a regionally important mineral resource, if the project converted a regionally important mineral extraction use to another use, or if the project affected access to such use.

There are 11 oil wells located within one mile of the project area, and no wells located within a 0.5-mile radius of the project area. None of the wells extract...
regionally-important mineral resources. Furthermore, the proposed Project would not include convert any regionally important mineral extractions sites to any other uses, or affect the ability mine regionally important minerals. Therefore, the proposed Project is not anticipated to result in the loss of availability of a valuable known mineral resource and no impact is anticipated.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Reference: Refer to Section 11 (a) above.

Comment: Refer to Section 11 (a) above.

12. NOISE – Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Reference: City of Los Angeles Municipal Code (Chapter IV, Article 1, Section 41.40; Section 112.05 of Chapter IX, Article 2); L.A. CEQA Thresholds Guide (Section I); Noise and Vibration Impact Study, Terry A. Hayes Associates, 2018 (Appendix E)

Comment: A significant impact would occur if the proposed Project exposed persons to or generated noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Existing Noise Levels

The impact analysis is predicated on the location of noise- and vibration-sensitive land uses and the existing setting. Sensitive receptors are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. They typically include residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas.

The area immediately surrounding the Project site is completely urbanized and developed with Grand Park and a Los Angeles County courthouse to the north, the Los Angeles City Hall and City Hall Park to the east, the Los Angeles Police Department Headquarters to the southeast, office buildings and the Times Mirror building (formerly the Los Angeles Times building) to the south, the Los Angeles Federal Courthouse to the southwest, and the Los Angeles Law Library to the west. The existing nearby parks is not considered particularly sensitive to noise or vibration due to their urban nature. Commercial and municipal land uses are also not typically considered sensitive to noise or vibration. The proposed Times Mirror Towers project...
would potentially include 1,127 residential units within multiple structures, which would be sensitive to changes in permanent noise levels from the existing condition. Therefore, the following analysis focuses on the Los Angeles Law Library and Times Mirror Towers, which are located approximately 115 feet to the west and south of the Project site. The Los Angeles Law Library is open Monday, Wednesday, Thursday, and Friday from 8:30 a.m. to 6:00 p.m., Tuesday from 8:30 a.m. to 8:00 p.m., and Saturday from 9:00 a.m. to 5:00 p.m.

The existing noise level at the corner of 1st Street and Broadway was monitored on Wednesday, June 20, 2018 at 12:25 p.m. using a SoundPro DL Sound Level Meter. This time of day represents a typical construction time without the added noise source of peak hour traffic. The monitored 15-minute noise level was 67.1 dBA Leq.

Construction Noise

Construction activity is anticipated to begin in Summer/Fall 2019 and take approximately two years to complete, concluding in Summer/Fall 2021. LAMC allows construction activity to occur Monday through Friday between the hours of 7:00 a.m. and 9:00 p.m., although daily construction would not likely occur after 6:00 p.m. Construction would occur between the hours of 8:00 a.m. and 6:00 p.m. on Saturdays. There would be no construction activities on Sundays or federal holidays, and no construction would occur during prohibited hours.

**Equipment:** Typical noise levels from various types of equipment that may be used during construction are listed in Table 5. The table shows noise levels at distances of 50 feet from the construction noise source. Construction activities typically require the use of numerous pieces of noise-generating equipment. The noise levels shown in Table 6 take into account that multiple pieces of construction equipment would be operating simultaneously. When considered as an entire process with multiple pieces of equipment, project-related activity (i.e., ground clearing and site preparation) would generate noise levels between 84 and 89 dBA Leq at 50 feet.

Construction noise is not typically a concern for human health and is a common occurrence within the urban environment. The existing nearby parks are not considered particularly sensitive to noise or vibration due to their urban nature. Commercial and municipal land uses are also not typically considered sensitive to noise or vibration. The proposed Project is anticipated to be completed before the construction of the Times Mirror Towers project. Therefore, the following analysis focuses on the Los Angeles Law Library, which is located approximately 115 feet to the west of the Project site. Based on a typical noise level of 89 dBA Leq at 50 feet for sustained equipment activity, the maximum noise level at the Los Angeles Law Library would be 82 dBA Leq. The impact analysis is based on the construction limits in the LAMC. Construction activity would comply with the allowable hours of
construction in the LAMC, including 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction activity on Sundays or federal holidays. The LAMC limits equipment noise levels to 75 dBA $L_{eq}$ at 50 feet unless technically infeasible. Unmitigated noise levels would typically exceed the allowable noise level stated in the LAMC. Therefore, without mitigation, the proposed Project would result in a significant impact related to on-site construction noise. The implementation of Mitigation Measures NOI-1 through NOI-8 would ensure impacts are reduced to a less than significant level. The equipment mufflers associated with Mitigation Measure NOI-1 would reduce construction noise levels by approximately 3 dBA and the Mitigation Measure NOI-8 would reduce noise levels by approximately 9 dBA. With implementation of these feasible mitigation measures, and based on compliance with the LAMC, construction equipment noise would be mitigated to the greatest extent feasible and would result in equipment noise being reduced to below 75 dBA at 50 feet.

Table 5

<table>
<thead>
<tr>
<th>Noise Source</th>
<th>Noise Level (dBA) /a/</th>
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<tbody>
<tr>
<td></td>
<td>50 Feet</td>
</tr>
<tr>
<td>Backhoe</td>
<td>73.6</td>
</tr>
<tr>
<td>Compressor</td>
<td>73.7</td>
</tr>
<tr>
<td>Concrete Mixer Truck</td>
<td>74.8</td>
</tr>
<tr>
<td>Concrete Pump Truck</td>
<td>74.4</td>
</tr>
<tr>
<td>Concrete Saw</td>
<td>82.6</td>
</tr>
<tr>
<td>Drum Mixer</td>
<td>77.0</td>
</tr>
<tr>
<td>Dump Truck</td>
<td>72.5</td>
</tr>
<tr>
<td>Excavator</td>
<td>76.7</td>
</tr>
<tr>
<td>Front End Loader</td>
<td>75.1</td>
</tr>
<tr>
<td>Generator</td>
<td>77.6</td>
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<tr>
<td>Grader</td>
<td>81.0</td>
</tr>
<tr>
<td>Man Lift</td>
<td>67.7</td>
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<tr>
<td>Tractor</td>
<td>80.0</td>
</tr>
<tr>
<td>Vacuum Street Sweeper</td>
<td>71.6</td>
</tr>
</tbody>
</table>

/a/ Assumes a 6-dBA drop-off rate for noise generated by a point source and traveling over hard surfaces. Actual measured noise levels of the equipment listed in this table were taken at distances of ten and 30 feet from the noise source.

### Issues

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#### Table 6
Typical Outdoor Construction Noise Levels

<table>
<thead>
<tr>
<th>Construction Method</th>
<th>Noise Level at 50 feet (dBA, $L_{eq}$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ground Clearing</td>
<td>84</td>
</tr>
<tr>
<td>Site Preparation</td>
<td>89</td>
</tr>
<tr>
<td>Foundations</td>
<td>78</td>
</tr>
<tr>
<td>Structural</td>
<td>85</td>
</tr>
<tr>
<td>Finishing</td>
<td>89</td>
</tr>
</tbody>
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**Trucks:** In addition to on-site construction activities, noise would be generated off-site by construction-related trucks. The proposed Project would require the export of approximately 1,500 cubic yards of soil resulting in approximately 100 truck trips. It is not anticipated that there would be more than 25 truck trips per day. A doubling of traffic volume is typically needed to audibly increase noise levels along a roadway segment. An additional 25 trucks per day would not double the volume on any roadway segment in the congested downtown Los Angeles area. It is not anticipated that off-site vehicle activity would audibly change average daily noise levels due to the low volume of haul truck trips per day. Therefore, the proposed Project would result in a less than significant impact related to off-site construction noise.

**Operations**

The primary sources of operational noise would be the restaurant facilities and landscaping activities. The restaurant facilities would include a rooftop patio and bar, an upscale restaurant, a café with a food service window to serve outdoor patrons, and an outdoor beer garden. Rooftop access would be available for a bar, dining, a lounge area for restaurant patrons, and a public space. A loading zone would be provided on the north side of the building and Project site for use in routine restaurant operations. Expected hours of operation for the restaurant complex would be Monday through Thursday from 7:00 a.m. to 11:00 p.m. and Friday through Sunday from 8:00 a.m. to 1:00 a.m. In social situations, people often talk at distances of approximately three to 12 feet. A typical very loud voice level at this distance is approximately 66 dBA. A group of 20 people speaking simultaneously, which is a reasonable assumption for the rooftop area, would result in a reference noise level of 79 dBA $L_{eq}$ at six feet. The rooftop area would be approximately 150 feet from the Los Angeles Law Library, and the resulting noise level would be approximately 51.0 dBA $L_{eq}$. This noise level would be well below the existing monitoring noise level of 67.1 dBA $L_{eq}$ and would not result in an audible noise level
**Issues**

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<th>No Impact</th>
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In addition, the Los Angeles Law Library closes most nights by 6:00 p.m. and by 8:00 p.m. on Tuesdays, which is before the noisiest hours for most restaurants and bars. Regarding the Times Mirror Towers project, the rooftop area would be located approximately 280 feet away, and the resulting noise level would be approximately 45.6 dBA \( L_{eq} \). This noise level would be well below the existing monitoring noise level of 69.4 dBA \( L_{eq} \) and would not result in an audible noise level increase. Existing traffic noise would remain the dominant noise source.

The truck loading zone would be located on the northwest side of the Project site and would accommodate one truck at a time. The Project site currently includes a temporary surface parking area and related activity is not known to disturb the Los Angeles Law Library. It is not anticipated that intermittent medium-duty truck activity would be audible at the Los Angeles Law Library beyond existing traffic noise on Broadway.

Furthermore, noise generating park and restaurant activities (e.g., landscaping activities and music) would be regulated by LAMC Section 112.01 (Radios, Television Sets, and Similar Devices), LAMC Section 112.04 (Powered Equipment Intended for Repetitive Use In Residential Areas and Other Machinery, Equipment, and Devices), LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), LAMC Section 115.02 (Amplified Sound Prohibitions and Regulations), and LAMC Section 116.01 (Loud, Unnecessary, and Unusual Noise), which would be enforced through the Los Angeles Police Department. As such, operational noise impacts would be less than significant.

Mitigation Measures NOI-1 through NOI-8 are required as follows:

**Mitigation Measure NOI-1:** Construction equipment shall be properly maintained and equipped with mufflers.

**Mitigation Measure NOI-2:** Grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment.

**Mitigation Measure NOI-3:** Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.

**Mitigation Measure NOI-4:** The public shall be notified in advance of the location and dates of construction hours and activities.

**Mitigation Measure NOI-5:** Construction activities shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. when located within 500 feet of occupied sleeping quarters or other land uses sensitive to noise impacts associated with
Issues

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<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
<th>Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

construction.

**Mitigation Measure NOI-6:** A Noise Disturbance Coordinator shall be established by the construction contractor and responsible for responding to local complaints about construction noise. The Noise Disturbance Coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the Noise Disturbance Coordinator.

**Mitigation Measure NOI-7:** The Noise Disturbance Coordinator shall coordinate with the site administrator of the Los Angeles Law Library to avoid disruptions to normal operations.

**Mitigation Measure NOI-8:** An eight-foot barrier constructed out of manufactured noise attenuating materials (e.g., soundproof panels instead of plywood) shall be erected on the western side of the Project site between the Los Angeles Law Library and construction activities. These barriers shall be capable of reducing noise levels by at least nine decibels as described in the material specification sheet provided by the manufacturer.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?


Comment: A significant impact would occur if the project exposed persons to or generated excessive groundborne vibration or groundborne noise levels.

Vibration levels rarely affect human health, although high levels of vibration may damage buildings. The peak particle velocity is most frequently used to describe vibration impacts to buildings and is measured in inches per second.

Heavy trucks can generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions. As heavy trucks typically operate on major streets, existing ground-borne vibration in the project vicinity is largely related to heavy truck traffic on the surrounding roadway network. Based on field visits, vibration levels from adjacent roadways are not perceptible along the proposed Project.
Construction

Construction activity can generate varying degrees of vibration, depending on the procedure and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.

Vibration levels for various types of construction equipment with an average source level reported in terms of velocity are shown in Table 7. A large bulldozer, which would be used on the Project site, produces a peak particle velocity (PPV) of 0.089 inches per second at 25 feet. The nearest structure to the Project site is located in Grand Park, approximately 40 feet from the edge of the Project site. The vibration level at this distance from a large bulldozer would be approximately 0.04 inches per second, which would be less than the 0.3 inches per second damage criterion. Buildings located across Broadway, Spring Street, and 1st Street are at least 100 feet from construction activity and there is no potential for these buildings to be damaged by the proposed Project.

Table 7
Typical Outdoor Construction Vibration Levels

<table>
<thead>
<tr>
<th>Equipment</th>
<th>PPV at 25 feet (Inches/Second)</th>
<th>Approximate Lv at 25 feet /a/</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Bulldozer</td>
<td>0.089</td>
<td>87</td>
</tr>
<tr>
<td>Loaded Trucks</td>
<td>0.076</td>
<td>86</td>
</tr>
<tr>
<td>Small Bulldozer</td>
<td>0.003</td>
<td>58</td>
</tr>
</tbody>
</table>

/a/ RMS velocity in decibels (VdB) related to 1 micro-inch/second.

Vibration annoyance is another concern related to construction activity. However, perceptible vibration is not typically a concern for human health and is a common occurrence within the urban environment. The Los Angeles Law Library is located approximately 115 feet west of the Project site and may be considered particularly sensitive to vibration annoyance. A large bulldozer produces a vibration level of 87 VdB at 25 feet. The related vibration level at the Los Angeles Law Library would be approximately 60 VdB, which would be below the most stringent annoyance threshold of 65 VdB Buildings for frequent vibration events occurring where vibration
could interfere with interior operations.

In addition to on-site construction activities, construction trucks on the roadway network have the potential to expose vibration-sensitive land uses. Rubber-tired vehicles, including trucks, rarely generate perceptible vibration. It is not anticipated that project-related trucks would generate perceptible vibration adjacent to the roadway network.

The analysis above demonstrates that construction vibration would not damage buildings or annoy sensitive uses. Therefore, the proposed Project would result in a less than significant impact construction vibration.

**Operation**

The primary sources of proposed Project operational-related vibration would include vehicles traveling to the Project site for events and recreational activities. Vehicular movements would generate similar vibration levels as existing traffic conditions. The proposed Project would not introduce any significant stationary sources of vibration, including mechanical equipment that would be perceptible off the Project site, including at the Los Angeles Law Library or the proposed Times Mirror Towers. Therefore, operational activity would result in a less than significant impact related to vibration.

No significant impacts have been identified related to the proposed Project. Therefore, no mitigation measures are required.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?


Comment: A significant impact would occur if the project substantially and permanently increased the ambient noise levels in the project vicinity above levels existing without the proposed Project.

The primary sources of operational noise would be the restaurant facilities and landscaping activities. As discussed above, operational activities would not result in significant permanent increase in noise levels related to these sources. Regarding mobile noise, the proposed Project would generate 992 daily trips, including 95 weekday p.m. peak hour and 121 Saturday mid-day peak hour trips. Roadway segments were selected for analysis based on intersections included in the traffic analysis, proximity to sensitive receptors, and trip distribution. Operational mobile
noise was assessed using the Federal Highway Administration Traffic Noise Model (TNM). Table 8 shows mobile source noise and Table 9 shows changes in mobile noise. Mobile noise would increase by less than 1-dBA at the analyzed segments, which would be less than the 3-dBA audibility standard or any relevant significance threshold. Therefore, the proposed Project would result in a less than significant impact related to operational noise.

Table 8
Estimated Mobile Source Noise Levels

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Estimated dBA, $L_{eq}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spring St. between Temple St. and 1st St.</td>
<td>66.5</td>
</tr>
<tr>
<td>Broadway between Temple St. and 1st St.</td>
<td>68.4</td>
</tr>
<tr>
<td>1st St. between Broadway and Spring St.</td>
<td>70.0</td>
</tr>
</tbody>
</table>


Table 9
Change In Mobile Source Noise Levels

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Estimated dBA, $L_{eq}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spring St. between Temple St. and 1st St.</td>
<td>0.0</td>
</tr>
<tr>
<td>Broadway between Temple St. and 1st St.</td>
<td>0.0</td>
</tr>
<tr>
<td>1st St. between Broadway and Spring St.</td>
<td>0.1</td>
</tr>
</tbody>
</table>


No significant impacts have been identified related to the proposed Project.
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?


Comment: A significant impact would occur if the proposed Project created a substantial temporary increase in the ambient noise levels that would conflict with the noise conditions allowed in the City’s Noise Ordinance.

As discussed in Section 12(a) above, nearby sensitive receptors would experience increased noise levels associated with construction. Construction noise impacts would be temporary in nature, but equipment noise levels would exceed 75 dBA at the Los Angeles Law Library. Therefore, without mitigation, the proposed Project would result in a significant noise impact related to temporary and periodic construction activity.

Based on compliance with the LAMC, construction equipment noise would be mitigated to the greatest extent feasible. The implementation of Mitigation Measures NOI-1 through NOI-8 would reduce noise impacts to a less than significant level.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?


Comment: A significant impact would occur if the proposed Project exposed people residing or working in the project area to excessive noise levels due to the Project site being located within an airport land use plan or within two miles of a public airport where such a plan has not been adopted.

The Project site is not located within an airport land use plan. The Project site is located approximately 12 miles southeast of the Hollywood Burbank Airport, west of the San Gabriel Valley Airport, and north of the Compton/Woodley Airport, respectively. Due to the distance from the nearest airport, the proposed Project would not expose people working or residing in the project area to excessive noise.
Issues

Therefore, no impact would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? ☐ ☐ ☐ ☒


Comment: A significant impact would occur if the proposed Project exposed people residing or working in the project area to excessive noise levels due to the vicinity to a private airstrip.

The Project site is not located near a private airstrip. Therefore, no noise impacts to people working or residing in the Project area would occur.

13. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ☐ ☐ ☒ ☐

Reference: *L.A. CEQA Thresholds Guide* (Section J.1 and J.2); *City of Los Angeles General Plan; Central City Community Plan*

Comment: A significant impact would occur if the proposed Project induced substantial population and housing growth through new development in undeveloped areas or by introducing unplanned infrastructure that was not previously evaluated in the adopted community plan or general plan.

The proposed Project would provide a new park for the existing residents and visitors to the Civic Center neighborhood in downtown Los Angeles in accordance with existing planning goals as discussed in Section 10(b). The proposed Project is not intended to induce development, but instead would provide open space for community enjoyment.

The proposed Project would not directly induce substantial population growth because it does not include a residential or commercial element. No new employees would be hired to maintain and operate the proposed park. Therefore, the proposed Project would not generate any population growth, and the impact would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒
Reference: *L.A. CEQA Thresholds Guide* (Sections J.1 and J.2)

Comment: A significant impact would occur if the proposed Project displaced substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

The Project site does not contain any housing or residential uses. As such, no housing would be displaced or changed as a result of the proposed Project. No impact to housing would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

Reference: Refer to Section 13 (b) above.

Comment: Refer to Section 13 (b) above.

14. PUBLIC SERVICES –

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection? ☐ ☐ ☐ ☒

Reference: *L.A. CEQA Thresholds Guide* (Section K.2); *City of Los Angeles General Plan Safety Element; Los Angeles Fire Department*

Comment: A significant impact would occur if the project required the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

The Project site and surrounding area is currently served by Los Angeles Fire Department Station 3, located at 108 North Fremont Avenue in Los Angeles, approximately 0.47 miles west of the Project site. Station 3 serves the Civic Center/Bunker Hill area. Los Angeles Fire Department Station 4 serves the Little Tokyo/Olvera Street/Chinatown area, and is located 0.52 miles east of the Project site at 450 East Temple Street.

Between January 2018 and May 2018, Station 3 had a response time of 4 minutes 7 seconds and a turn out time of 53 seconds for emergency service calls, and a response time of 3 minutes 55 seconds and a turn out time of 52 seconds for non-emergency service calls.

Between January 2018 and May 2018, Station 4 had a response time of 4...
minutes 11 seconds and a turn out time of 53 seconds for emergency service calls, and a response time of 4 minutes 7 seconds and a turn out time of 53 seconds for non-emergency service calls.

Station 3 and Station 4 both contain the following resources: an assessment engine, a light force engine, a paramedic rescue ambulance, and a basic life support rescue ambulance. Both fire stations would provide adequate fire service coverage.

The proposed Project does not include new housing or non-residential development that would substantially increase the residential or employee populations in the area; thus, the demand for emergency services would not substantially increase. The proposed Project is intended to provide a park facility with a restaurant building complex. As such, the proposed Project would not increase fire hazards or substantially increase the demand for fire protection services. As a part of the design process, the proposed Project would be reviewed by the Los Angeles Fire Department for compliance with fire, life, and safety standards. No impact to fire protection services would occur.

ii) Police protection?

Reference:  L.A. CEQA Thresholds Guide (Section K.1); Los Angeles Police Department

Comment: A significant impact would occur if the proposed Project resulted in an increase in demand for police services that would exceed the capacity of the police department responsible for serving the site.

The nearest station to the Project site is the Los Angeles Police Department Headquarters located at 100 West 1st Street in Los Angeles, which is 0.03 mile to the southeast on the corner of 1st Street and Spring Street (across the street from the Project site). The project area is served by the City of Los Angeles Police Department (LAPD), Central Community Division. The Central Community Police Station is located at 251 East Sixth Street, approximately 0.6 miles southwest of the Project site. Information on the Central Community Area’s number of sworn personnel, number of constituents served, or patrol areas was not readily available.

As previously stated in Section 14 (a)(i), the proposed Project would not directly result in an increase in residential populations or a substantial increase in employee populations. The proposed Project is intended to provide a park facility with a restaurant building complex, and is not expected to generate additional calls for police protection service. As such, implementation and operation of the
Issues

proposed Project would not increase the need for additional police protection services or adversely affect service ratios or response times. No impact to police protection services would occur.

iii) Schools?

Reference: L.A. CEQA Thresholds Guide (Section K.3); Los Angeles Unified School District Local District Map 2015-2016

Comment: A significant impact would occur if the proposed Project included substantial employment or population growth that would generate demand for school facilities that exceeded the capacity of the school district responsible for serving the Project site.

The proposed Project would not provide new housing or substantial additional employment opportunities. The existing site is operated by RAP, and holds special or private events only. The proposed park would not increase the number of permanent employees in the area. Therefore, it would not generate new students or increase the demand on local school systems. Edward R. Roybal Learning Center is located approximately 0.66 miles northwest of the Project site at 1200 Colton Street in Los Angeles. No impact to schools would occur.

iv) Parks?

Reference: L.A. CEQA Thresholds Guide (Section K.4)

Comment: A significant impact would occur if the recreation and park services available could not accommodate the population increase resulting from the implementation of the proposed Project and new or physically altered facilities were needed.

The Project site is currently a vacant lot that is occasionally used for public or private events; however, it is located adjacent and south of the existing Grand Park. Grand Park is owned by the County of Los Angeles, and operated by The Music Center. Activities within the proposed Project and Grand Park would not be coordinated; however, there is the potential for public enjoyment of both spaces at the same time. Activities during construction would be completed in stages to avoid the potential for impacts to Grand Park, and would not include intrusive activities within Grand Park property.

There are additional small parks located around Downtown Los Angeles that would also not be affected by the proposed Project. The proposed Project would add additional open space for use by the public, and would not increase demand for recreation in the area or induce growth.
Therefore, potential impacts to parks would be less than significant.

v) Other public facilities?
Reference: None applicable
Comment: A significant impact would occur if the project resulted in the need for new or altered public facilities, such as libraries, due to population or housing growth.

Construction and operation of the proposed Project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for or use of libraries or other public facilities in the area. Therefore, no impact to other public facilities would occur.

15. RECREATION –

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Reference: L.A. CEQA Thresholds Guide (Section K.4)
Comment: A significant impact would occur if the proposed Project included substantial employment or population growth that generated demand for public park facilities that would exceed the capacity of existing parks or that substantially affected the level or service of existing park facilities.

The proposed Project would develop a 1.96-acre vacant lot into an open space public park including a two-story restaurant building complex located in the Civic Center area of downtown Los Angeles. The proposed Project would be implemented due to the documented need for open and park space in downtown Los Angeles. Additionally, the proposed Project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for parks or other recreational facilities in the area. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?
Reference: LA CEQA Thresholds Guide
Comment: A significant impact would occur if the proposed Project required the construction or expansion of recreational facilities that would have an adverse
The proposed Project would develop a 1.96-acre vacant lot into an open space public park including a two-story restaurant building complex located in the Civic Center area of downtown Los Angeles. The proposed Project would be implemented due to the documented need for open and park space in downtown Los Angeles. Therefore, the proposed Project would increase and improve the recreational services available within the local community. As such, impacts would be less than significant.

16. TRANSPORTATION/TRAFFIC – Would the project:

a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

   □ □ ✗ □

Reference:  L.A. CEQA Thresholds Guide (Section L), Traffic Study, KOA Corporation, December 2018 (Appendix F)

Comment: A project would have a significant traffic impact if the traffic volume to roadway capacity ratio was increased.

The study area applied to the proposed Project includes six study intersections within the local area, incorporating routes to and from the project site and potential parking areas. Traffic counts were conducted to reflect existing traffic conditions at the following intersections:

   1. Broadway & Temple Street
   2. Spring Street & Temple Street
   3. Hill Street & 1st Street
   4. Broadway & 1st Street
   5. Spring Street & 1st Street
   6. Judge John Aiso Street/San Pedro Street & 1st Street

Methodology

The transportation and traffic impact analysis is based on the following approach:

Existing Conditions

The analysis of existing traffic conditions provides the basis for the determination of
impacts. The existing conditions analysis examines the baseline conditions of the year 2018 and includes an assessment of the streets, vehicle volumes, and operating conditions of the area roadway network. Existing conditions were determined based on the intersection land configurations and the existing traffic volumes, volume-to-capacity (V/C) ratios and the corresponding levels of service (LOS) for each of the study intersections during the weekday p.m. peak hour and the Saturday mid-day peak hour. Table 10 shows the existing conditions at the study intersections. As shown in Table 10, all of the study intersections currently operate acceptable LOS C or better during both peak hours.

**Table 10**

<table>
<thead>
<tr>
<th>No</th>
<th>Intersection</th>
<th>Saturday Midday Peak Hour</th>
<th>Weekday PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>V/C</td>
<td>LOS</td>
</tr>
<tr>
<td>1</td>
<td>Broadway &amp; Temple Street</td>
<td>0.597</td>
<td>A</td>
</tr>
<tr>
<td>2</td>
<td>Spring Street &amp; Temple Street</td>
<td>0.360</td>
<td>A</td>
</tr>
<tr>
<td>3</td>
<td>Hill Street &amp; 1st Street</td>
<td>0.379</td>
<td>A</td>
</tr>
<tr>
<td>4</td>
<td>Broadway and 1st Street</td>
<td>0.359</td>
<td>A</td>
</tr>
<tr>
<td>5</td>
<td>Spring Street &amp; 1st Street</td>
<td>0.180</td>
<td>A</td>
</tr>
<tr>
<td>6</td>
<td>Judge John Aiso Street/San Pedro Street &amp; 1st Street</td>
<td>0.224</td>
<td>A</td>
</tr>
</tbody>
</table>

Note: LOS = Level of Service; Delay = Vehicle delay in seconds.
Source: KOA Corporation, December 2018.

**Future without Project Conditions**

To define future conditions without the project, ambient traffic volume growth of one percent per year was added to the year-2018 traffic counts to define project-year 2021 conditions, in addition to trips from cumulative projects. A list of planned/pending projects was analyzed, and trip generation and general assignment was computed to provide this cumulative analysis and future baseline volumes. The trip generation of the cumulative projects for the project vicinity are shown in Appendix F. Table 11 shows the future without project conditions at the study intersections. As shown in Table 11, all of the study intersections would continue to operate at acceptable LOS C or better during both peak hours in the future without project condition.
Table 11
Future without Project Peak Hour Intersection LOS

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Saturday Midday Peak Hour</th>
<th>Weekday PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Broadway &amp; Temple Street</td>
<td>0.704 C</td>
<td>0.694 B</td>
</tr>
<tr>
<td>2</td>
<td>Spring Street &amp; Temple Street</td>
<td>0.485 A</td>
<td>0.424 A</td>
</tr>
<tr>
<td>3</td>
<td>Hill Street &amp; 1st Street</td>
<td>0.440 A</td>
<td>0.795 C</td>
</tr>
<tr>
<td>4</td>
<td>Broadway and 1st Street</td>
<td>0.465 A</td>
<td>0.687 B</td>
</tr>
<tr>
<td>5</td>
<td>Spring Street &amp; 1st Street</td>
<td>0.216 A</td>
<td>0.452 A</td>
</tr>
<tr>
<td>6</td>
<td>Judge John Aiso Street/San Pedro Street &amp; 1st Street</td>
<td>0.305 A</td>
<td>0.652 B</td>
</tr>
</tbody>
</table>

Note: V/C = Volume to Capacity ratio; LOS = Level of Service.
Source: KOA Corporation, December 2018.

Existing with Project Conditions

Per the rulings of the Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council and Neighbors for Smart Rail v. Exposition Metro Rail Construction Authority court cases, an existing with project scenario analyzes project impacts under current baseline conditions. The existing with project conditions are analyzed for project operation below.

Future with Project Conditions

This is an analysis of the future study area traffic conditions with Project construction. The traffic volumes for this scenario were derived by adding the project operation year (year 2021) trips to the future baseline traffic volumes estimated in the Future Without Project conditions. The future with project conditions are analyzed for the construction and operation periods below.

Determination of Significant Impacts

All six of the study intersections are signalized. For signalized study intersections, the Los Angeles Department of Transportation (LADOT) has established specific thresholds for project related increases in the volume-to-capacity (V/C) ratio. Table 12 shows the increase in peak hour V/C ratios that would result in significant impacts.
### Issues

#### Table 12

**Significant Traffic Impact Thresholds for Signalized Intersections**

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Final V/C*</th>
<th>LADOT Significance: Project Related V/C Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>&lt; 0.70 – 0.80</td>
<td>Equal to or greater than 0.040</td>
</tr>
<tr>
<td>D</td>
<td>&lt; 0.80 – 0.90</td>
<td>Equal to or greater than 0.020</td>
</tr>
<tr>
<td>E and F</td>
<td>0.90 or more</td>
<td>Equal to or greater than 0.010</td>
</tr>
</tbody>
</table>

Note: Final V/C is the V/C ratio at an intersection, considering impacts from the project, ambient growth, trips from area/cumulative projects, but without proposed Project traffic impact mitigations.

### Construction

**Construction Trip Generation**

Construction of the proposed Project is anticipated to begin in summer 2019 and take approximately 2 years to complete, concluding in summer 2021. It is anticipated based on current project construction planning efforts that inbound haul trucks would travel to the project site using US-101, then travel south on Spring Street to reach the project site. Outbound haul trucks would exit the project site at Broadway and travel north to reach US-101.

It is assumed that a majority of the construction workers would arrive at the construction site by personal vehicles during the a.m. peak hour and all depart during the p.m. peak hour. Round-trip truck trips were divided into an eight hour workday, multiplied by two to create inbound and outbound one-way trips, and then multiplied by 2.5 to provide Passenger Car Equivalent (PCE) volumes due to vehicle size and speed and effect on traffic flow.

Table 13 shows the construction project construction trip generation calculations. It is estimated that the proposed Project would generate a total of 85 daily one-way weekday vehicle trips, including 34 a.m. peak hour trips and 34 p.m. peak hour trips.
Table 13
Construction Trip Generation

<table>
<thead>
<tr>
<th>Trip Generation</th>
<th>Average Daily Trips</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trucks* Emp. Total</td>
<td>In Out In Out</td>
<td>In Out In Out</td>
</tr>
<tr>
<td>Field Personnel</td>
<td>0 60 60 -- -- 30 0 30</td>
<td>-- -- 0 30 0</td>
<td>-- -- 0 30 0</td>
</tr>
<tr>
<td>Construction Truck</td>
<td>25 0 25 2 2 -- --</td>
<td>2 2 2 2 2</td>
<td>-- -- 2 2 2</td>
</tr>
<tr>
<td>Total Trips</td>
<td>25 60 85 2 2 30 0 32</td>
<td>2 2 0 30 2</td>
<td>32 2 32 2</td>
</tr>
</tbody>
</table>

* Truck trips include a Passenger Car Equivalency (PCE) factor of 2.5.

Note: A maximum of 10 daily construction truck round trips would occur during the most intense construction period. Daily totals were multiplied by the PCE factor.

Source: KOA Corporation, December 2018.

Future with Project Construction Conditions

Project construction trips were added to the future conditions analysis to provide a future with project construction impact analysis. Four of the study intersections (1, 2, 4, and 5) were included in the construction analysis, as construction trucks would be utilizing these intersections during the construction period. The other two study intersections (3 and 6) are located adjacent to parking locations that would be used only during operation of the proposed Project. The existing and existing plus project construction traffic V/C and LOS values are provided in Table 14. Traffic impacts created by project construction were determined by comparing the existing conditions to the existing plus project construction traffic conditions.

As shown in Table 14, LADOT thresholds at the study intersections would not be exceeded. Therefore, construction of the proposed Project would result in less than significant traffic impacts in the future with project construction scenario, and no mitigation measures would be required during project construction.
Issues

Table 14
Future with Project Construction Peak Hour Intersection LOS

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Future without Project Construction Conditions</th>
<th>Future with Project Construction Conditions</th>
<th>Change in V/C</th>
<th>Sig. Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>V/C</td>
<td>LOS</td>
<td>V/C</td>
<td>LOS</td>
</tr>
<tr>
<td>1</td>
<td>Broadway &amp; Temple Street</td>
<td>SMD</td>
<td>0.669</td>
<td>B</td>
<td>0.669</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.694</td>
<td>B</td>
<td>0.702</td>
<td>C</td>
</tr>
<tr>
<td>2</td>
<td>Spring Street &amp; Temple</td>
<td>SMD</td>
<td>0.485</td>
<td>A</td>
<td>0.492</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td>Street</td>
<td>WPM</td>
<td>0.424</td>
<td>A</td>
<td>0.424</td>
<td>A</td>
</tr>
<tr>
<td>4</td>
<td>Broadway and 1st Street</td>
<td>SMD</td>
<td>0.652</td>
<td>B</td>
<td>0.652</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.687</td>
<td>B</td>
<td>0.687</td>
<td>B</td>
</tr>
<tr>
<td>5</td>
<td>Spring Street &amp; 1st Street</td>
<td>SMD</td>
<td>0.506</td>
<td>A</td>
<td>0.506</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.452</td>
<td>A</td>
<td>0.452</td>
<td>A</td>
</tr>
</tbody>
</table>

Note: SMD = Saturday Midday Peak Hour; WPM = Weekday PM Peak Hour; V/C = Volume to Capacity ratio; LOS = Level of Service
Source: KOA Corporation, December 2018.

Operation

Project Operation Trip Generation

The project site is close to numerous transit lines, including Metro Rail Red/Purple Line subway service, and Metro, Foothill transit, and other bus lines. Therefore, a 25 percent Transit Trip Credit was applied, as any incremental trip increases resulting from project operation would likely be lessened by the use of area transit services. The traffic trips estimated to be generated by operation of the proposed Project are shown in Table 15. As shown in Table 15, operation of the proposed Project would generate approximately 992 daily trips, including 95 vehicle trips during the weekday pm peak hour (54 inbound trips and 41 outbound trips) and 121 vehicle trips during the Saturday midday peak hour (65 inbound trips and 56 outbound trips).
### Issues

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Units/Size</th>
<th>Daily Total</th>
<th>Weekday PM Peak Hour</th>
<th>Saturday Total</th>
<th>Saturday Midday Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Trip Generation Rates</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Park</td>
<td>acres</td>
<td>0.78</td>
<td>0.11</td>
<td>1.96</td>
<td>0.28</td>
</tr>
<tr>
<td>High-Turnover Restaurant</td>
<td>seats</td>
<td>4.37</td>
<td>0.42</td>
<td>5.60</td>
<td>0.53</td>
</tr>
<tr>
<td><strong>Trip Generation Estimates</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Park</td>
<td>1.96 acres</td>
<td>2</td>
<td></td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>High-Turnover Restaurant</td>
<td>302 seats</td>
<td>1,320</td>
<td>127</td>
<td>1,695</td>
<td>161</td>
</tr>
<tr>
<td><strong>Trips Subtotal</strong></td>
<td></td>
<td>1,322</td>
<td>127</td>
<td>1,695</td>
<td>161</td>
</tr>
<tr>
<td><strong>Trip Credit</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transit Trip Credit (25%)</td>
<td></td>
<td>-331</td>
<td>-32</td>
<td>-424</td>
<td>-40</td>
</tr>
<tr>
<td><strong>Total Trips</strong></td>
<td></td>
<td>992</td>
<td>95</td>
<td>1,271</td>
<td>121</td>
</tr>
</tbody>
</table>

Source: KOA Corporation, December 2018.

### Existing with Project Conditions

Project operational traffic trips were added to the existing baseline traffic conditions (shown in Table 10 above) to determine the existing with project conditions. The existing with project conditions are shown in Table 16. As shown in Table 16, all of the study intersections with continue to operate are LOS C or better in the existing with project conditions scenario. Operation of the proposed Project would not result in significant impact at any of the study intersections under the existing with project conditions during either peak hour period. As such, the impact would be less than significant under the existing with project operation conditions, and no mitigation measures are required.
### Issues

#### Table 16
Existing with Project Operation Peak Hour Intersection LOS

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Existing Conditions</th>
<th>Existing with Project Operation Conditions</th>
<th>Change in V/C</th>
<th>Sig. Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>V/C</td>
<td>LOS</td>
<td>V/C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Broadway &amp; Temple Street</td>
<td>SMD 0.704</td>
<td>C 0.600 A 0.003 No</td>
<td>WPM 0.694 B 0.638 B 0.003 No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Spring Street &amp; Temple Street</td>
<td>SMD 0.485</td>
<td>A 0.364 A 0.004 No</td>
<td>WPM 0.424 A 0.373 A 0.004 No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Hill Street &amp; 1st Street</td>
<td>SMD 0.440</td>
<td>A 0.381 A 0.002 No</td>
<td>WPM 0.795 C 0.741 C 0.002 No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Broadway and 1st Street</td>
<td>SMD 0.465</td>
<td>A 0.362 A 0.003 No</td>
<td>WPM 0.687 B 0.640 B 0.002 No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Spring Street &amp; 1st Street</td>
<td>SMD 0.216</td>
<td>A 0.182 A 0.002 No</td>
<td>WPM 0.452 A 0.421 A 0.005 No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Judge John Aiso Street/San Pedro Street &amp; 1st Street</td>
<td>SMD 0.305</td>
<td>A 0.235 A 0.011 No</td>
<td>WPM 0.652 B 0.568 A 0.006 No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: SMD = Saturday Midday Peak Hour; WPM = Weekday PM Peak Hour; V/C = Volume to Capacity ratio; LOS = Level of Service
Source: KOA Corporation, December 2018.

### Future with Project Conditions

Project operation trips were added to the future without project conditions analysis to provide the future with project operation impact analysis, which is summarized in Table 17. As shown in Table 17, all of the study intersections with continue to operate are LOS C or better in the future with project operation conditions scenario. Operation of the proposed Project would not result in significant impact at any of the study intersections under the future with project conditions during either peak hour period. As such, the impact would be less than significant under the future with project operation conditions, and no mitigation measures are required.
### Issues

#### Potentially Significant Impact

**With Mitigation**

Less Than Significant

**No Impact**

#### Table 17
Future with Project Operation Peak Hour Intersection LOS

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Future without Project Operation Conditions</th>
<th>Future with Project Operation Conditions</th>
<th>Change in V/C</th>
<th>Sig. Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Broadway &amp; Temple Street</td>
<td>SMD</td>
<td>0.704 C</td>
<td>0.707 C</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.694 B</td>
<td>0.699 B</td>
<td>0.005</td>
<td>No</td>
</tr>
<tr>
<td>2</td>
<td>Spring Street &amp; Temple Street</td>
<td>SMD</td>
<td>0.485 A</td>
<td>0.488 A</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.424 A</td>
<td>0.428 A</td>
<td>0.004</td>
<td>No</td>
</tr>
<tr>
<td>3</td>
<td>Hill Street &amp; 1st Street</td>
<td>SMD</td>
<td>0.440 A</td>
<td>0.442 A</td>
<td>0.002</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.795 C</td>
<td>0.798 C</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td>4</td>
<td>Broadway and 1st Street</td>
<td>SMD</td>
<td>0.465 A</td>
<td>0.468 A</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.987 B</td>
<td>0.689 B</td>
<td>0.002</td>
<td>No</td>
</tr>
<tr>
<td>5</td>
<td>Spring Street &amp; 1st Street</td>
<td>SMD</td>
<td>0.216 A</td>
<td>0.219 A</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.452 A</td>
<td>0.456 A</td>
<td>0.004</td>
<td>No</td>
</tr>
<tr>
<td>6</td>
<td>Judge John Aiso Street/San Pedro Street &amp; 1st Street</td>
<td>SMD</td>
<td>0.305 A</td>
<td>0.312 A</td>
<td>0.007</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WPM</td>
<td>0.652 B</td>
<td>0.658 B</td>
<td>0.006</td>
<td>No</td>
</tr>
</tbody>
</table>

Note: SMD = Saturday Midday Peak Hour; WPM = Weekday PM Peak Hour; V/C = Volume to Capacity ratio; LOS = Level of Service

Source: KOA Corporation, December 2018.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Reference: L.A. CEQA Thresholds Guide (Section L); Traffic Study, KOA Corporation, December 2018 (Appendix F)

Comment: A significant impact would occur if the proposed Project conflicted with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

The Congestion Management Program (CMP) for Los Angeles County requires that the traffic impact of individual projects of potential regional significance be analyzed. A specific system of arterial roadways and all freeways comprises the CMP system. In accordance with the CMP Transportation Impact Analysis Guidelines, a traffic impact analysis is conducted for the following scenarios:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the proposed Project would add 50 or more vehicle trips during
Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant</th>
<th>With Mitigation</th>
<th>Less Than Significant</th>
<th>No Impact</th>
</tr>
</thead>
</table>

either the morning or evening weekday peak hours; and

- At CMP mainline freeway monitoring locations where the project would add 150 more trips in either direction during either the morning or evening weekday peak hours.

There are two CMP intersections in the project vicinity, including:

- CMP ID 43 – Alameda Street and Washington Boulevard, approximately 2.35 miles southwest of the project site
- CMP ID 44 – Alvarado Street and Sunset Boulevard, approximately 2.0 miles northwest of the project site

Additionally, there are two CMP freeway segments along I-10 near the project site, including:

- CMP ID 1036 – north of Vignes Street, approximately 0.72 miles northeast of the project site
- CMP ID 1048 – south of US-101, approximately 0.60 miles northwest of the project site

The County of Los Angeles CMP level of significance thresholds are not intended to be applied to construction activities, thus, the estimated construction trips would not contribute to traffic impacts at the CMP monitoring locations. Based on the estimated trip generation during project operation, as shown in Table 15, the proposed Project is not expected to add 50 or more trips per hour at the nearest CMP intersections or 150 or more trips per hour, in either direction, to the I-10 CMP freeway segments. Therefore, no further analysis of potential CMP impacts is required. The impact would be less than significant and mitigation measures are required.

c) Result in a change in air traffic patterns, including either

- an increase in traffic levels or a change in location that ☐ ☐ ☐ ☒ result in substantial safety risks?

Reference: L.A. CEQA Thresholds Guide (Section L; Traffic Study, KOA Corporation, December 2018 (Appendix F)

Comment: A significant impact would occur if the proposed Project resulted in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

The Project site is located approximately 12 miles southeast of the Hollywood Burbank Airport, west of the San Gabriel Valley Airport, and north of the Compton/Woodley Airport, respectively. Neither construction nor operation of the proposed Project would affect air traffic patterns. Therefore, no impact to air traffic
Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant</th>
<th>No Impact</th>
</tr>
</thead>
</table>

patterns would occur.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Reference: L.A. CEQA Thresholds Guide (Section L.5); Draft Traffic Study, KOA Corporation, June 2018 (Appendix F)

Comment: A significant impact would occur if the proposed Project substantially increased road hazards due to a design feature or incompatible uses.

The proposed Project involves the construction and operation of a public park and restaurant. The proposed Project would not substantially increase hazards due to a design feature or incompatible uses. The existing roadways would not be altered and, as discussed in Section 10, Land Use and Planning, the proposed uses are consistent with the existing land use and zoning regulations governing development of the project site. Additionally, the proposed public park and restaurant would serve the existing community and would be located adjacent to the existing Grand Park. Thus, the proposed Project would not introduce an incompatible land use. Therefore, the proposed Project is not expected to generate any hazards from design features that would result in a safety hazard to pedestrians, personnel, visitors, or nearby neighbors. The impact would be less than significant.

e) Result in inadequate emergency access?

Reference: L.A. CEQA Thresholds Guide (Section L.5 and L.8); Los Angeles General Plan Safety Element

Comment: A significant impact would occur if the proposed Project resulted in inadequate emergency access.

Temple Street is designated as “selected disaster routes” in the City of Los Angeles General Plan Safety Element. As part of standard specifications, construction that would disrupt Temple Street would be coordinated with applicable emergency service providers prior to start of construction so that alternative route planning can occur and be implemented if required. In addition, emergency vehicle access would be maintained at all times during construction. Construction and operation of the proposed Project would utilize the existing access areas at the project site. Therefore, the proposed Project would not affect emergency access or result in inadequate emergency access. The impact would be less than significant.

f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?
Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
<th>Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Reference: L.A. CEQA Thresholds Guide (Section L.5); Traffic Study, KOA Corporation, December 2018 (Appendix F)

Comment: A significant impact would occur if the proposed Project substantially impacted adopted policies, plans, or programs supporting alternative transportation.

The Project study area is served by bus transit lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), Antelope Valley Transit Authority, Commerce Municipal Bus lines, Gardena Transit, Foothill Transit, LADOT Dash, LADOT Commuter Express, Montebello Transit, OCTA, Santa Clarita Transit, Santa Monica Big Blue Bus, and Torrance Transit. Pedestrian facilities include sidewalks and crosswalks surrounding the project site. Additionally, a bicycle lane currently exists along Spring Street on the east side of the project site.

Construction

Construction of the proposed Project may require temporary lane closures, which could affect existing transit, pedestrian and bicycle facilities serving the project site. The bus stop on the east side of Broadway, north of 1st Street, is served by multiple Metro bus lines, including five local lines, a limited-stop line, and a Rapid Bus line. The shelter would be remodeled as part of the proposed Project, and temporary closure of the bus stop would be necessary to implement the bus stop improvements. On Spring Street, at the east side of the Project site, there is a striped/buffered bicycle lane with special green striping to denote the lane and traffic conflict points. Project construction activities may necessitate the temporary closure of the bicycle lane along the eastern project site frontage. Additionally, project construction activities may necessitate the temporary closure of sidewalks at the west, south, and/or east frontages of the project site.

Lane closures during construction of the proposed Project would result in temporary impacts to transit, pedestrian, and bicycle facilities. As such, mitigation measure TRA-1, requiring implementation of a Traffic Management Plan, would be required. With implementation of mitigation measure TRA-1, temporary construction impacts would be less than significant.

Mitigation measure TRA-1 would be required as follows:

**Mitigation Measure TRA-1:** Prior to the start of construction, BOE shall coordinate with LADOT to prepare a Traffic Management Plan (TMP), which would include the following aspects:

- The TMP shall be prepared by a registered traffic or civil engineer, as appropriate, based on City of Los Angeles permit guidelines. Methods to inform the public regarding project construction and associated roadway and/or lane closures shall
Issues

be implemented as part of the TMP.

- Additional measures to be incorporated into the TMP to improve traffic flow and ensure bicyclist and pedestrian safety shall include the following:
  - Project phasing, truck routes, construction worker parking areas, worksite truck entrance/exit locations shall be detailed.
  - Truck drivers shall be required to maintain roadway speeds of 25 miles per hour or lower while traveling through the downtown area.
  - Truck drivers shall be reminded on an ongoing basis and required throughout construction activities to pay close attention to traffic laws and pedestrian and bicyclist safety, especially at site construction access points. Use of flagmen shall be required if truck ingress/egress points will overlap with active pedestrian sidewalks or bicycle lanes.
  - Methods for spacing of both inbound and outbound haul truck shall be included to avoid caravanning of trucks on downtown roadways and queuing at intersections.

Operation

Upon completion of construction activities, complete access to all transit, pedestrian, and bicycle facilities would be fully restored. Therefore, operation of the proposed Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. The operational impact would be less than significant.

17. TRIBAL CULTURAL RESOURCE – Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed of eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?

Reference: L.A. CEQA Thresholds Guide (Section M.2)

Comment: A significant impact would occur if the project caused a substantial adverse change in the significance of a tribal cultural resource, as defined in California Public Resources Code Section 21074, and is listed or eligible to be listed on a state or local register.

As discussed in Section 5 (a), five historical resources were identified within the
Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
<th>Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

project APE. Based on the information compiled from previous inventories and new information, the Court of Flags, Los Angeles City Hall, Los Angeles Law Library, Los Angeles Times Building, and the Los Angeles Civic Center Historic District located within the project APE are eligible for listing in the NRHP and CRHR. One resource, Los Angeles City Hall, is also listed as a Los Angeles Historic-Cultural Monument (LAHCM No. 150). However, none of the five historical resources listed above are located within the Project site boundaries, or would be directly impacted by the proposed Project. Therefore, the proposed Project would not result in a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical cultural resources. No impact would occur.

b) A resources determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Reference: L.A. CEQA Thresholds Guide (Sections M.1 and M.2)

Comment: A significant impact would occur if the project caused a substantial adverse change in the significance of a tribal cultural resource, as defined in California Public Resources Code Section 21074, as determined by substantial evidence, and as determined through consultation with a California Native American tribe.

A Sacred Lands File search of the project area completed by the NAHC indicated the presence of a sacred site in the project area, which could potentially be a tribal cultural resource. Moreover, the Project site is culturally sensitive for buried prehistoric and/or historic archaeological resources that could include tribal cultural resources. Native American individuals identified by the NAHC as representatives of California Native American tribes have requested that both archaeological and Native American monitoring be conducted during ground-disturbing activities. Moreover, they have requested ongoing government-to-government consultation throughout the life of the project. No specific tribal cultural resources have been identified, but the project area is identified as being sensitive for tribal cultural resources. During the construction of the proposed Project, unknown tribal cultural resources could potentially be encountered, particularly during ground-disturbing activities. As discussed in Sections 5 (b) and 5 (d) above, Mitigation Measures CULT-1 and CULT-2, which includes archaeological and Native American monitoring of project ground-disturbing activities, would be implemented to ensure that impacts to tribal or Native American cultural resources are less than significant.
18. UTILITIES AND SERVICE SYSTEMS – Would the project:

   a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

   Reference: L.A. CEQA Thresholds Guide (Section M.2)

   Comment: A significant impact would occur if the proposed Project discharged wastewater, which would exceed the regulatory limits established by the Los Angeles Regional Water Quality Control Board.

   The proposed Project includes the construction and operation a new public park and restaurant building complex. Wastewater generated by the proposed Project would be collected and transported through existing local, trunk, and mainline sewers. The quality of wastewater from the proposed Project is expected to be typical and would not exceed wastewater treatment requirements of the RWQCB. Impacts would be less than significant.

   b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

   Reference: L.A. CEQA Thresholds Guide (Sections M.1 and M.2)

   Comment: A significant impact would occur if the proposed Project resulted in the need for new construction or expansion of water or wastewater treatment facilities that could result in an adverse environmental effect that could not be mitigated.

   The proposed Project includes the construction and operation of a new public park and restaurant building complex that would connect to existing water or wastewater treatment facilities only. As such, the proposed Project is not expected to substantially increase the current amount of water used or wastewater generated at the Project site. Impacts would be less than significant.

   c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

   Reference: L.A. CEQA Thresholds Guide (Section M.2)

   Comment: A significant impact would occur if the volume of stormwater runoff from the proposed Project increased to a level exceeding the capacity of the storm drain system serving the Project site.

   The proposed Project would involve the installation of new stormwater and drainage infrastructure within the park. These improvements would route existing storm water
runoff into existing storm drain facilities without increasing the volume or velocity of stormwater runoff. Therefore, the construction and operation of the proposed Project would result in less than significant impacts to the storm drain system.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
Reference:  L.A. CEQA Thresholds Guide (Section M.1)
Comment:  Refer to Sections 17 (a) and 17 (b) above.

e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?
Reference:  L.A. CEQA Thresholds Guide (Section M.2)
Comment:  Refer to Sections 17 (a) and 17 (b) above.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?
Comment:  The management of solid waste in the City involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. A significant impact would occur if the proposed Project resulted in solid waste generation of five tons or more per week.

The City of Los Angeles Bureau of Sanitation (SAN) and private refuse companies manage the collection, transfer, and disposal of municipal solid waste. There are three types of disposal facilities within state; (1) Class III Landfills (Municipal Solid Waste Landfills), (2) Unclassified (Inert) Landfills, and (3) Transformation (waste to energy) Facilities.

Construction of the proposed Project would generate demolition debris during removal of the remaining surface and subsurface structures. Uncontaminated soil may be excavated, stockpiled, redistributed, and reused. Soils that require remediation may be excavated, stabilized, and potentially hauled from the site to a certified disposal facility.

The construction and demolition debris would be recycled whenever possible, or disposed of at an appropriate facility. As demonstrated above and according to the CalRecycle’s SWIS database, there is sufficient inert waste disposal capacity...
available in Los Angeles County to adequately accommodate the anticipated demolition debris. Further, certain landfills accept wastes considered to be beneficial-use materials, such as soil, green waste, and asphalt. Several landfills in the greater Los Angeles area accept excavated soil, including those that otherwise are restricted by ordinances from accepting municipal solid waste generated in the City of Los Angeles. When possible, the waste would be transferred to local yards to minimize traffic disruption as well as the possibility of general spills.

Construction and operation of the proposed Project would comply with the requirements of the California Integrated Waste Management Act of 1989 (Assembly Bill 939), which requires the implementation of aggressive solid waste management programs that focus on diverting waste from being disposed of in landfills (such as source reduction, recycling, and composting). In addition, project construction would incorporate source reduction techniques and recycling measures and maintain a recycling program to divert waste in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance. Therefore, impacts associated with construction debris would result in a less than significant impact on landfill capacity.

Operational solid waste would be minimal and is anticipated to have a less than significant impact on landfill capacity.

g) Comply with federal, state, and local statutes and regulations related to solid waste? □ □ ☒ ☐

Reference: L.A. CEQA Thresholds Guide (Section M.3)

Comment: A significant impact would occur if the proposed Project generated solid waste that was in excess of or was not disposed of in accordance with applicable regulations.

The City of Los Angeles Solid Waste Management Policy Plan (SWMPP) is the long range solid waste management policy plan for the City. The objective of the SWMPP is to reduce at the source or recycle a minimum of 50 percent of the City’s waste and calls for the disposal of the remaining waste in local and possibly remote landfills. While the SWMPP is the long-range solid waste management policy plan for the City, the Source Reduction and Recycling Element (SRRE) is the strategic action policy plan for diverting solid waste from landfills. The source reduction, recycling, composting, special waste, and public education goals are defined by specific programmatic elements including tasks, roles, responsibilities, and an implementation schedule. The SRRE provides solid waste diversion objectives in accordance with the requirement of AB 939. It is updated annually and is based on an ongoing evaluation of programs and waste analysis. Guidance for, and implementation of, the solid waste diversion programs identified in the SRRE are administered by the BOS’s Solid Resources Citywide Recycling Division. The BOS
presently operates other solid waste reduction and recycling programs, such as its Curbside Recycling Program, which was designed to promote source reduction to achieve the goals established by AB 939 and associated City programs (e.g., the SRRE).

As discussed above in Section 17(f), the proposed Project would generate a nominal amount of solid waste. Furthermore, solid waste generated on-site would be disposed of by permitted solid waste haulers to regulated sites that have adequate capacity and are in compliance with all applicable regulations related to solid waste collection and disposal.

Solid waste disposal during construction of and operation of the proposed Project would comply with federal, state, local statutes and regulations related to solid waste. As such, impacts would be less than significant.

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Reference: Preceding analyses

Comment: No plant or animal species listed on any state or federal lists for endangered, threatened or special status species were identified on-site. Nesting birds may use the trees directly adjacent to the Project site. Tree removal would be required to be scheduled to take place outside of breeding bird season, which generally runs from February 15 through September 15 to avoid the take of migratory non-game native bird species protected under the MBTA of 1918 (50 CFR Section 10.13). If tree removal would occur during the breeding season, Mitigation Measure BIO-1 would ensure that no nesting birds protected under the MBTA are significantly affected.

There are no known cultural resources located on-site. However, the area may be culturally-sensitive, and there are known cultural resources within the immediate vicinity; Mitigation Measures CULT-1 through CULT-3 are provided to address the potential discovery of previously unknown archeological or paleontological resources, which reduces potentially significant impacts to less than significant.
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Reference: Preceding analyses

Comment: There are related-projects that would occur within the immediate vicinity of the project area that are being tracked for purposes of understanding potential cumulative traffic impacts. These related projects are listed and evaluated in Checklist item 16, and potential additive traffic impacts are discussed.

Project-level traffic impacts during construction were all less than significant. As a result, construction of the project would not result in a cumulative considerable contribution to a significant cumulative traffic impact to construction.

Operation of the proposed Project would not result in significant impacts because the majority of traffic trips would be generated during the Saturday midday hour and would not overlap with AM or PM peak weekday hours which typically experience the highest traffic volumes. As such, the proposed Project would not result in a cumulative considerable contribution to a significant cumulative traffic impact to operation.

Based on the above, significant cumulative impacts from related-projects are not anticipated in any of the impact categories. The proposed Project is consistent with local and regional land use, air quality, and transportation plans. The development of parkland and open space, as well as the installation of water quality improvements are cumulatively beneficial. In addition, the proposed Project is not expected to make a cumulatively considerable contribution to a significant cumulative impact. The impact is anticipated to be less than significant.

c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Reference: Preceding analyses

Comment: Therefore, the overall project is anticipated to have positive long-term impacts to the environment. Short-term impacts of the project would be temporary and would be reduced by implementation of feasible mitigation measures. No impact is anticipated.
d) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?  

Reference: Preceding analyses  

Comment: With implementation of the mitigation measures the proposed Project is not anticipated to have significant impacts that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, all potentially significant environmental effects associated with the proposed Project can be mitigated to less than significant levels.

V. MITIGATION MEASURES

The following mitigation measures form the foundation of a mitigation monitoring program (MMP) for the proposed Project. CEQA requires public agencies to adopt a reporting or monitoring program for the changes to the project that have been adopted to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). The program must be adopted by the public agency at the time findings are made regarding the project. The State CEQA Guidelines allow public agencies to choose whether its program will monitor mitigation, report on mitigation, or both (14 CCR Section 15097(c)).

The mitigation measures described herein are supplemental to those required as standard procedure for the City and its contractors. The City and its contractors are the parties responsible for: (1) the necessary implementing actions; (2) verifying that the necessary implementing actions are taken; and (3) the primary record documenting the necessary implementing actions.

The mechanisms for verifying that mitigation measures have been implemented include design drawings, project plans and specifications, construction documents intended for use by construction contractors and construction managers, field inspections, field reports, and other periodic or special reports. All records pertaining to this mitigation program will be maintained and made available for inspection by the public in accordance with the City’s records management systems.

**Mitigation Measure BIO-1:** Exterior building improvements shall occur outside of the nesting season (February 15 through September 15). If avoidance of exterior construction work within this time period is not feasible, the following additional measures shall be employed:

- A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are
present within or directly adjacent to the construction zone. All nests found shall be recorded.

- If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, a qualified biologist shall monitor the nest on a weekly basis and the construction activity shall be postponed until the biologist determines that the nest is no longer active.

If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the appropriate resource agency before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.

**Mitigation Measure CULT-1:** A qualified archeological monitor shall be present on-site during all ground-disturbing activities, including, but not limited to, excavation, grading, and installation of utilities. The on-site archeological monitor shall conduct worker training prior to the initiation of ground-disturbing activity in order to inform workers of the types of resources that may be encountered and apprise them of appropriate handling of such resources. If any prehistoric archeological sites are encountered within the project area, consultation with interested Native American parties shall be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. A cultural resources monitoring and mitigation plan (CRMMP) shall be developed in order to outline monitoring protocols. The CRMMP shall identify key personnel and describe coordination, monitoring, and reporting responsibilities. Monitoring shall be completed by, or under the direction of, an archaeologist who meets Secretary of the Interior’s Standards. The archaeological monitor shall have the authority to redirect construction equipment in the event that potential archeological resources are encountered. If archeological resources are encountered, work in the vicinity of the discovery shall halt until appropriate treatment or further investigation of the resource is determined by a qualified archaeologist in accordance with the provisions of CEQA Guidelines Section 15064.5.

**Mitigation Measure CULT-2:** Prior to the start of construction, a Qualified Paleontologist shall be retained to prepare and present a paleontological worker’s environmental awareness program to all earth-moving personnel and their supervisors. The training shall inform construction personnel of the potential for fossil discoveries, types of fossils that may be encountered, and procedures to follow if potential fossils are unearthed at the Project site.

In the event of unanticipated fossil discoveries by construction personnel, work shall be halted within 50 feet of the discovery until the Qualified Paleontologist can evaluate the discovery. If the discovery is determined to be significant, the Qualified Paleontologist shall develop the appropriate plan (e.g., documentation, salvage, fossil preparation and identification, curation, and monitoring) in consultation with the City of Los Angeles RAP and BOE.
Mitigation Measure CULT-3: A trained Native American consultant or consultants shall be engaged to monitor ground-disturbing activities. The consultant or consultants shall be selected from the interested Native American parties who consulted on the project. This monitoring shall occur on an as-needed basis as determined by BOE in consultation with interested tribes, and shall be intended to ensure that Native American concerns are taken into account during the construction process. The Native American consultant shall report findings to BOE or its archaeological consultant, which will disseminate the information to the consulting Native American parties. The Native American parties identified by the NAHC shall be consulted regarding the treatment and final disposition of any materials of Native American origin found during the course of the project, if any, and will assist BOE in determining whether these materials constitute tribal cultural resources.

Mitigation Measure GEO-1: The proposed Project grading and foundation plans and specifications shall implement the recommendations presented in the Geotechnical Investigation Report First and Broadway Park. The proposed Project plans and specifications shall also be reviewed by a qualified Geotechnical Engineer to ensure proper implementation and application of the recommendations.

Mitigation Measure GEO-2: All grading, excavation, and construction of foundations should be performed under the observation and testing of a qualified Geotechnical Engineer during the following stages:

- Site grading;
- Excavation activities;
- Construction of building foundations and footings;
- Any other ground disturbing activities; and
- When any unusual or unexpected geotechnical conditions are encountered.

With implementation of Mitigation Measures GEO-1 and GEO-2, potential impacts related to liquefaction during construction activities associated with the proposed Project would be less than significant. In addition, no impact would occur from the operation of the proposed Project.

Mitigation Measure NOI-1: Construction equipment shall be properly maintained and equipped with mufflers.

Mitigation Measure NOI-2: Grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment.

Mitigation Measure NOI-3: Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.

Mitigation Measure NOI-4: The public shall be notified in advance of the location and dates of construction hours and activities.
Mitigation Measure NOI-5: Construction activities shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. when located within 500 feet of occupied sleeping quarters or other land uses sensitive to noise impacts associated with construction.

Mitigation Measure NOI-6: A Noise Disturbance Coordinator shall be established by the construction contractor and responsible for responding to local complaints about construction noise. The Noise Disturbance Coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the Noise Disturbance Coordinator.

Mitigation Measure NOI-7: The Noise Disturbance Coordinator shall coordinate with the site administrator of the Los Angeles Law Library to avoid disruptions to normal operations.

Mitigation Measure NOI-8: An eight-foot barrier constructed out of manufactured noise attenuating materials (e.g., soundproof panels instead of plywood) shall be erected on the western side of the Project site between the Los Angeles Law Library and construction activities. These barriers shall be capable of reducing noise levels by at least nine decibels as described in the material specification sheet provided by the manufacturer.

Mitigation Measure TRA-1: Prior to the start of construction, BOE shall coordinate with LADOT to prepare a Traffic Management Plan (TMP), which would include the following aspects:

- The TMP shall be prepared by a registered traffic or civil engineer, as appropriate, based on City of Los Angeles permit guidelines. Methods to inform the public regarding project construction and associated roadway and/or lane closures shall be implemented as part of the TMP.

- Additional measures to be incorporated into the TMP to improve traffic flow and ensure bicyclist and pedestrian safety shall include the following:
  - Project phasing, truck routes, construction worker parking areas, worksite truck entrance/exit locations shall be detailed.
  - Truck drivers shall be required to maintain roadway speeds of 25 miles per hour or lower while traveling through the downtown area.
  - Truck drivers shall be reminded on an ongoing basis and required throughout construction activities to pay close attention to traffic laws and pedestrian and bicyclist safety, especially at site construction access points. Use of flagmen shall be required if truck ingress/egress points will overlap with active pedestrian sidewalks or bicycle lanes.
Methods for spacing of both inbound and outbound haul truck shall be included to avoid caravanning of trucks on downtown roadways and queuing at intersections.

VI. PREPARATION AND CONSULTATION

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Talmage Maxwell Jordan, Environmental Specialist II
VII. DETERMINATION - RECOMMENDED ENVIRONMENTAL DOCUMENTATION

A. Summary

The proposed Project would result is significant impacts that can be mitigated to below the thresholds of significance.

B. Recommended Environmental Documentation

On the basis of this initial evaluation, I find that the project could not have a significant effect on the environment, and a Mitigated Negative Declaration should be adopted.

Reviewed by: __________________________
Talmage Maxwell Jordan
Environmental Specialist II

Approved by: __________________________
Maria E. Martin
Environmental Affairs Officer
Environmental Management Group
VIII. REFERENCES


First & Broadway Civic Center Park Project Air Quality Analysis, KOA Corporation, December 2018

Cultural Resources Assessment, AECOM, July 2018

Geotechnical Investigation Report First and Broadway Park, Fugro. March 2018

Noise and Vibration Impact Study, Terry A. Hayes Associates, December 2018

Paleontological Inventory Report 1st and Broadway Civic Center Park Project, Paleo Solutions, July 2018.

Traffic Study, KOA Corporation, December 2018

U.S.C. Title 33, Chapter 26, Sections 101-607.


California Department of Conservation Division of Oil, Gas, & Geothermal Resources Well Finder. Retrieved from: http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx

City of Los Angeles Municipal Code (Chapter IV, Article 1, Section 41.40; City of Los Angeles Municipal Code Section 112.05 of Chapter IX, Article 2)


California Department of Fish and Wildlife California Natural Diversity Database Biogeographic Data Branch. Retrieved from: https://www.wildlife.ca.gov/data/cnndb


*U.S.C. Title 33, Chapter 26, Sections 101-607*

*City of Los Angeles Department of Recreation and Parks Tree Care Manual.* October 2004. Retrieved from: https://www.laparks.org/forest/urban-forest/program


**List of Appendices**

Appendix A  First & Broadway Civic Center Park Air Quality and Greenhouse Gas Analysis Technical Memorandum, 2018

Appendix B  First & Broadway Civic Center Park Project Greenhouse Gas Analysis, 2018

Appendix C  Cultural Resources Assessment, and Paleontological Inventory Report, 2018

Appendix D  Geotechnical Investigation Report First and Broadway Park, and Final Compaction Report

Appendix E  Noise and Vibration Impact Study, Terry A. Hayes Associates, 2018

Appendix F  Traffic Study, KOA Corporation, June 2018
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