



City of Los Angeles

Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



DRAFT ENVIRONMENTAL IMPACT REPORT

WILSHIRE COMMUNITY PLAN AREA

Volume 1 of 2

Museum Square Office Building

Case Number: ENV-2013-194-EIR
State Clearinghouse Number: 2013096882

Project Location: 5757 W. Wilshire Boulevard, Los Angeles, California, 90036

Council District: 4, Tom LaBonge

Project Description: The Proposed Project involves a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure). Following the lot split, the existing surface parking lot would be demolished, allowing for the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to the existing five-level parking structure. The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces. The current zoning across a portion of the Proposed Project Site is not consistent with the proposed use. In order to allow for the Proposed Project, the Project Applicant, along with the request for the granting of a lot split, will seek a zone change to convert the approximately 118,596 sf portion of the parcel which contains a portion of the surface parking lot and the parking structure, from QPB-2 zoning to (Q)C4-2 zoning, a Conditional Use Permit to allow floor area ratio averaging for a unified commercial development in a C zone, and a Variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required for auditorium space.

APPLICANT:

5757 Museum Square LLC

PREPARED BY:

EcoTierra Consulting, Inc.

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Environmental Analysis Section

February 2014

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I. INTRODUCTION & SUMMARY

1. INTRODUCTION

The purpose of this Draft Environmental Impact Report (EIR) is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Museum Square Office Building Project (the “Proposed Project”). The “Project Site” is located at 5757 Wilshire Boulevard on the east side of Curson Avenue between Wilshire Boulevard and 6th Street in the Wilshire Community Plan Area of the City of Los Angeles (the “City”). The Applicant of the Project is 5757 Museum Square LLC, 5757 W. Wilshire Boulevard, Los Angeles, California 90036. A detailed description of the Proposed Project is included in Section II (Project Description) of this EIR.

The Proposed Project will require certain discretionary approvals by the City and other governmental agencies. Therefore, the Proposed Project is subject to environmental review requirements under the California Environmental Quality Act (CEQA).¹ The City of Los Angeles Department of City Planning (the “Department of City Planning”) is the Lead Agency under CEQA for the Proposed Project.

As described in Section 15121 (a) and 15362 of the *State CEQA Guidelines*, an EIR is an informational document that informs public agency decision-makers and the public of any potential significant environmental effects of a project, identifies possible ways to minimize the significant effects, and describes reasonable alternatives to the project. Thus, the purpose of this EIR is to focus the discussion on those potential environmental effects of the Proposed Project that the Lead Agency has determined could be significant. In addition, where applicable, feasible mitigation measures are recommended that could reduce or avoid significant environmental impacts identified for the Proposed Project.

This EIR was prepared in accordance with Section 15151 of the *State CEQA Guidelines*, which defines the standards for EIR adequacy as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a Proposed Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

A. Notice of Preparation

In compliance with Section 21080.4 of the California Public Resources Code, a Notice of Preparation (NOP) was prepared by the Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, identified responsible and trustee agencies, as well as interested parties on May 10, 2013. The NOP for the EIR was circulated for a 30-day review period starting on May 10, 2013, and ending on June 11, 2013. A Scoping Meeting was held on May 22, 2013. The Initial Study attached to the NOP identified those environmental topics for which the Proposed Project could have adverse environmental effects and concluded

¹ *Public Resources Code Sections 21000-21177.*

that an EIR would need to be prepared to document these effects. Written comments were received from agencies and from interested parties during the review period. Refer to Appendix A-1 to this EIR for a copy of the Initial Study and NOP, and refer to Appendix A-2 to this EIR for written comments submitted to the Department of City Planning in response to the NOP.

B. Environmental Issues Assessed in the EIR

Based on a review of environmental issues in the Initial Study by the Department of City Planning, the City determined that implementation of the Proposed Project may, either by itself or in conjunction with past, present, and reasonably foreseeable future development in the vicinity, have significant effects in the following areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazard and Hazardous Materials
- Land Use Planning
- Noise
- Traffic / Transportation

C. Environmental Review Process

This Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 calendar days. All comments or questions about the Draft EIR should be addressed to the following:

Erin Strelch
Planning Assistant, Environmental Unit
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012
Email: Erin.Strelch@lacity.org

After public review of the Draft EIR, a Final EIR will be prepared in response to comments received during the public review period. The Final EIR will be available for public review prior to consideration of certification of the document by the decision-makers.

D. Organization of the EIR

This Draft EIR is organized into eight sections as follows:

Section I (Introduction/Summary): This section provides an introduction to the environmental review process per CEQA, a summary of the project description, areas of controversy, issues to be resolved, alternatives to the Project, and environmental impacts and mitigation measures.

Section II (Project Description): This section provides a complete detailed description of the Project including the project location, objectives, characteristics, and anticipated public agency actions.

Section III (Environmental Setting): This section provides an overview of the study area's environmental setting including a description of existing and surrounding land uses, and a list of related projects in the project area.

Section IV (Environmental Impact Analysis): This section is the primary focus of this EIR. Each environmental issue area contains a discussion of existing conditions for the project area, an assessment and discussion of the significance of impacts associated with the project, an assessment of cumulative impacts, an identification of mitigation measures (where applicable), and a discussion of level of impact significance after mitigation.

Section V (General Impact Categories): This section provides a summary of significant and unavoidable impacts of the Proposed Project and a discussion of potential growth inducing effects of the Proposed Project.

Section VI (Alternatives to the Project): This section includes an assessment of a reasonable range of alternatives to the Proposed Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the Proposed Project and to avoid or substantially lessen any of the significant effects of the Proposed Project.

Section VII (Preparers of the EIR and Persons Consulted): This section presents a list of City agencies and other agencies and consultant team members that contributed to the preparation of this EIR.

Section VIII (Acronyms and Abbreviations): This section provides definitions for all of the acronyms and abbreviations used in this EIR.

2. PROPOSED PROJECT

The Proposed Project involves the demolition of an existing surface parking lot, construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to an existing parking structure in the [Q]C4-2-CDO and QPB-2 zones. The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

3. AREAS OF CONTROVERSY

Concerns raised in comments submitted to the Department of City Planning in response to the NOP and at the Scoping Meeting included the following:

- **Aesthetics (Shade/Shadow)** – Concerns were raised regarding impacts of the height of the Proposed Project causing shade and shadow impacts on nearby residences. Project impacts related to height are addressed in Section IV.B. (Aesthetics).
- **Air Quality** – Concerns were raised regarding potential pollutants and odors that may be generated during construction and operation of the Proposed Project. Project impacts related to pollutant emissions and air quality are addressed in Section IV.C. (Air Quality).
- **Cultural Resources** – Concerns were raised regarding potential impacts to significant archeological and/or paleontological resources during construction of the Proposed Project. Potential Project impacts related to these resources are addressed in Section IV.D. (Cultural Resources).

- **Greenhouse Gas Emissions** – Concerns were raised regarding greenhouse gas emissions that may be generated during construction and operation of the Proposed Project. Project impacts related to greenhouse gas emissions are addressed in Section IV.E. (Greenhouse Gas Emissions).
- **Hazards and Hazardous Materials** – Concerns were raised regarding exposure of neighbors, construction workers and Project occupants to hazardous substances, particularly methane, during construction and operation of the Proposed Project. Project impacts related to hazards and hazardous materials are addressed in Section IV.F. (Hazards and Hazardous Materials).
- **Noise** – Concerns were raised regarding noise that may be generated during construction of the Proposed Project. Project impacts related to noise are addressed in Section IV.H. (Noise).
- **Transportation** – Concerns were raised regarding traffic congestion. Project impacts related to traffic and transit are addressed in Section IV.I. (Traffic/Transportation).

4. ISSUES TO BE RESOLVED

Issues to be resolved include whether or how to mitigate potentially significant environmental impacts of the Proposed Project, and whether one of the alternatives should be approved rather than the Proposed Project.

5. ALTERNATIVES

This EIR considers a range of alternatives to the Proposed Project to allow for informed decision-making in accordance with *State CEQA Guidelines* Section 15126.6. Alternatives to the Proposed Project are identified for the purpose of substantially reducing or avoiding the significant impacts of the Proposed Project.

The alternatives analysis considers two alternatives that were rejected as infeasible and therefore not studied in detail in the EIR. These alternatives were: Alternative 1 - Alternative Site, and Alternative 2 - Subterranean Parking. The alternatives to the Proposed Project that are analyzed in Section VI (Alternatives to the Project) of this EIR include: 3) No Project Alternative; 4) Reduced Project Alternative; and 5) Alternate Project Configuration Alternative.

This EIR concludes that the Proposed Project would result in significant and unavoidable impacts related to the following:

- Shade/Shadow (Project impacts to nearby residential units and open space (parkland))
- Noise (Project impacts to nearby residential units related to construction)
- Transportation (Project impacts at four study intersections related to Project operation)

A. Alternative 3 – No Project Alternative

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project (CEQA Guidelines Section 15126.6(e)(1)). Pursuant to CEQA Guidelines Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved, based on current plans, and consistent with available infrastructure and community services.

In the event the Proposed Project is not approved, it is expected that the Project Site would remain in its current condition and no new development would occur. Under the No Project Alternative, the existing surface parking lot would remain.

The No Project Alternative would avoid all of the significant and unavoidable project-related impacts that would occur under the Proposed Project because no new development would occur under No Project Alternative.

B. Alternative 4 – Reduced Project Alternative

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25% (twenty-five percent). The Alternative would involve the demolition of an existing surface parking lot, the construction of a new 10-story, approximately 190,472 square-foot commercial office building and the addition of one new level of parking (approximately 122,076 square feet) to an existing five-level parking structure, adding a total of 413 net new parking spaces.

Employment under this Alternative would be expected to be slightly lower than the Proposed Project, approximately 666 employees, versus the 873 for the Proposed Project. Further, given the lower building square footage, utility and service systems usage would be slightly lower.

Except as described above, other characteristics (e.g., construction schedule, hours of operation, security features and systems, lighting, and utility connections) are assumed to be generally similar to those of the Proposed Project. In addition, all applicable Project design features and mitigation measures would be implemented under this Alternative.

The potential environmental impacts associated with this alternative are described in Section VI (Alternatives to the Project), and are compared to the significant environmental impacts associated with the Proposed Project.

The Reduced Project Alternative would reduce but not eliminate the significant and unavoidable impacts of the Proposed Project regarding shade and shadow, construction noise and traffic impacts as compared to the Proposed Project.

C. Alternative 5 – Alternate Project Configuration Alternative

Under the Alternative Project Configuration Alternative, the existing surface parking lot would be demolished, approximately 249,500 square feet of new a commercial office space would be constructed and two new levels of parking would be added to the existing five-level parking structure. The new commercial space would be configured such that a 10-story building would be constructed on the site of the existing surface parking lot with additional commercial space constructed over the existing retail/restaurant space connected with at bridge over the existing entry drive that would visually and functionally tie the spaces together. (Refer to Figures VI-2 and VI-3.)

The only discernible difference in the Alternative Project Configuration Alternative from the Proposed Project would be the shorter office tower and new/greater massing over the existing entry way and one-story retail/restaurant spaces. New commercial square footage under the Alternative would be the same as the Proposed Project; square footage for the two new levels of parking would remain the same as the Proposed Project, approximately 162,768 square feet.

The 10-story building will be 162 feet high, with the extension over the retail spaces approximately 76 feet; following the addition, the parking structure will be approximately 72 feet high. The Alternative Project Configuration Alternative, as with the Proposed Project, would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

Except as described above, all other characteristics under this Alternative (e.g., construction schedule, hours of operation, employment, security features and systems, lighting, utility and service systems usage and utility connections) are assumed to be generally similar to those of the Proposed Project. In addition, all applicable Project design features, standard compliance measures and mitigation measures would be implemented under this Alternative.

The Alternative Project Configuration Alternative would reduce but not eliminate the significant and unavoidable impacts of the Proposed Project regarding shade and shadow. The Alternative Project Configuration Alternative would have the same significant and unavoidable impacts related to construction noise and traffic as the Proposed Project.

D. Environmentally Superior Alternative

The No Project Alternative would be environmentally superior to the Proposed Project, as it would avoid all of the significant and unavoidable impacts of the Proposed Project. The No Project Alternative would not meet any of the objectives of the Proposed Project.

In accordance with CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the “No Project” Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the alternatives analysis provided in Section VI of this EIR, the Reduced Project Alternative would be environmentally superior to the Proposed Project. The Reduced Project Alternative would reduce, but not avoid, the significant and unavoidable impact of the Proposed Project regarding aesthetics (shade/shadow) and construction noise (duration). The Reduced Project Alternative would reduce but not eliminate the significant and unavoidable traffic impact (impacts to three intersections as opposed to four intersections) that would occur under the Proposed Project. The Reduced Project Alternative would meet some of the objectives of the Proposed Project, but would not meet the objectives of the Proposed Project related to providing additional office space and parking to serve the needs of the surrounding community.

6. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table I-1 (Summary of Project Impacts, Project Design Features, and Mitigation Measures) summarizes the various Proposed Project impacts associated with the construction and operation of the Proposed Project, as well as Project design features that would be included with implementation of the Proposed Project. Mitigation measures are proposed for significant impacts, and the level of significance after mitigation is also identified.

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
AESTHETICS		
<p>Visual Quality/Views</p> <p>As a result of the building’s architectural design and orientation on the Project Site, the Proposed Project would be effectively integrated into the aesthetics of the Project Site and project area by means of design, architecture, size, massing, and location. Furthermore, the Proposed Project’s location, height, scale, and architectural features are generally compatible with existing and planned development for the Wilshire Community Plan area.</p>	<p>Because the Proposed Project would result in less-than-significant impacts to visual quality/character, no mitigation measures are required. Nonetheless, Project Design Feature AES-1 is included to further reduce impacts and reflect good planning and design practices currently promoted by the City.</p> <p>PDF-AES-1 All open areas not used for buildings, driveways, parking areas, or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the City of Los Angeles Department of Planning.</p>	<p>Impacts related to visual quality and character would be less than significant.</p>
<p>Light and Glare</p> <p>The Proposed Project would have the potential to alter lighting patterns in the area of the Project Site as compared with existing uses. Exterior lighting would be wall mounted or ground mounted and would be directed downward and shielded away from adjacent residential uses. Wall-mounted security lighting would remain lit all night at each entrance and/or exit, but would be designed to prevent glare onto the adjacent residential property. Furthermore, the majority of lighting associated with the Proposed Project would be directed internally to the Project Site itself, away from neighboring land uses. Therefore, interior and exterior lights on the Project Site would not shine directly onto light-sensitive uses, and would not result in light trespass.</p> <p>Existing sources of glare within the Project Site include the reflection off existing residential buildings and their windows. The exterior portions of the proposed building would utilize various non-reflective material designed to minimize the transmission of glare from buildings. In addition, the proposed building would incorporate exterior landscaping, as necessary, to reduce potential glare generated by windows and/or glass panels.</p>	<p>The implementation of Project Design Feature AES-2 would ensure that any new light sources would not create significant lighting impacts on nearby residences. Implementation of Project Design Feature AES-3 would ensure the inclusion of appropriate materials on the exterior of the building.</p> <p>PDF-AES-2 Outdoor lighting shall be designed and installed with downcast shielding, so that the light sources are shielded from adjacent properties and light does not fall on adjacent properties.</p> <p>PDF-AES-3 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and other fabricated wall surfaces designed to minimize glare and reflected heat. At the time of plan check review, building materials shall be reviewed to assure that they do not exceed the reflectivity of standard building materials. If the Applicant should desire to use more reflective</p>	<p>Impacts related to artificial light and glare would be less than significant.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>materials in locations isolated from major thoroughfares, adequate analysis must be presented to the Department of Building and Safety to determine that the building, due to location, would not cause glare impacts on motorists or nearby population.</p> <p>PDF-AES-4 Direct glare from automobile headlights in the parking structure shall be shielded by walls, louvers, landscaping, and/or other similar measures.</p>	
Shade/Shadow	While significant impacts related to shade and shadows have been identified, there are no feasible mitigation measures.	Impacts related to shade and shadow would be significant and unavoidable.
AIR QUALITY		
<p>Consistency with the AQMP It is assumed that the Proposed Project would comply with all SCAQMD rules and regulations that are in effect at the time of development; the project applicant is not requesting any exemptions from the currently adopted or proposed rules. The Proposed Project is also consistent with the existing City of Los Angeles General Plan land use designation for the site (Regional Center Commercial). As such, the increase in office building space with implementation of the Proposed Project is within the level of anticipated development of the site based on the City's General Plan. Therefore, the Proposed Project would not conflict with the 2012 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in the area under the jurisdiction of the SCAQMD.</p>	None required.	Impacts related to Project consistency with the AQMP would be less than significant.
<p>Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations The mass daily emissions generated by project construction and operational activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, construction and operation of the Proposed Project would not violate any air quality standard or</p>	None required.	Impacts related to the violation of air quality standards or substantial contribution to air quality violations would be less than significant.

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
contribute substantially to an existing or projected air quality violation.		
<p>Odors</p> <p>Construction of the Proposed Project would expose soil that is currently overlain by the surface parking lot at the Project Site. This soil may emit a natural petroleum odor until it is resurfaced with the new building foundation and surface parking lot. Any such odors are expected to be low and similar to those that may occur in the unpaved areas of Hancock Park to the west. Project construction activities would be subject to Rule 403 for the control of fugitive dust. These fugitive dust control requirements would also help to reduce the potential for natural odors to be emitted by areas of dry exposed soil.</p> <p>Operational odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Proposed Project involves the construction and operation of a new office building and expanded parking structure, which are not typically associated with odor complaints. As the Proposed Project involves no elements related to industrial projects, no objectionable odors are anticipated.</p>	None required.	Impacts related to construction or operational release of objectionable odors would be less than significant.
<p>Consistency with General Plan Air Quality Element</p> <p>The Proposed Project would be consistent with goals, objectives, and policies set forth in the City’s General Plan Air Quality Element.</p>	None required.	There would be no impacts related to consistency with the General Plan Air Quality Element.
<p>Toxic Air Contaminants</p> <p>The Proposed Project would consist of the development of commercial uses, and would not include any land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, no toxic airborne emissions would result from its implementation. In addition, construction activities associated with the Proposed Project would be typical of other similar commercial developments in the City, and would be subject to the regulations and laws relating to toxic air</p>	None required.	Impacts associated with the release of toxic air contaminants from the Project Site would be less than significant.

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions.		
BIOLOGICAL RESOURCES		
The Project Site is currently developed with a surface parking lot and parking structure, and is located in a heavily urbanized area of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.	None required.	There would be no impacts related to riparian habitat or other sensitive natural communities.
There are no wildlife corridors or native wildlife nursery sites in the project vicinity. Implementation of the Project would not interfere with the movement of any resident or migratory fish or wildlife species or native wildlife nursery sites.	None required.	There would be no impacts related to the movement of any resident or migratory fish or wildlife species or native wildlife nursery sites.
The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.	None required.	There would be no impacts related to any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
<p>Implementation of the Proposed Project may conflict with the federal Migratory Bird Treaty Act and the California Fish and Game Code. The Project Applicant would be required to comply with the existing regulations of the U.S. Fish and Wildlife Service and the CDFW related to protection of nesting birds.</p>	<p>The implementation of Regulatory Compliance Measure RC-BIO-1 would ensure that the Proposed Project is in compliance with the federal Migratory Bird Treaty Act and the California Fish and Game Code.</p> <p>RC-BIO-1 To avoid impacting nesting birds, special status birds and/or raptors, one of the following must be implemented:</p> <ul style="list-style-type: none"> • Conduct vegetation removal and other ground disturbance activities associated with construction during September through January, when birds are not nesting. If feasible, initiate tree removal, vegetation clearing and grading activities prior to the breeding season (generally February 1st through August 31st) and keep disturbance activities constant throughout the spring to prevent birds from establishing nests in surrounding habitat in order to avoid abandonment of eggs or young if nesting establishes prior to construction activities; or • Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction survey no more than 30 days prior to initiation of tree removal or grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the project site). • If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFW and implemented to 	<p>With the implementation of Regulatory Compliance Measure RC-BIO-1, impacts of Proposed Project related to migratory or nesting birds would be less than significant.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>prevent abandonment of the active nest. At a minimum, tree removal and grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 50 feet for songbird nests, 100 feet for special status songbird nests, and 200 to 500 feet for raptor nests, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area.</p> <ul style="list-style-type: none"> • A survey report by the qualified biologist verifying that the young have fledged shall be maintained in the project file, and submitted to the City of Los Angeles upon request. The qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. 	
<p>For the purpose of this environmental review, a project-related significant adverse effect could occur if the project would cause an impact which is inconsistent with local regulations pertaining to biological resources, e.g the City of Los Angeles Protected Tree Ordinance No. 177,404. In addition to the Protected Tree Ordinance, it is the City’s policy that all mature trees (at least eight-inches in diameter at breast height) that are removed at development sites as part of project implementation be replaced at a 1:1 ratio and the removal of any trees in the public right-of-way be approved by the Board of Public</p>	<p>The implementation of Regulatory Compliance Measures BIO-2 and BIO-3 and Mitigation Measures BIO-1 and BIO-2, would ensure that the Project would not conflict with a local policy or ordinance protecting biological resources.</p> <p>RC-BIO-2 Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077.</p> <p>RC-BIO-3 All trees in the public right-of-way shall be provided per</p>	<p>With the implementation of Regulatory Compliance Measures BIO-2 and BIO-3 and Mitigation Measures BIO-1 and BIO-2, the Project would not conflict with a local policy or ordinance protecting biological resources and impacts would be less than</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
Works.	<p>the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.</p> <p>MM-BIO-1 Prior to the issuance of any permit, a Tree Report shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. The required Tree Report shall include the location, size, type, and condition of all existing trees with an eight-inch or greater DBH, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground.</p> <p>MM-BIO-2 All significant (eight-inch or greater DBH, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.</p>	significant.
CULTURAL RESOURCES		
<p>Historical Resources The Project Site has not been listed in a local, state or national historic preservation register, nor has it been determined eligible for historic designation. Further, according to the City of Los Angeles Parcel Profile Report, the Project Site is not located within any Historic Preservation Overlay Zones.</p>	None required.	There would be no impacts related to historic resources.
<p>Archaeological Resources The Proposed Project site is located in an area designated by the City of Los Angeles Planning Department as being an Archeological Survey Area. Therefore there is the potential that unknown archaeological</p>	<p>The implementation Mitigation Measures CUL-1 through Cul-5 would ensure that impacts of the Proposed Project related to archeological resources would be less than significant.</p> <p>MM-CUL-1 The services of an archaeologist shall be</p>	With the implementation of Mitigation Measures MM-CUL-1 through MM-CUL-5, impacts of the Proposed

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
<p>resources may be located below the surface on the Project Site and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant.</p>	<p>secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or an archaeologist who meets the Secretary of the Interior's guidelines and is listed in the Register of Professional Archaeologists, who shall be present to monitor all ground-disturbing activities associated with the Project.</p> <p>MM-CUL-2 Prior to initiation of ground-disturbing activities, the Project Archaeologist shall conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training, which could be held in conjunction with the Project's initial on-site safety meeting and paleontological resources training, shall explain the importance of and legal basis for the protection of significant archaeological resources.</p> <p>MM-CUL-3 In the event that archaeological resources are exposed during ground-disturbing activities, work in the immediate vicinity of the find shall stop until the Project Archaeologist can evaluate the significance of the find. Construction activities may continue in other areas.</p> <p>MM-CUL-4 If the discovered cultural materials are prehistoric in nature or include Native American remains, the Project Archaeologist shall arrange for a Native American monitor to be retained to assist in the identification of the resources or human remains. The Native American monitor shall be retained from a list of suitable candidates from the Native American Heritage Commission.</p> <p>MM-CUL-5 The Archaeologist shall assess the discovered</p>	<p>Project related to archeological resources would be less than significant.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>material(s) and prepare a survey, study, or report evaluating the impact. The Archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating Archaeologist, as contained in the survey, study, or report. Project development activities may resume once copies of the archaeological survey, study or report are submitted to:</p> <p style="padding-left: 40px;">South Central Coastal Information Center Department of Anthropology McCarthy Hall 477 CSU Fullerton 800 North State College Boulevard Fullerton, CA 92834</p> <p>Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.</p>	
<p>Paleontological Resources The Proposed Project site is located nearby an area designated by the City of Los Angeles Planning Department as being Vertebrate Paleontological Resources Site and an Invertebrate Paleontological Resources Sensitivity Area. Paleontological resources could be located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant.</p>	<p>The implementation Mitigation Measures MM-CUL-6 though MM-CUL-10 would ensure that impacts of the Proposed Project related to paleontological resources would be less than significant.</p> <p>MM-CUL-6 The Project Applicant shall identify and engage a qualified paleontologist by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum prior to any ground-disturbing</p>	<p>With the implementation of Mitigation Measures MM-CUL-6 though MM-CUL-10, impacts of the Proposed Project related to paleontological resources would be less than significant.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>activities. The City of Los Angeles Planning Department shall approve the selected paleontologist prior to issuance of the grading permit.</p> <p>MM-CUL-7 The Project Paleontologist shall attend the pre-grading meeting to discuss how to recognize paleontological resources in the soil during grading activities. The prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying or removing sensitive scientific resources, including fossils preserved either as impressions of soft (fleshy) or hard (skeletal) parts, mineralized remains of skeletons, tracks, or burrows, or other trace fossils, coprolites (fossilized excrement), seeds or pollen, and other microfossils from terrestrial, aquatic, or aerial organisms from the Proposed Project Site.</p> <p>MM-CUL-8 If any paleontological materials are encountered during ground-disturbing activities, work in the immediate area shall be halted. The Project Paleontologist shall be called in to assess the resources and evaluate the impact. Any discovery of paleontological resources shall be treated in accordance with Society of Vertebrate Paleontology guidelines for identification, evaluation, disclosure, avoidance or recovery, and curation, as appropriate.</p> <p>MM-CUL-9 The Project Paleontologist shall then prepare a report summarizing the results of the monitoring program including methods of fossil recovery and curation, and a description of the fossils collected and their significance. Copies of the paleontological</p>	

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Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Any recovered fossils and a copy of the report will be deposited in an accredited curation facility.</p> <p>MM-CUL-10 Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological and/or paleontological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.</p>	
<p>Human Remains No known human burials have been identified on the Proposed Project site or within recorded resources located in the vicinity. While it is possible that human remains could be discovered during construction activities, it is highly unlikely due to the previously disturbed nature of the Project Site. Nevertheless, since human remains could be located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant</p>	<p>The implementation Regulatory Compliance Measure CUL-1 would ensure that impacts of the Proposed Project related to unknown human remains would be less than significant.</p> <p>RC-CUL-1 If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> a) Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. M-F) or 323-343-0714 (After Hours, Sat, Sun, and Holidays) b) If the remains are determined to be of Native American descent, the Coroner has 24 hours to 	<p>With the implementation of Regulatory Compliance Measure RC-CUL-1, impacts of the Proposed Project related to unknown human remains would be less than significant.</p>

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Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>notify the Native American Heritage Commission (NAHC).</p> <p>c) The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.</p> <p>d) The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.</p> <p>If the owner does not accept the descendant’s recommendations, the owner or the descendent may request mediation by the NAHC.</p>	
GEOLOGY AND SOILS		
<p>The Project would not expose people to substantial increased risk as a result of geologic hazard, including rupture of a known earthquake fault, strong seismic ground shaking, liquefaction, landslides, subsidence, or expansive soils.</p>	<p>The implementation Mitigation Measure GEO-1 would ensure that impacts of the Proposed Project related to geology and soils would be less than significant.</p> <p>MM-GEO-1 The design and construction of the project shall conform to recommendations of the Geotechnical Report, a qualified structural engineer and all relevant California Building Code and UBC seismic standards as required and approved by the City of Los Angeles Department of Building and Safety.</p>	<p>With the implementation of Mitigation Measure MM-GEO-1, impacts of the Proposed Project related to geology and soils would be less than significant.</p>
GREENHOUSE GAS EMISSIONS		
<p>The Proposed Project would generate greenhouse gas emissions, but would be consistent with applicable plans to reduce greenhouse gas emissions in California.</p>	<p>None required.</p>	<p>Impacts of the Proposed Project related to greenhouse gas emissions would be less than significant.</p>

**Table I-1
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Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
HAZARDS AND HAZARDOUS MATERIALS		
<p>Development of the Proposed Project has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles.</p>	<p>The implementation of Regulatory Compliance Measures RC-HAZ-1 and RC-HAZ-2, and Mitigation Measure MM-HAZ-1, would ensure that impacts of the Proposed Project related to hazards and hazardous materials would be less than significant.</p> <p>RC-HAZ-1 As the Project Site is within a methane zone, prior to the issuance of a building permit, the site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval.</p> <p>RC-HAZ-2 During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.</p> <p>MM-HAZ-1 If any visual or olfactory indication of potentially contaminated soil, groundwater and/or toxic materials is encountered during demolition, excavation, grading or foundation construction activities, activities shall be temporarily halted. The City of Los Angeles and other appropriate agencies shall be contacted for consultation on the appropriate level of mitigation of the contamination (e.g., excavation and disposal, or</p>	<p>With the implementation of the regulatory compliance measures and the mitigation measure, impacts related to hazards and hazardous materials would be less than significant.</p>

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Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	treatment in-situ (in-place)) to be implemented so as so render the site suitable for construction activities to resume.	
HYDROLOGY AND WATER QUALITY		
<p>The Proposed Project would not violate any water quality standards or waste discharge requirements.</p> <p>The Proposed Project would not 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</p> <p>The Proposed Project would not substantially alter the existing drainage pattern of the site or area</p> <p>The Proposed Project would not 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.</p> <p>The Proposed Project would not otherwise substantially degrade water quality.</p> <p>The Proposed Project would not place housing or structures within a 100-year flood hazard area which would impede or redirect flood flows</p> <p>The Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.</p>	None required.	Impacts of the Proposed Project related to hydrology and water quality would be less than significant.
LAND USE PLANNING		
The Project would not divide a community. The Proposed Project would be consistent with applicable plans and policies as outlined in regulatory and guidance documents relevant to land use at the Project Site.	None required.	Impacts of the Proposed Project related to land use would be less than significant.

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Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
NOISE		
<p>Project construction would significantly impact the nearby residential uses surrounding the Development Site.</p> <p>The construction and operational impacts associated with groundborne vibration resulting from the Proposed Project would be less than significant without mitigation.</p> <p>The operational impacts associated with noise resulting from the Proposed Project would be less than significant without mitigation.</p>	<p>The implementation of the Regulatory Compliance Measure RC-NOI-1 through RC-NOI-3 and Mitigation Measures MM-NOI-1 through MM-NOI-5 would reduce construction noise impacts to the maximum extent feasible, in accordance with the City of Los Angeles Noise Ordinance. However, implementation of these measures would not reduce the construction-related noise levels to less than five dBA L_{eq} above the existing daytime noise levels at the nearby residential uses.</p> <p>Regulatory Compliance Measures:</p> <p>RC-NOI-1 Construction Schedule. The proposed Modified Project shall comply with the City of Los Angeles Municipal Code, which limits exterior construction hours to Monday through Friday, 7:00 a.m. to 6:00 p.m., and Saturday from 8:00 a.m. to 6:00 p.m. No construction activities would occur on Sundays or federal holidays.</p> <p>RC-NOI-2 Hauling Activities. Hauling activities shall be limited to the hours of 8:30 a.m. to 4:30 p.m., Monday through Saturday. No hauling would occur on Sundays or federal holidays.</p> <p>RC-NOI-3 Compliance with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574. The proposed Modified Project shall comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574 and any subsequent ordinances that prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.</p> <p>Mitigation Measures:</p> <p>MM-NOI-1 All construction equipment engines shall be properly tuned and muffled according to manufacturers'</p>	<p>Impacts of the Proposed Project related to construction noise would be significant and unavoidable.</p> <p>Impacts of the Proposed Project related to operational noise would be less than significant.</p> <p>Impacts of the Proposed Project related to construction and operational groundborne vibration would be less than significant.</p>

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	<p>specifications. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>MM-NOI-2 Construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.</p> <p>MM-NOI-3 Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. Examples include the use of drills and jackhammers.</p> <p>MM-NOI-4 Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the residential uses within a radius of 200 feet from the Project Site disclosing the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. This notification shall also provide a contact name and phone number for residents to call for construction noise related complaints. All reasonable concerns shall be addressed within 48 hours of receipt.</p> <p>MM-NOI-5 The Project Developer shall install a temporary noise control barrier in the northern area of the office building construction site. The noise control barrier</p>	

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	<p>shall be engineered to reduce construction-related noise levels at the adjacent multi-family residential structure by the maximum amount feasible, with a goal of a reduction of 10 dBA. If feasible, the barrier shall be a similar height to the multi-family residential building to the north of the Project Site. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed in the northern façade of the new office building and paving activities in the office Project Site are complete.</p>	
PUBLIC SERVICES		
<p>Fire Protection The Proposed Project would not require the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.</p>	None required.	Impacts related to fire protection service would be less than significant.
<p>Police Protection The Proposed Project would not require the addition of a new police station or the expansion, consolidation or relocation of an existing facility to maintain service, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles.</p>	None required.	Impacts related to police protection service would be less than significant.
TRANSPORTATION / TRAFFIC		
<p>Project construction would generate traffic from construction worker travel, trucks hauling debris generated by on-site demolition activities, trucks delivering construction materials, and minor, miscellaneous activities.</p>	<p>Although no significant construction traffic impacts are anticipated, the following Project Design Features are recommended during Project construction to maintain pedestrian and vehicular safety, and to avoid substantial inconvenience to pedestrians, motorists, transit service, residents, businesses and driveway access proximate to the project site.</p> <p>PDF-TRA-1. A Construction Staging and Traffic Management Plan</p>	Impacts related to Project construction traffic would be less than significant.

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>(CSTMP) shall be prepared for approval by LADOT and other appropriate agencies, and implemented during Project construction. The CSTMP shall describe the traffic control measures and devices to be implemented for the various construction phases, along with any sidewalk closures, traffic lane closures, temporary walkway installations, K-rail installations, temporary traffic lane modifications, temporary signal modifications, etc. The CSTMP shall also include the name and phone number of a construction project manager who can be reached 24 hours a day regarding construction complaints or emergency situations. In addition, the CSTMP shall take into account and be coordinated with other construction traffic management plans that may be in effect or have been proposed for other projects in the vicinity.</p> <p>PDF-TRA-2. In the event that any portion of the sidewalk along the east side of Curson Avenue between Wilshire Boulevard and 6th Street is closed due to Project construction, appropriate signage shall be installed directing pedestrians to use the sidewalk along the west side of Curson Avenue, and to cross Curson Avenue at the signalized intersections with Wilshire Boulevard and 6th Street.</p> <p>PDF-TRA-3. Construction vehicles, including construction worker vehicles, shall not park on public streets within one-half mile of the project site.</p> <p>PDF-TRA-4. Construction vehicles shall not stage on public streets,</p>	

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>or stage or queue where they interfere with pedestrian or vehicular traffic, or block access to nearby residences or businesses.</p> <p>PDF-TRA-5. One northbound and one southbound travel lane on Curson Avenue between Wilshire Boulevard and 6th Street shall be maintained at all times.</p> <p>PDF-TRA-6. An adequate number of flag persons in adequate number shall be provided to minimize impacts to traffic flow, and to ensure safe access into and out of the project site.</p> <p>PDF-TRA-7. To the extent feasible, the delivery of construction materials shall be scheduled during off-peak traffic periods.</p> <p>PDF-TRA-8. Heavy-duty construction vehicles, except haul trucks, shall arrive at the Museum Square site no sooner than 7:00 AM and depart no later than 6:00 PM.</p> <p>The hours, operation and route for haul trucks shall be determined and approved by the City’s Department of Building and Safety.</p>	
<p>Out of the 24 intersections studies, the Proposed Project is expected to result in significant impacts to the five study intersections under Future conditions, prior to mitigation:</p> <ul style="list-style-type: none"> 6. Fairfax Avenue / Wilshire Boulevard (PM peak hour) 9. Curson Avenue / Wilshire Boulevard (AM peak hour) 11. Masselin Avenue / Wilshire Boulevard (PM peak hour) 13. Hauser Boulevard / Wilshire Boulevard (PM peak hour) 19. La Brea Avenue / Wilshire Boulevard (AM and PM peak hours) 	<p>Mitigation Measures are not considered feasible at four of the five impacted study intersections. However, some impacts can be mitigated through the implementation of the following regulatory compliance and mitigation measures:</p> <p>Regulatory Compliance Measure:</p> <p>RC-TRA-1 The Proposed Project shall comply with the provisions of the City’s Transportation Demand Management Ordinance No. 168,700 in order to reduce the number of vehicle trips generated by the Proposed Project.</p>	<p>Impacts of the Proposed Project related to traffic and transportation at four of the study intersections would be significant and unavoidable.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>The Applicant shall record a Covenant and Agreement to ensure compliance with the provisions of the Transportation Demand Management Ordinance. The Applicant shall develop and implement a Transportation Demand Management (TDM) Plan that satisfies standard requirements of the Transportation Demand Management Ordinance and offers additional strategies to reduce the amount of vehicle trips generated by the Proposed Project. A preliminary TDM Plan shall be prepared and provided for LADOT review prior to the issuance of the first building permit and a final TDM Plan approved by LADOT is required prior to the issuance of the first certificate of occupancy. The TDM Plan should include, but not be limited to, the following strategies:</p> <ul style="list-style-type: none"> • Flexible/alternative work schedules and telecommuting programs; • Bicycle and pedestrian-friendly environment; • Bicycle amenities such as easily accessible racks and showers available for employee use; • Provision of partially or fully subsidized transit passes offered to site employees; • Transportation information center, which would provide a centrally-located commuter information center that allows employees to obtain information on ridesharing, telecommuting, transit schedules, bicycle plans, etc.; • Transportation Management Coordination Program with an on-site transportation coordinator; 	

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<ul style="list-style-type: none"> • Guaranteed ride home for all employees that carpool, vanpool, or take transit to work; • Provide carpool and vanpool opportunities and financial incentives; • Pursuant to Internal Revenue Code Section 132(f), arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees; • Parking strategies, including compliance with the State parking cash-out law and unbundling the Site’s parking spaces. • Administrative support for the formation of carpools/vanpools; • Provision of car-share amenities on-site to potentially incorporate into the City’s future Integrated Mobility Hubs project (a shared bike and car program planned within transit-rich areas scheduled for implementation in 2016); • Self-service bicycle repair area and shared tools for employees; • Bike and walk to work promotions; • Preferential rideshare loading/unloading or parking location; and • Financial contribution of a one-time fixed-fee in the amount of \$100,000 to the City’s Bicycle Plan Trust Fund (funds would be used by LADOT, in coordination with the affected Council Office and the Department of City Planning, to implement strategies identified in the 2010 Bicycle Plan within 	

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p align="center">the project study area).</p> <p>Mitigation Measure: MM-TRA-1 The Project will implement the restriping of the south leg of Masselin Avenue to provide an exclusive left-turn lane for the northbound approach. The sidewalk and curb return at the northwest corner of the intersection will require minor reconstruction, and the traffic signal equipment will be modified as necessary.</p>	
<p><i>Congestion Management Program (CMP) Impact Analysis</i> It is estimated that the Proposed Project would contribute no more than 23 directional trips to any freeway segment during either peak hour. This Project contribution is well below the 150 directional-trip threshold.</p>	<p>None required.</p>	<p>Impacts related to the Congestion Management Program would be less than significant.</p>
<p>UTILITIES AND SERVICE SYSTEMS</p>		
<p>Wastewater/ Sewer The Proposed Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. The Proposed Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.</p>	<p>None Required.</p>	<p>Impacts related to wastewater and sewer service would be less than significant.</p>
<p>Stormwater The Proposed Project would not 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.</p>	<p>None Required.</p>	<p>Impacts related to stormwater drainage would be less than significant.</p>
<p>Water The Proposed Project would not have a potentially significant impact on water supplies available to serve the Project from existing entitlements and resources. Department of Water and Power’s most current water management plan indicates that a sufficient water supply is expected to be available to serve the Proposed Project. Sufficient water supplies</p>	<p>The Proposed Project would implement the following Regulatory Compliance Measures to reduce water consumption: Regulatory Compliance Measures: RC-UTIL-1 The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the</p>	<p>Impacts related to water service would be less than significant.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
<p>would be available to serve the Proposed Project from existing entitlements and resources, therefore, new or expanded entitlements will not be necessary.</p>	<p>Proposed Project, and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.</p> <p>RC-UTIL-2 The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p>RC-UTIL-3 In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:</p> <ul style="list-style-type: none"> • Weather-based irrigation controller with rain shutoff • Matched precipitation (flow) rates for sprinkler heads • Drip/microspray/subsurface irrigation where appropriate • Minimum irrigation system distribution uniformity 	

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p align="center">of 75 percent</p> <ul style="list-style-type: none"> • Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials • Use of landscape contouring to minimize precipitation runoff <p>RC-UTIL-4 If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.</p> <p>RC-UTIL-5 Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.</p> <p>RC-UTIL-6 Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.</p> <p>RC-UTIL-7 A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.</p> <p>RC-UTIL-8 Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)</p> <p>RC-UTIL-9 Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.</p>	

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	<p>RC-UTIL-10 Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.</p>	
<p>Solid Waste The Proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project’s solid waste disposal needs. The Proposed Project would comply with federal, state, and local statutes and regulations related to solid waste.</p>	<p>The Proposed Project would implement the following Regulatory Compliance Measures to reduce impacts from solid waste:</p> <p>Construction</p> <p>RC-UTIL-11 Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the LADBS. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction related wastes.</p> <p>RC-UTIL-12 To facilitate on-site separation and recycling of demolition and construction related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the Proposed Project’s regular solid waste disposal program.</p> <p>Operation</p> <p>RC-UTIL-13 In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project’s regular solid waste disposal program. The Project Applicant shall only contract for</p>	<p>Impacts related to solid waste generation would be less than significant.</p>

**Table I-1
Summary of Project Impacts, Regulatory Compliance Measures, Project Design Features, and Mitigation Measures**

Environmental Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Impact After Mitigation
	waste disposal services with a company that recycles solid waste in compliance with AB341.	

II. PROJECT DESCRIPTION

1. PROJECT APPLICANT

The Applicant for the Museum Square Office Building Project (the Proposed Project) is 5757 Museum Square LLC, located at 5757 W. Wilshire Boulevard, Los Angeles, CA 90036.

2. PROJECT LOCATION

A. Project Site

The Museum Square site address is generally listed as 5757 Wilshire Boulevard. However, it should be noted that per the City of Los Angeles Department of Planning, Zone Information and Map Access System (ZIMAS), the site includes all of the following addresses: 5779 Wilshire Boulevard, 5775 Wilshire Boulevard, 5761 Wilshire Boulevard, 5757 Wilshire Boulevard, 5759 Wilshire Boulevard, 5765 Wilshire Boulevard, 5771 Wilshire Boulevard, 5767 Wilshire Boulevard, 5773 Wilshire Boulevard, 5769 Wilshire Boulevard, and 5711 Wilshire Boulevard.¹ The full Museum Square site is a rectangular shaped property that is approximately 7-1/2 acres (327,613 square feet); it is fully developed with a commercial office complex, an associated surface parking lot, and a five-story parking structure. The full site is bounded by Wilshire Boulevard to the south, Curson Avenue to the west, Masselin Avenue to the east and multi-family residential development to the north. The northwest corner of the parcel, approximately 25,852 square feet along Curson Avenue that would be redeveloped under the Proposed Project is currently in use as a surface parking lot, a fenced trash enclosure area and the parking structure. No structures are located on the portion of the site proposed for development of the new office building.

The Santa Monica Freeway (Interstate 10), located approximately two miles south of the Museum Square site, provides regional access to the Project area. Additional nearby arterials contributing to site access include 6th Street, 3rd Street and Beverly Boulevard to the north, Hauser Boulevard and S. La Brea Avenue to the east, Wilshire Boulevard, Olympic Boulevard and San Vicente Boulevard to the south, and Fairfax Avenue and Crescent Heights Boulevard to the west. Several public transit services run adjacent to the Museum Square site, including several Los Angeles County Metropolitan Transportation Authority (Metro) bus routes, and a City of Los Angeles Department of Transportation (DOT) DASH shuttle service route. The nearest Metro rail line (Purple Line) Station is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Museum Square site. Work to bring the Metro Purple Line further west is moving forward, with plans approved to add nine miles of subway, in three Planned (Section 1) and Forecasted (Sections 2 and 3) Schedules. Under the currently Planned Schedule for Section 1, an additional 3.9 miles will be added to the line along with three new Metro Purple Line Stations at the intersections of Wilshire Boulevard and La Brea Avenue, Wilshire Boulevard and Fairfax Avenue, and Wilshire Boulevard and La Cienega Boulevard. Metro anticipates that a Full Funding Grant Agreement for Section 1 of the subway extension will be executed with the Federal Transit Administration (FTA) in early 2014. With the local funds provided by Measure R, this should

¹ *City of Los Angeles Department of Planning, Zone Information and Map Access System, 5757 W. Wilshire Blvd (et al). Website: <http://zimas.lacity.org/>, accessed November 28, 2012.*

provide sufficient funds to begin construction of Section 1 of the extension.² Two new Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue (approximately 0.7 mile (eight blocks, 3,696 feet)) east of the Museum Square site) and Wilshire Boulevard and Fairfax Avenue (approximately 1/3 of a mile (one long block - 1,850 feet) west of the Museum Square site). Figure II-1 (Regional and Project Vicinity Map), depicts the location of the Museum Square site and Figure II-2 (Aerial View of the Museum Square site) depicts an aerial photograph of the project area.

As previously discussed, the Museum Square site is fully developed with an 11-story, approximately 530,000 square foot (sf) commercial office complex, an associated surface parking lot and a five-story parking structure. The existing building complex is located on the southern approximately one-half of the lot with a surface parking area and parking structure located on the northern half of the lot. The existing office building complex was originally constructed in 1948 as the Prudential Insurance Company Building. However, substantial renovations and improvements have been made to the building since that time and due to the extent of these changes, the building has not been listed in a local, state or national historic preservation register, nor has it been determined eligible for historic designation.³ The existing parking structure was approved and constructed in 1983. There are 50 trees with a trunk diameter greater than eight inches (8") in diameter at breast height (DBH) located in the area of the Museum Square site that will be redeveloped; all of the trees are ornamental/non-native species. An approximately 12 foot high hedgerow of Indian Laurel Fig (*Ficus retusa nitida*) currently screens the surface parking lot from view along Curson Avenue. There are two Jacarandas (*Jacaranda mimosifolia*) planted as street trees in the parkway along Curson Avenue in front of the surface parking lot area to be redeveloped. The topography of the Museum Square site is relatively flat, with a gradual slope from the north to the south.

B. Surrounding Land Uses

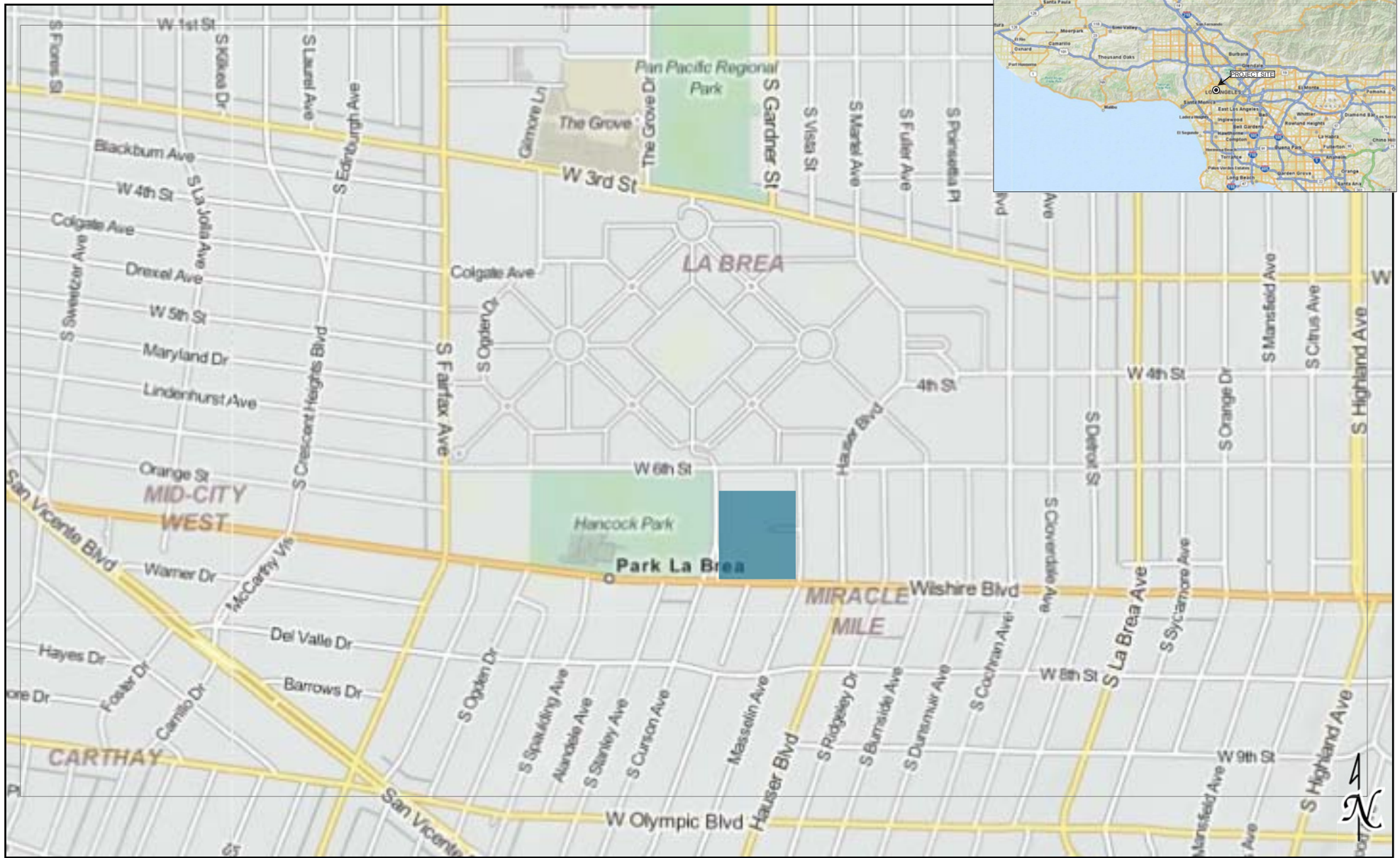
The Museum Square site is located on a heavily trafficked segment of Wilshire Boulevard in the Miracle Mile area of the City west of downtown Los Angeles and Mid-City. The land uses within the general vicinity of the Museum Square site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction.

The area immediately surrounding the Museum Square site is developed with a mix of multi-family residential, commercial, retail and institutional buildings with associated parking structures and surface parking lots, of varying architectural style and dates of construction. Sharing the block and to the immediate north of the Museum Square site are the five-story Museum Terrace Apartments building (600 S. Curson Avenue) and the five-story Masselin Park West apartment building (5700 W. 6th Street). To the north of that, across W. 6th Street, is the 160 acre, Park La Brea residential development which includes 18 Art Deco style apartment towers, along with numerous Modern Colonial style low-rise townhouse and garden apartment buildings, providing over 4,000 residences and affiliated on-site amenities. Sharing the parcel and to the south of the redevelopment site, fronting along Wilshire Boulevard, is the existing 11-story, approximately 530,000 sf Museum Square Office building complex, which includes office, banking, concierge, conferencing facility, convenience store, dry cleaning and

² *Metro Purple Line Extension Frequently Asked Questions website: <http://www.metro.net/projects/westside/>, accessed January 3, 2014.*

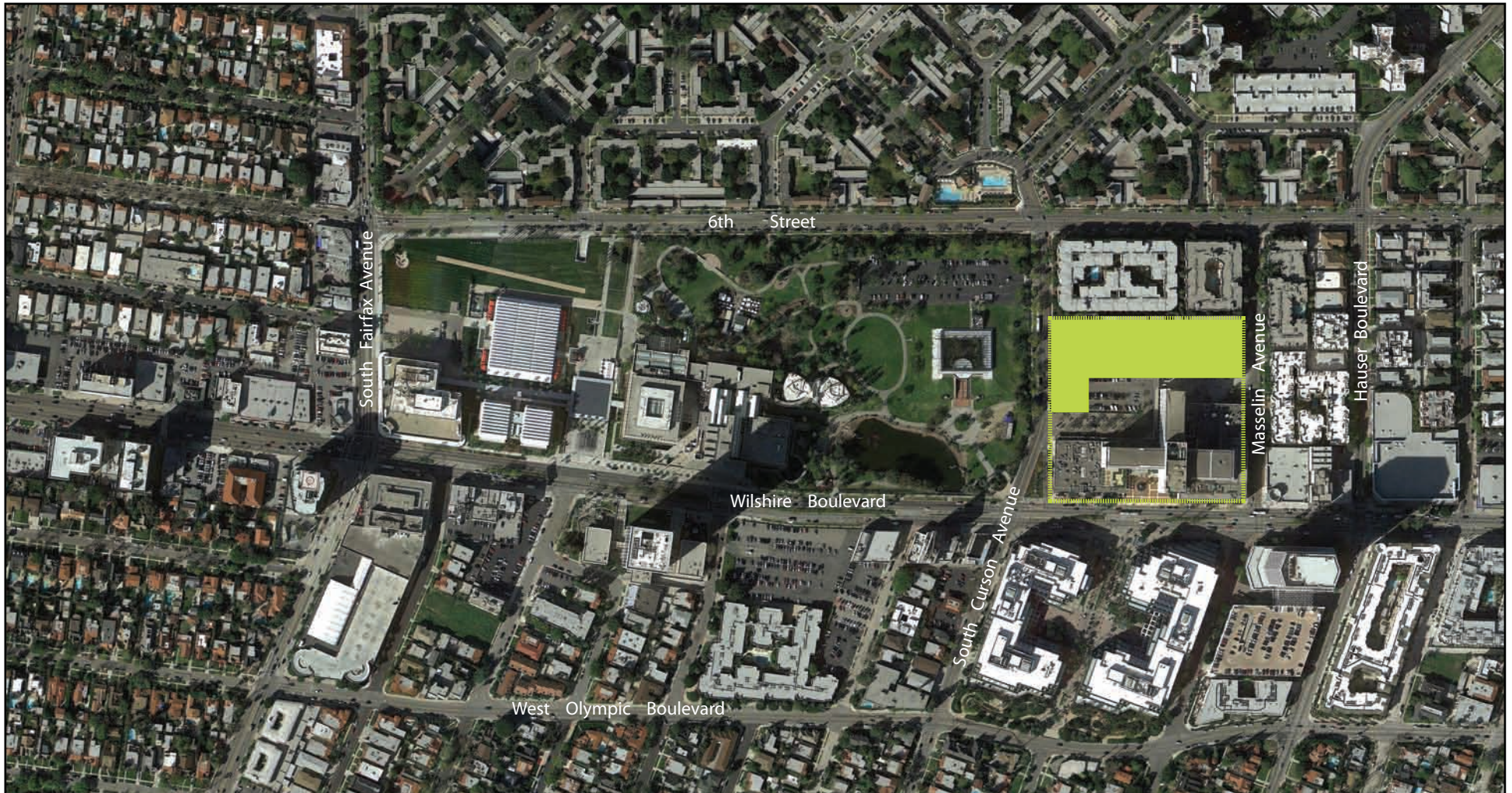
³ *ZIMAS op. cit.*

restaurant (including Callender's Grill, Mixt Greens, Baja Fresh, Johnnies New York Pizza and The Counter Burger) uses. Across Wilshire Boulevard, south of the Museum Square site, is the Wilshire Courtyard complex (5700 and 5750 Wilshire Boulevard), comprised of two six-story commercial office buildings linked by a central drive and park-like open spaces. Directly east of the Museum Square site (across Masselin Avenue) are a two-story commercial retail building housing an Office Depot store and two five-story, multi-family residential developments; Renaissance Apartment Homes located at 630 Masselin Avenue and Tiffany Court Apartment Homes, located at 616 Masselin Avenue.



 Project Site

Source: MapQuest, December 2012.



 Project Site

Source: Jerde, December 2012.

West of the Museum Square site is Hancock Park and the George C. Page Museum, which is part of the Natural History Museum of Los Angeles County and includes the La Brea Tar Pits and associated paleontological sites. The 20-acre, seven building campus of the Los Angeles County Museum of Art (LACMA) is located to the west of this facility.

C. Land Use Plans/Zoning

The Museum Square site is located in the Wilshire Community Plan Area of the City of Los Angeles at 5757 Wilshire Boulevard (see Figure II-1, Regional Vicinity and Project Location). The Museum Square site is located within the Miracle Mile Community Design Overlay (CDO) area. The Museum Square site contains two zoning designations: [Q]C4-2-CDO (Commercial Zone) and QPB-2 (Parking Building Zone). The General Plan land use designation for the Museum Square site is 'Regional Center Commercial'.

3. PROJECT CHARACTERISTICS

The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot (refer to Figure II-3, Parcel Survey Map). The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building (refer to Figure II-4, Proposed New Parcel Map). Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to the existing five-level parking.

The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

While building plans are still in the preliminary phase, in order to minimize excavation in a sensitive cultural resource area and a methane zone, the foundation system for the new office building will most likely consist of a mat footing supporting the core of the building, which is the central area of the building housing the elevators, stairwells, electrical and climate control equipment, restrooms, and other facilities. The mat footing will require excavation to a depth of approximately six to eight feet, and would match the footprint of the core of the building, approximately 2,700 sf (13.4%) of the total building footprint of approximately 20,010 sf (refer to Figure II-8, Proposed Floor Plan). The remaining structural elements for the building would consist of approximately 20 perimeter column footings/foundations which would extend to a depth of approximately 2'-6".

A. Design and Architectural Features

The proposed new Museum Square Office Building would be designed in a modern vernacular. The new building would be visible from Hancock Park and the LACMA campus and from distant vistas driving east on 6th Street and Wilshire Boulevard. The glass façade of the new building integrates screening as an element to soften the building face while offering privacy that will benefit both the neighboring residential units and the office tenants. The placement of the new office building would also screen the parking structure from direct view from the LACMA campus/Hancock Park. The service storage and access will be located to the north side of the building, keeping the lobby and the main entrance

separate from the back of house functions. An approximately 68 foot setback on the northern property line and landscaping would serve to provide further privacy enhancement to residents of the Museum Terrace apartment building and to pull the park edge into the Museum Square ground plane (refer to Figures II-3 through II-10).

B. Access and Parking

Access for pedestrians would be from Wilshire Boulevard and Curson Avenue, with vehicle access to the parking structure, for both tenants and visitors, provided along Curson Avenue and Masselin Avenue. Entries and exits from Curson Avenue will be indicated by formal tree canopies marking a clear vehicular circulation path. An additional service lane will be added to the north vehicular entry from Curson Avenue for easy access to the service entry and to ensure adequate ingress and egress for building patrons.

The Applicant will be requesting a variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required for auditorium space. The auditorium is not utilized on a regular basis, but rather is used intermittently and generally at off-peak hours, such that more parking is currently required than needed and more than sufficient parking exists.

C. Zoning

The current zoning across a portion of the Proposed Project Site is not consistent with the proposed use. In order to allow for the Proposed Project, the Project Applicant, along with the request for the granting of a lot split, will seek a zone change to convert the approximately 118,596 sf portion of the parcel which contains a portion of the surface parking lot and the parking structure, from QPB-2 zoning to (Q)C4-2 zoning (refer to Figure II-5, Proposed Zone Change Map). This change will result in the entire Museum Square site being singularly zoned for commercial use.

D. Operations

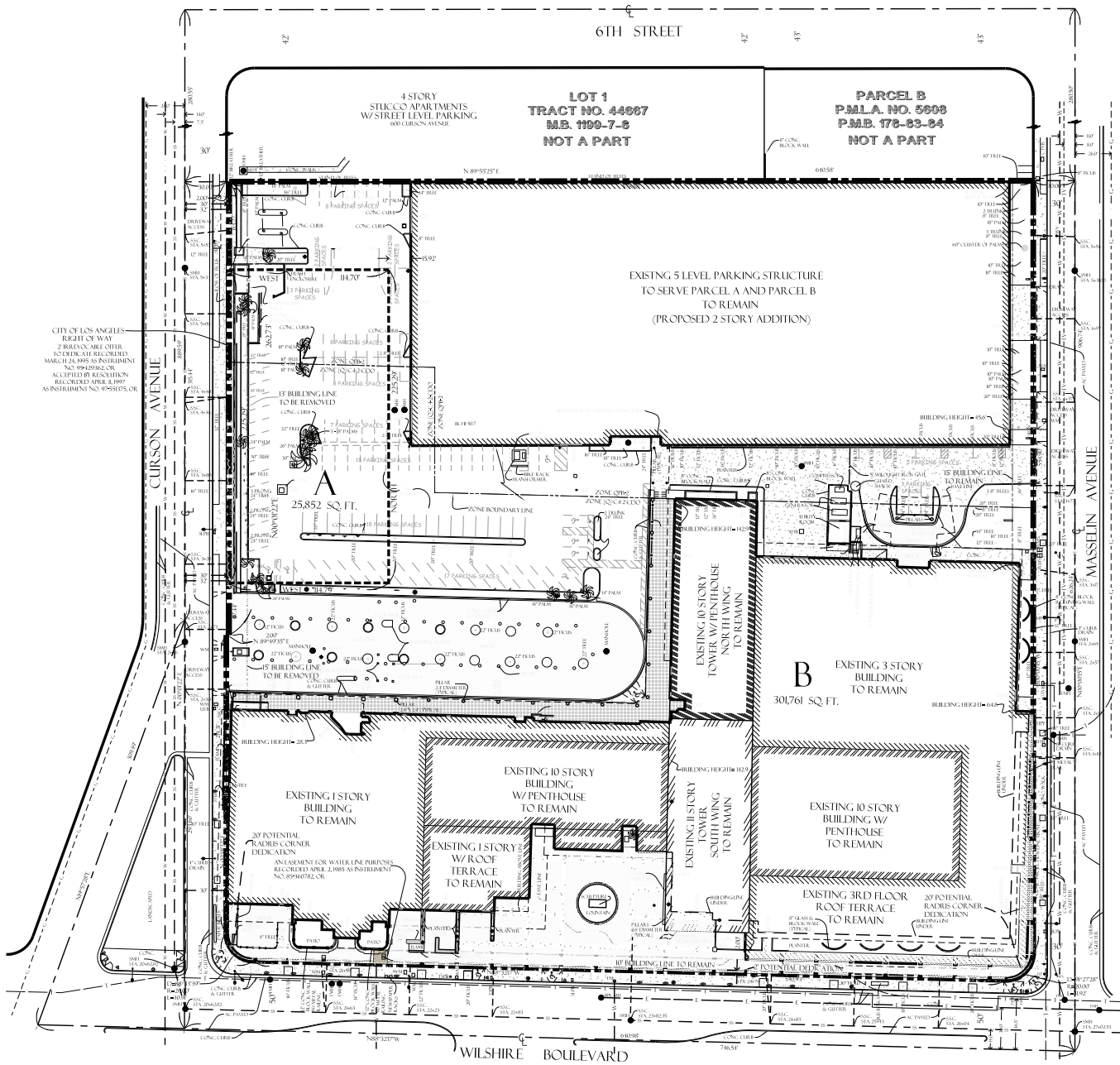
The Proposed Project would accommodate approximately 873 full and part-time employees, primarily from the local community. Cleaning crews and security personnel would routinely be inside the building every weeknight after normal business hours (typically 8 am to 6 pm).

E. Security

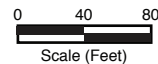
The Proposed Project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments. Closed circuit television (CCTV) cameras would be mounted on the building exterior that would record activity on the property. Similar to current operations in the existing Museum Square office complex, a security/check-in desk would be located in the lobby of the new office building; security personnel would also be present after normal business hours.

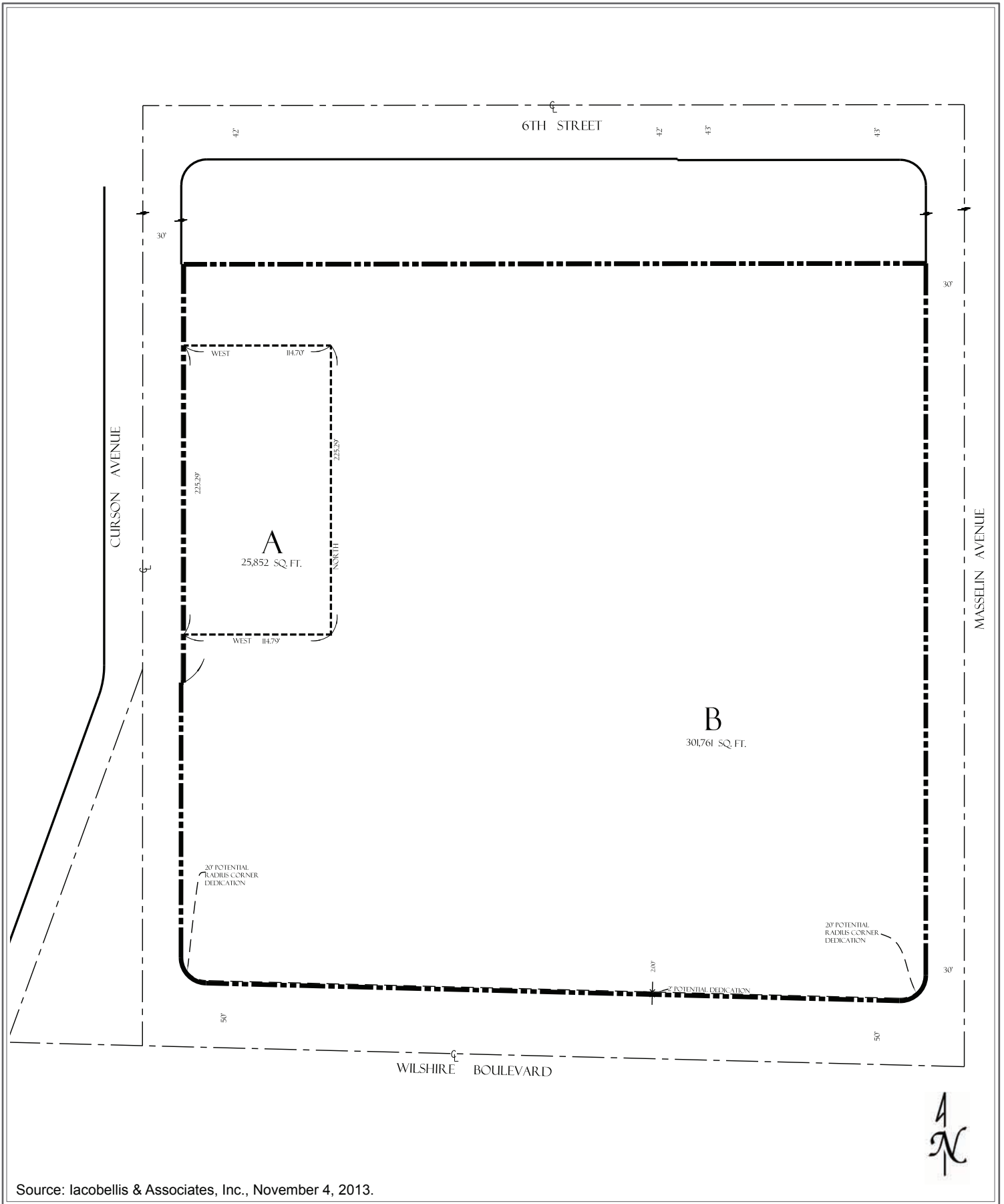
F. Project Signage

Proposed Project building signage would consist of combination of letter and logo signs that would be architecturally integrated into the Project design. The Project would not include any new monument or pylon signs in conjunction with the operation of the Proposed Project, nor would any off-site advertising be included.

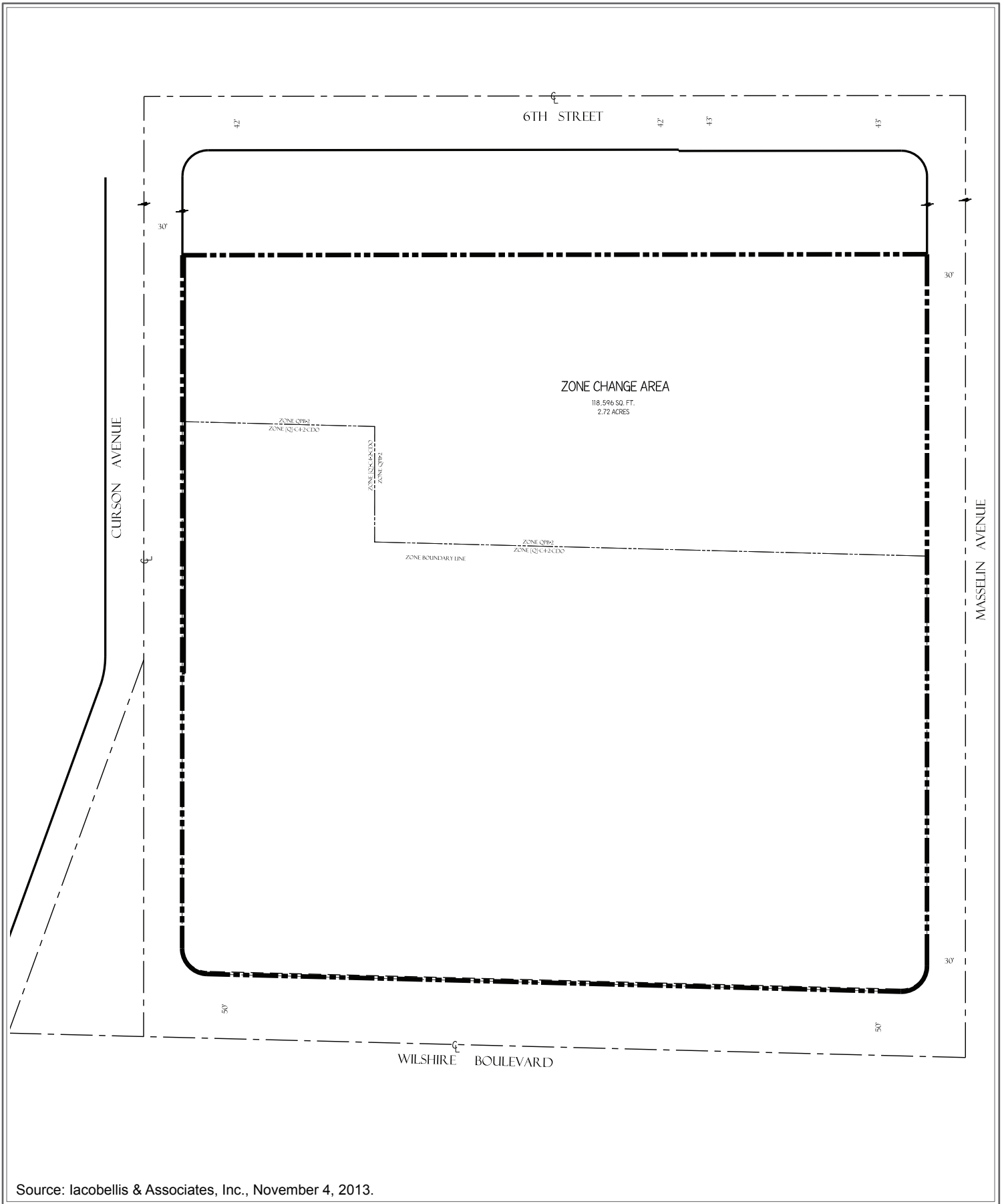


Source: Iacobellis & Associates, Inc., November 7, 2013.





Source: Iacobellis & Associates, Inc., November 4, 2013.



Source: Iacobellis & Associates, Inc., November 4, 2013.

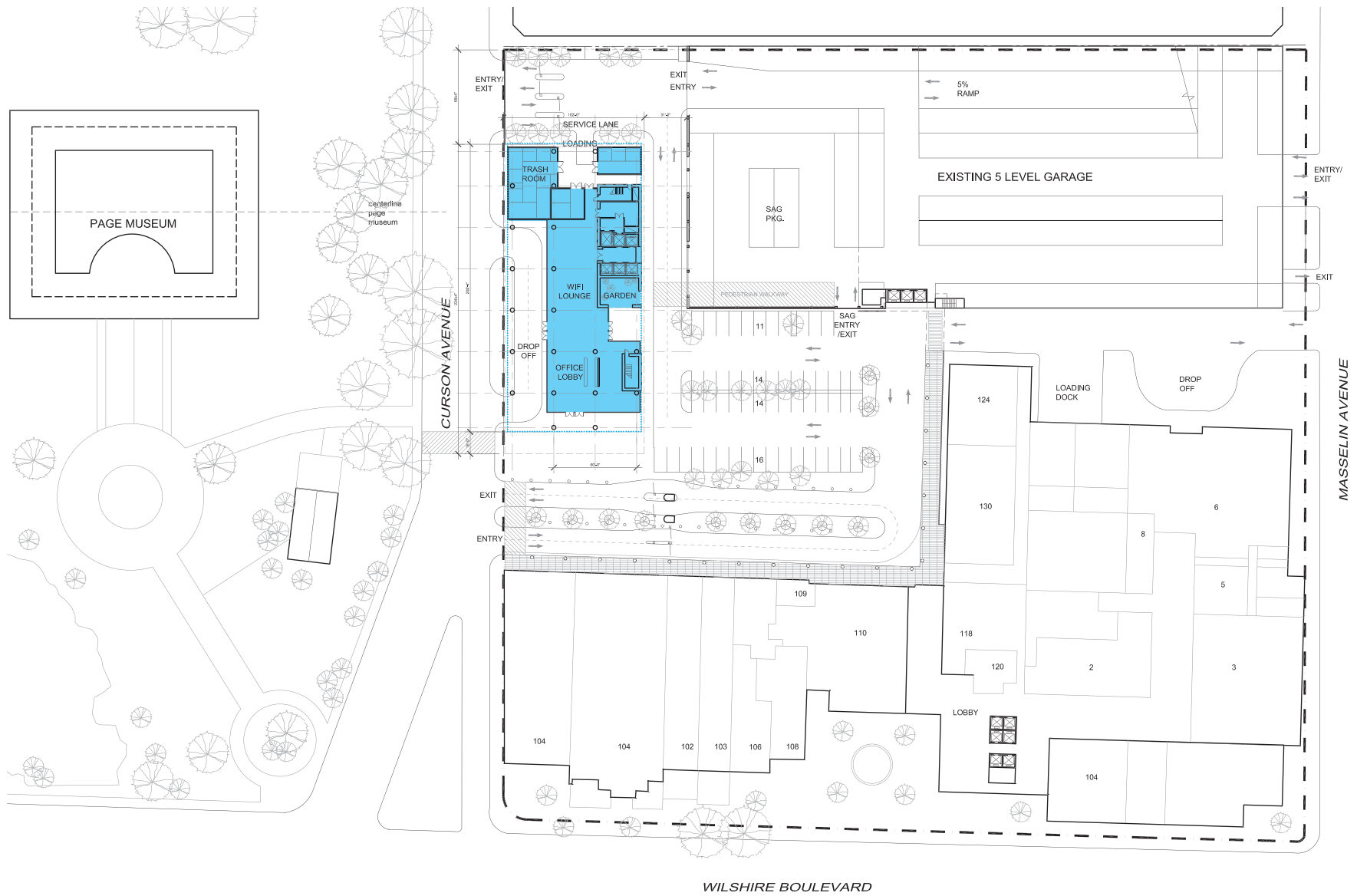


Source: Jerde, January 2013.

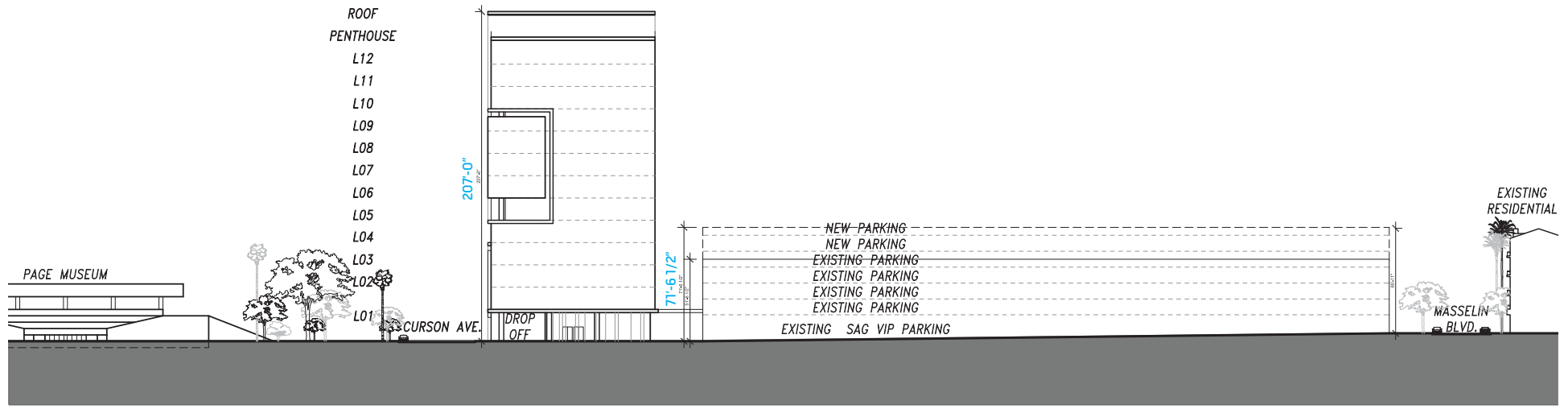




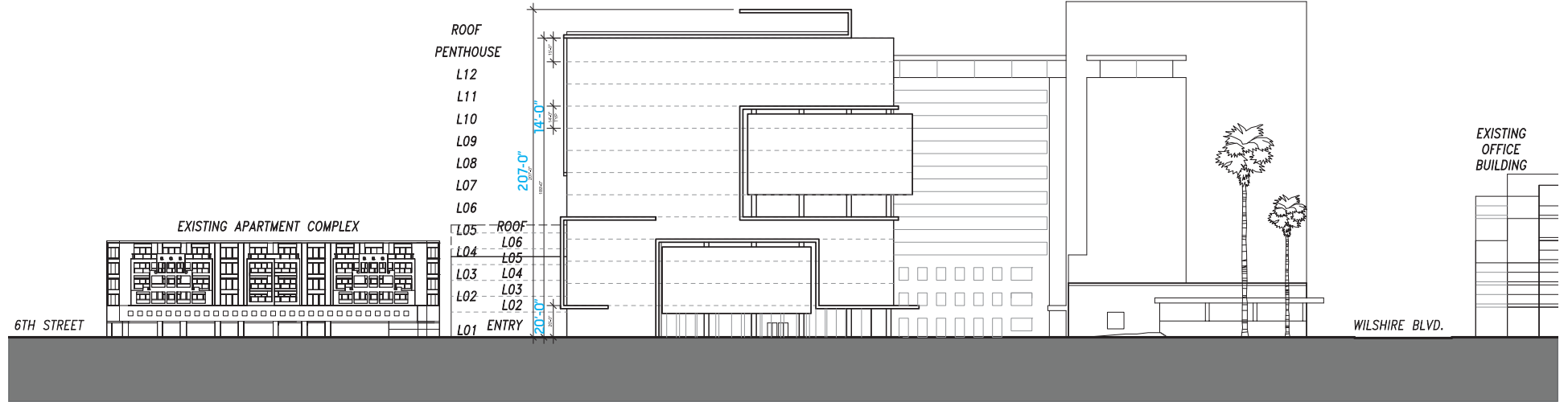
Source: Jerde, January 2013.



Source: Jerde, January 2013.



SOUTH ELEVATION



WEST ELEVATION

Source: Jerde, January 2013.



Source: Jerde, January 2013.

G. Lighting

Project lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent uses. Building security lighting operated by an energy management system would be used at all entry/exits and would remain on from dusk to dawn but would be designed to prevent glare onto adjacent properties. Lighting for all parking areas would remain lit at a lower level after normal business hours for security purposes.

H. Open Space and Landscaping

The Proposed Project would provide public amenities such as street trees, tree well covers, a landscaped plaza with a potential water feature, outdoor seating, bike racks, and trash receptacles. Furthermore, the Proposed Project would include an enhanced open air entry drive and courtyard with a dedicated office drop off area, upgraded lighting, including a well-lit pedestrian pathway garden/green buffer between the existing Museum Terrace residential complex and the new building, as well as a green wall design to enhance the parking structure façade. The Proposed Project would also incorporate water quality features, which includes a storm water quality treatment system designed to treat roof water.

I. Green Building and Sustainability

The Proposed Project's proximity to public transportation and services would aid in reducing vehicle miles traveled for employees. The Museum Square site is currently served by Metro buses and the LADOT DASH Fairfax service. As previously discussed, the nearest Metro rail line (Purple Line) Station is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Museum Square site. Under the Purple Line Extension project Planned Schedule for Section 1, two new Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue (approximately 0.7 mile (eight blocks, 3,696 feet) east of the Museum Square site) and Wilshire Boulevard and Fairfax Avenue (approximately 1/3 of a mile (one long block - 1,850 feet) west of the Museum Square site). Local bus routes serving this area include Metro Local Lines 20, 212/312, and 217 and Metro Rapid Lines 720 and 780. The City provides the Fairfax DASH shuttle service, which loops between the Hancock Park area to the Cedars-Sinai Medical Center and generally runs along Wilshire Boulevard, Fairfax Avenue, Melrose Avenue and La Cienega Boulevard. Additionally, the Wilshire Bus Rapid Transit (BRT) Project, which is scheduled for completion in November 2014, will convert the existing curb lane along Wilshire Boulevard to bus and right-turn-only operation during the weekday AM and PM peak periods throughout the area, which will improve area transit services and bus travel times by an estimated 24 percent. The Proposed Project is proximate to a variety of shops and services for employees (e.g., food services) that would further reduce the need for vehicle trips.

i. CALGreen Building Code

The 2013 California Green Building Standards Code, referred to as CALGreen, became effective on January 1, 2014. CALGreen sets minimum standards that all new structures can meet to minimize significantly the state's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new CALGreen standards. The CALGreen Standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

CALGreen requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. CALGreen's mandatory measures establish a minimum for green construction

practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs in a slow economy.

CALGreen also has more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The nonresidential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

The code addresses the critical issue of compliance verification by utilizing the existing building code enforcement infrastructure. The mandatory CALGreen measures would be inspected and verified by local building departments, in this case the City of Los Angeles Department of Building and Safety, using special inspectors as they determine necessary.

ii. Los Angeles Green Building Code

As of January 3, 2014, the City of Los Angeles implemented Ordinance No. 182,849 as the most recent update to the Los Angeles Green Building Code (“LA Green Building Code”). The LA Green Building Code is based on the 2013 California Green Building Standards Code and commonly known as CALGreen as discussed above, that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building’s energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All addition (residential and non-residential)
- Alterations with building valuations over \$200,000 (residential and non-residential)

iii. United States Green Building Council

Projects have the option to meet the intent of the criteria of the United States Green Building Council’s (“USGBC”) Leadership in Energy and Environmental Design (“LEED”) rating system’s “certified” performance level. Developers are required to submit a LEED checklist, a signed declaration from a LEED accredited professional asserting that the Project would meet the intent of the LEED rating system’s “certified” level, and a set of plans that identifies the LEED measures.

While building plans are still in the preliminary phase, the Proposed Project would be designed to meet all provisions of CALGreen, the LAGBC and LEED Green Building Rating System standards to reduce energy and water use, reduce waste, and reduce the carbon footprint.

Specific measures to be incorporated into the Proposed Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete and cardboard waste generated during demolition and construction;
- Installation of a “cool roof” that reflects the sun’s heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Use of energy efficient lighting;
- Use of Energy Star appliances for office equipment;
- Use of high energy efficiency rooftop heating and conditioning systems;
- Use of ultra low-flow toilets and low-flow metered hand-wash faucets;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to sewer systems.

J. Construction, Grading, and Phasing

The Proposed Project would be constructed over approximately 24 months. The Proposed Project would be constructed in three construction phases that would include demolition, excavation, and construction. Demolition could begin as early as June 2014. The Proposed Project would require the net export of up to 5,000 cubic yards of material from the site. The Proposed Project will require a haul route permit. The likely haul route for the project would utilize Wilshire Boulevard and La Brea Avenue to access the Santa Monica Freeway, with exported materials most likely disposed of at the Sunshine Canyon Landfill in Sun Valley.

4. PROJECT OBJECTIVES

The objectives of the Proposed Project are as follows:

- To provide infill commercial development by creating an iconic building in the Miracle Mile community, and implement good planning principles by constructing office uses along a major arterial and transit corridor.
- To provide a development that is compatible and complementary with surrounding land uses.
- To provide adequate parking facilities to serve the Proposed Project tenants and visitors.
- To maximize opportunities for the local and regional economy by constructing an economically viable Project that creates construction job opportunities, and attracts commercial tenants to the Proposed Project.
- To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.

5. DISCRETIONARY ACTIONS AND APPROVALS

The City of Los Angeles Planning Department is the lead agency for the Proposed Project. In order to permit development of the Proposed Project, the City may require approval of one or more of the following discretionary actions:

- A Lot Split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development and parking structure), to create a separate, financeable parcel under the new building;
- A Zone Change to convert the approximately 118,596 sf portion of the parcel which contains a portion of the surface parking lot and the parking structure (the Proposed Project Site), from QPB-2 zoning to (Q)C4-2 zoning;
- A Conditional Use Permit to allow floor area ratio averaging for a unified commercial development in a C zone, which is requested in conjunction with the subdivision of the current parcel into two parcels.
- A Variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required for auditorium space;
- Removal of the current 15' building line setback in connection with the Zone Change and needed for the Project to be properly situated on the Site and consistent with the Miracle Mile CDO, which was adopted subsequent to the 15' building line setback, and requires that buildings be built "to the street" (note: a two foot irrevocable right of way easement was dedicated and recorded April 1997);
- Green Building Program Applications; and
- Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate, in order to execute and implement the Proposed Project. Such approvals may include, but are not limited to: architectural design, landscaping, lighting and signage in accordance with the City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Transportation permits for driveways/curb cuts; storm water discharge permit; issuance of permits from the City of Los Angeles Department of Building and Safety that may include permit approvals for demolition and grading, approval of the haul route for the export of demolition debris, approvals for foundations, and structural improvements; building permits; installation and hookup approvals for public utilities and related permits. Additional discretionary or ministerial action may include sewer and water hook-up permits from the City of Los Angeles Department of Water and Power and a Site Plan review by Department of City Planning.

Federal, state, and regional agencies that may have jurisdiction over some aspect the project include, but are not limited to:

- Metropolitan Transportation Authority (Metro);
- Regional Water Quality Board;
- South Coast Air Quality Management District; and
- California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.

III. ENVIRONMENTAL SETTING

1. OVERVIEW OF ENVIRONMENTAL SETTING

Regional Setting

The Museum Square site is located in Los Angeles County, in the Miracle Mile area of the City of Los Angeles (the City) (see Section II [Project Description], Figure II-1 [Regional and Project Vicinity Map]). The Museum Square site is within the Wilshire Community Plan and the Miracle Mile Community Design Overlay (CDO) Areas.

The Wilshire Community Plan Area is often spoken of as the Mid-City section of Los Angeles. The eastern edge of the approximately 2.5 mile wide by 6-mile long plan area is about 6 miles west of downtown Los Angeles, while the western edge abuts the City of Beverly Hills. Wilshire is surrounded by the City of Los Angeles community plan areas of Hollywood to the north; South Central Los Angeles and West Adams-Leimert-Baldwin Hills to the south; Silverlake-Echo Park and Westlake to the east; and West Los Angeles to the west.

The Wilshire Community Plan Area has a pattern of low to medium density residential uses interspersed with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major boulevards including Wilshire, Pico, La Cienega, Western and Vermont. The plan area east of Western Avenue contains large concentrations of higher density residential neighborhoods surrounding the regional commercial area known as Wilshire Center.

The Hollywood Freeway is the only freeway within the Wilshire Plan Area. The Harbor Freeway (I-110) is located one mile to the east; the Santa Monica Freeway (I-10) is located one mile to the south; and the San Diego Freeway (I-405) is approximately five miles to the west of the community plan boundaries.

The Metro Purple Line subway also serves the Wilshire Community Plan area, running along portions of Wilshire Boulevard and Vermont Avenue. The line currently terminates at Wilshire/Western, 2.7 miles east of the Museum Square site. However, an extension is planned by Metro to extend the Purple Line further westward for about nine miles with seven new stations, including Wilshire/La Brea and Wilshire/Fairfax in the Museum Square site vicinity. Construction for the first section of the project is due to begin in 2014 and be completed in 2023.

Local Setting and Land Uses

The Museum Square site is fully developed with an 11-story, approximately 530,000 square foot commercial office complex with an associated surface parking lot and parking structure. The existing building complex is located on the southern approximately one-half of the lot with a surface parking area and parking structure located on the northern half of the lot. The existing office building complex was originally constructed in 1948 as the Prudential Insurance Company Building. However, substantial renovations and improvements have been made to the building since that time and due to the extent of these changes, the building has not been listed in a local, state or national historic preservation register, nor has it been determined eligible for historic designation. The existing parking structure was approved and constructed in 1983.

Current tenants in the Museum Square building complex include office, banking and restaurant uses, with a concierge, conferencing facility, convenience store, dry cleaning and other amenities on site.

There are 43 trees with a trunk diameter greater than eight inches (8") in diameter at breast height (DBH) located in the area of the Museum Square site that will be redeveloped; all of the trees are ornamental/non-native species. An approximately 12 foot high hedgerow of Indian Laurel Fig (*Ficus retusa nitida*) currently screens the surface parking lot from view along Curson Avenue. There are two Jacarandas (*Jacaranda mimosifolia*) planted as street trees in the parkway along Curson Avenue in front of the surface parking lot area to be redeveloped.. The topography of the Museum Square site is relatively flat, with a gradual slope from the north to the south. Views of the existing Museum Square site and surrounding development are shown in Figures III-1 through III-12.

Vehicular access to the Museum Square site is provided by the Hollywood Freeway (I-101) approximately 4.5 miles to the north of the Museum Square site, and the Santa Monica Freeway (I-10) approximately three miles south of the Museum Square site. Major nearby arterials contributing to site access include 6th Street, 3rd Street and Beverly Boulevard to the north, Hauser Boulevard and S. La Brea Avenue to the east, Wilshire Boulevard, Olympic Boulevard and San Vicente Boulevard to the south, and Fairfax Avenue and Crescent Heights Boulevard to the west.

Several public transit services run adjacent to the Museum Square site, including several Los Angeles County Metropolitan Transportation Authority (Metro) bus routes, and a City of Los Angeles Department of Transportation (DOT) DASH shuttle service route. As mentioned above, the nearest Metro rail line (Purple Line) Station is currently located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Museum Square site, but new Metro Purple Line stations are planned in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue and Wilshire Boulevard and Fairfax Avenue.



View 1: View from the northwest corner of Curson Avenue & 6th Street looking south toward the project site.



View 2: View down Curson Avenue looking south at the project site.



View 3: View of the project site looking east from across the street at ground level on the LACMA Art Park.

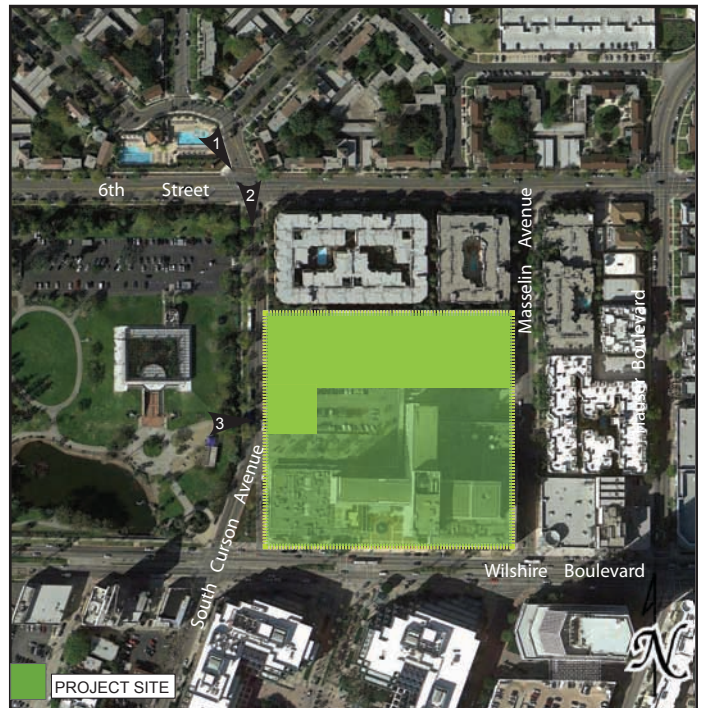


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 4: View of the project site looking east from across the street at the LACMA Art Park standing on the berm of the Page Museum.



View 5: View of the project site looking east at street level on Curson Avenue.



View 6: View looking south down Curson Avenue at Wilshire Boulevard.

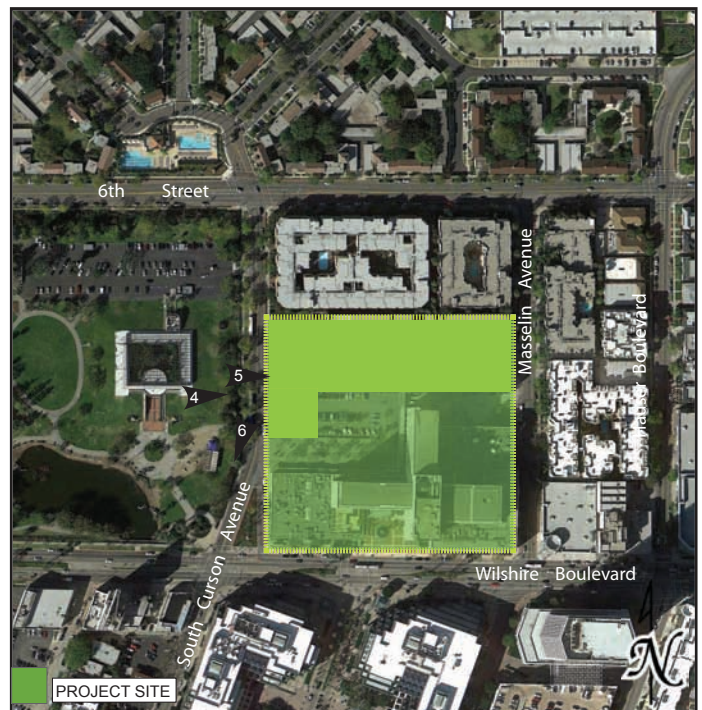


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 7: View from the southwest corner of Curson Avenue and Wilshire Boulevard looking northwest toward the LACMA Art Park and the Page Museum.



View 8: View from the southwest corner of Curson Avenue and Wilshire Boulevard looking east.



View 9: View from the southwest corner of Curson Avenue and Wilshire Boulevard looking north toward the project site.

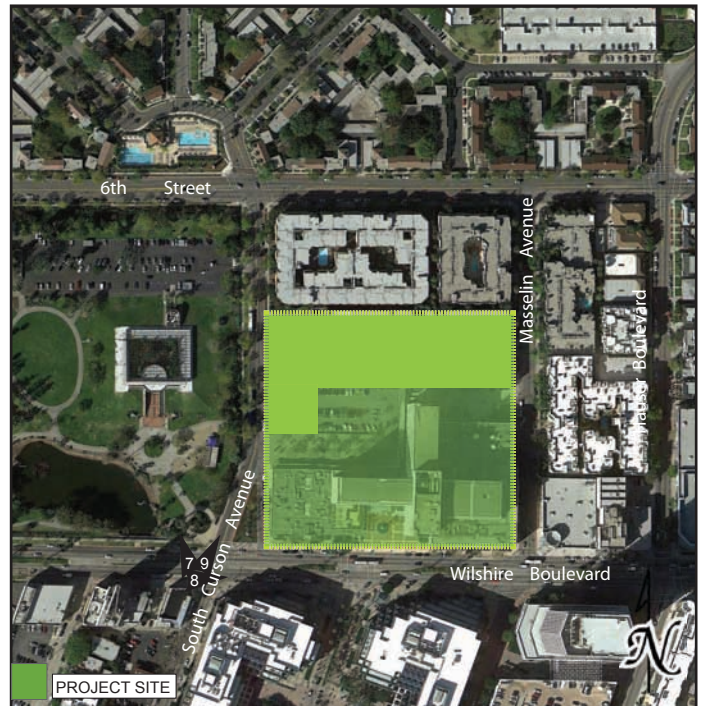


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 10: View of the project site looking east from Curson Avenue – southern driveway entrance.



View 11: View looking north along Curson Avenue toward the project site.



View 12: View of the project site looking north from the southern (internal) driveway.

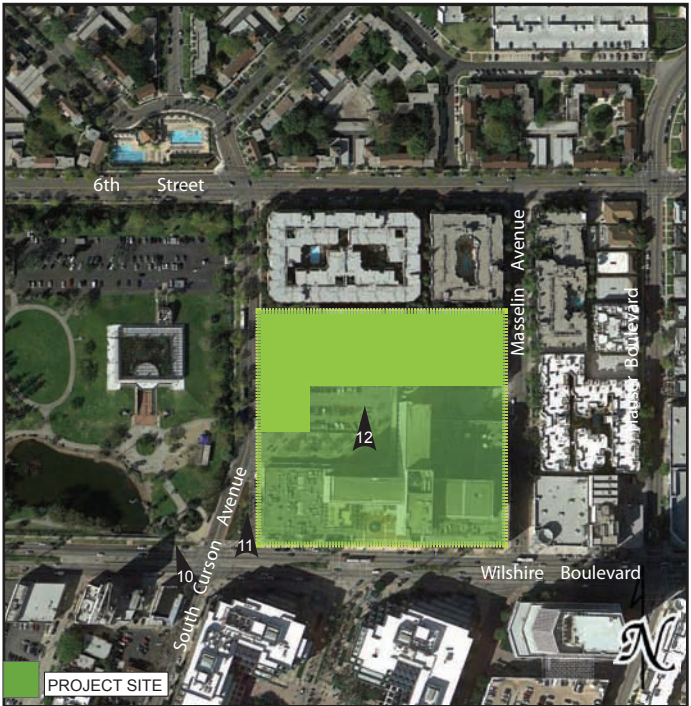


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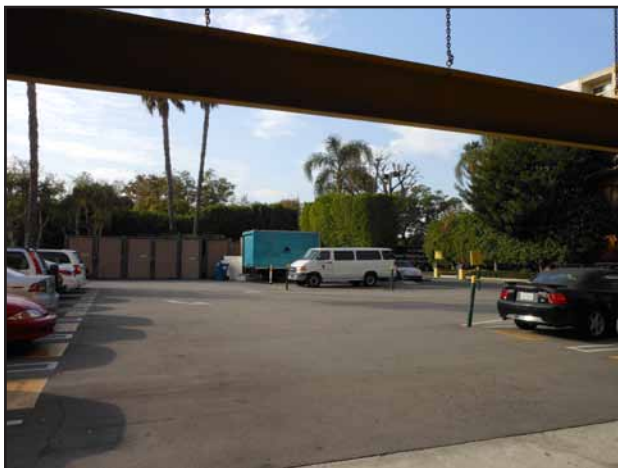
Source: EcoTierra Consulting, January 2013.



View 13: View of the project site looking north from the southern (internal) driveway.



View 14: View of the project site looking south from the northern (internal) driveway.

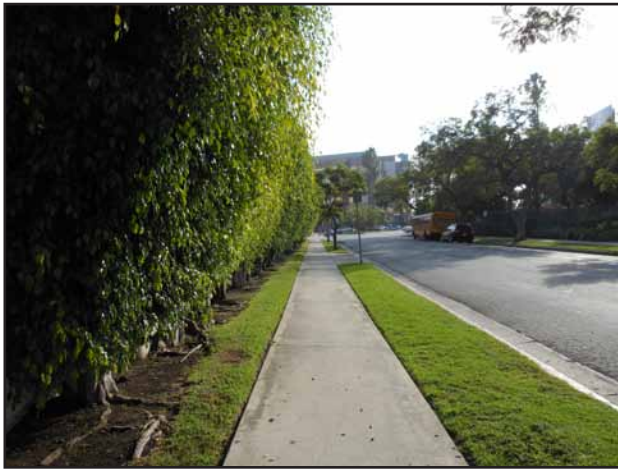


View 15: View of the project site looking west from the parking structure driveway.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 16: View from Curson Avenue looking south from in front of the project site.



View 17: View from Curson Avenue looking east that the project site – northern driveway entrance.



View 18: View from Curson Avenue looking north from in front of the project site.

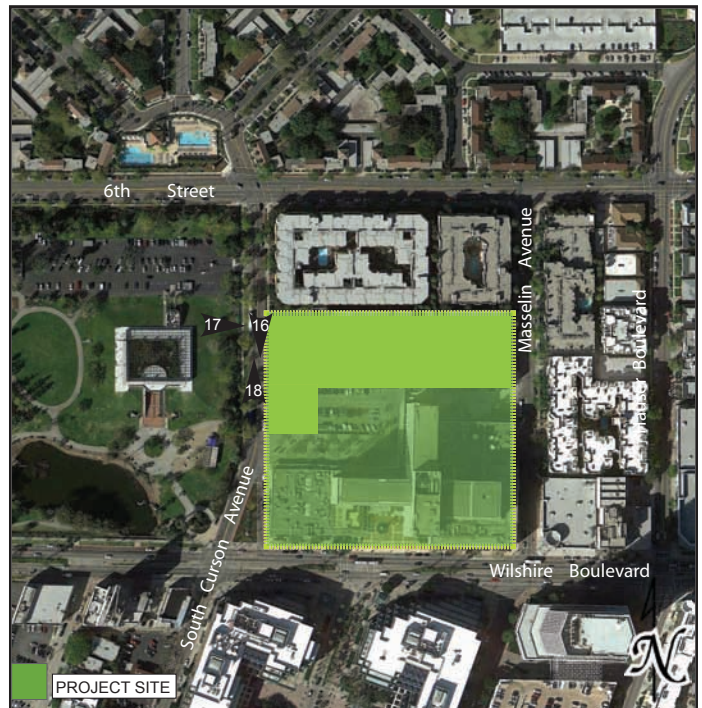


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 19: View from Masselin Avenue looking south at the Masselin Park West apartment building and the project site's five-story parking structure.



View 20: View from Masselin Avenue looking south at the Project Site's five-story parking structure and the Museum Square 11-story office building.



View 21: View from Masselin Avenue looking south at the Project Site's five-story parking structure and entry driveways, with the Museum Square 11-story office building.

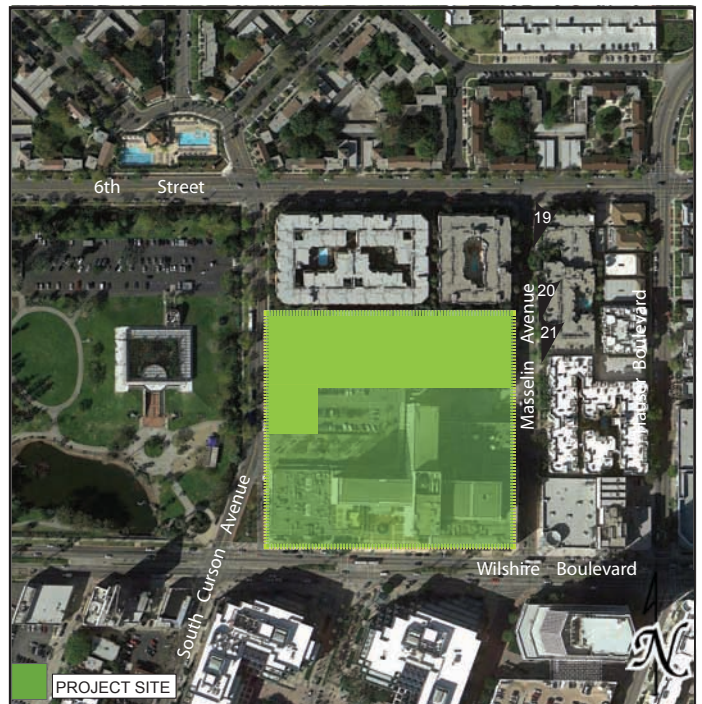


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 22: View of entry driveway to project site from Masselin Avenue.



View 23: View from Masselin Avenue looking north at the project site's five-story parking structure and entry driveways.



View 24: View from the southwest corner of Masselin Avenue looking north at the two-story commercial retail (Office Depot) building.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 25: View from the northeast corner of Masselin Avenue looking north toward the Project Site.



View 26: View from the northwest corner of Masselin Avenue looking north toward the two-story commercial retail (Office Depot) building and the Renaissance Apartment Homes building.



View 27: View of the five-story Renaissance Apartment Homes building.

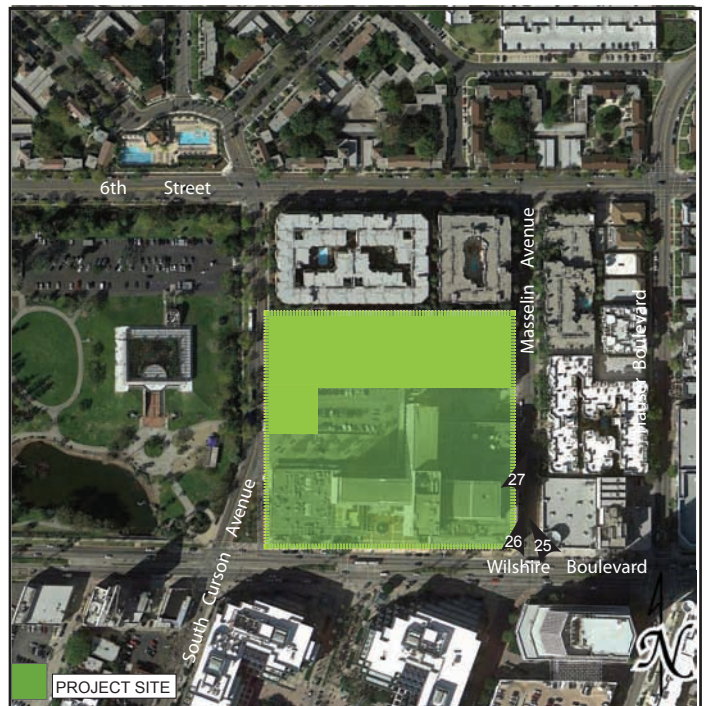
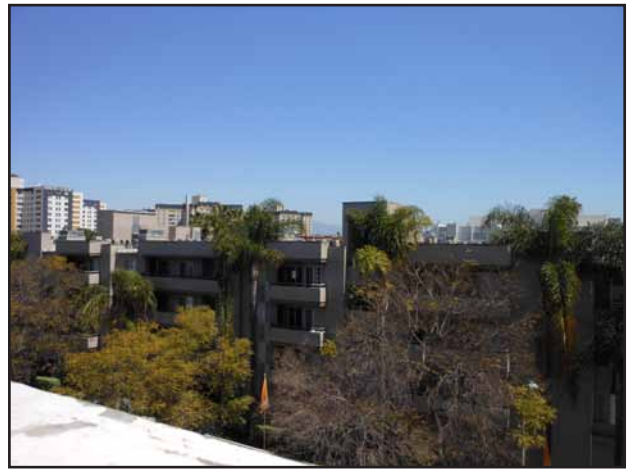


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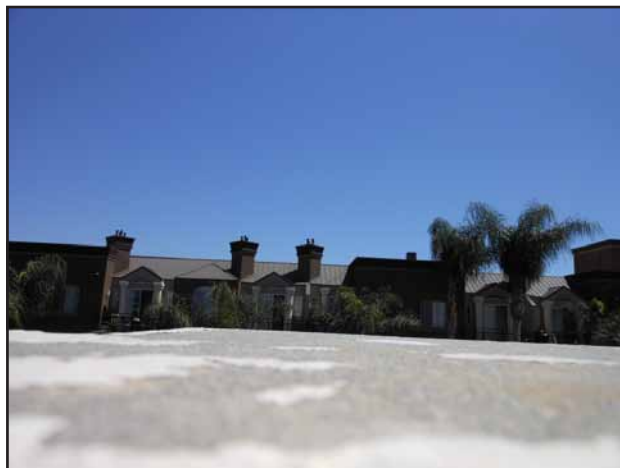
Source: EcoTierra Consulting, January 2013.



View 28: View from the top of the existing parking structure looking north toward the Masselin Park West apartment building.



View 29: View from the top of the existing parking structure looking northeast toward the Tiffany Court Apartment Homes.



View 30: View from the top of the existing parking structure looking east toward the Renaissance Apartment Homes building.

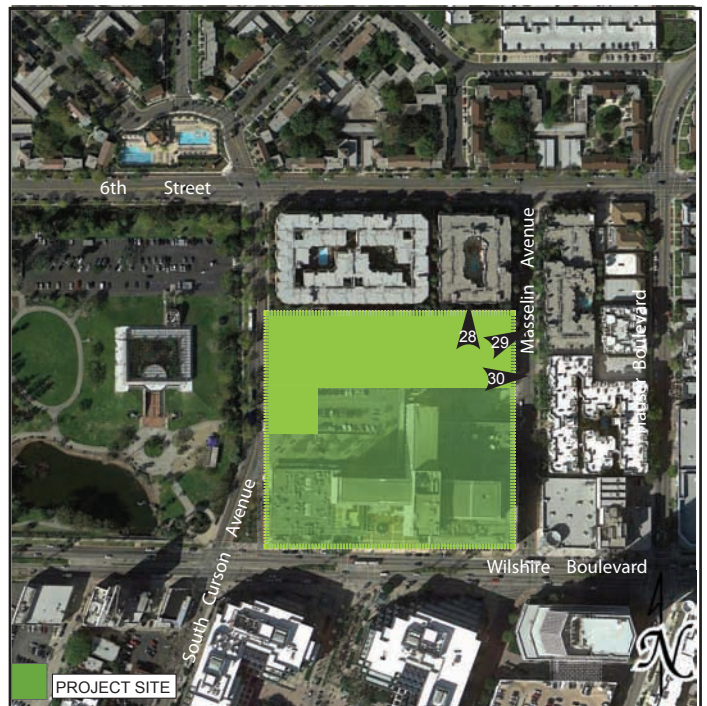


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 31: View from the top of the existing parking structure looking east toward the Masselin Park West apartment building (on the far left), Tiffany Court Apartment Homes (barely visible, center left) and the Renaissance Apartment Homes building (on the center right).



View 32: View from the top of the existing parking structure looking northwest toward the Museum Terrace Apartments building.



View 33: View from the top of the existing parking structure looking north toward the Museum Terrace Apartments building (on the left) and the Masselin Park West apartment building (on the right).

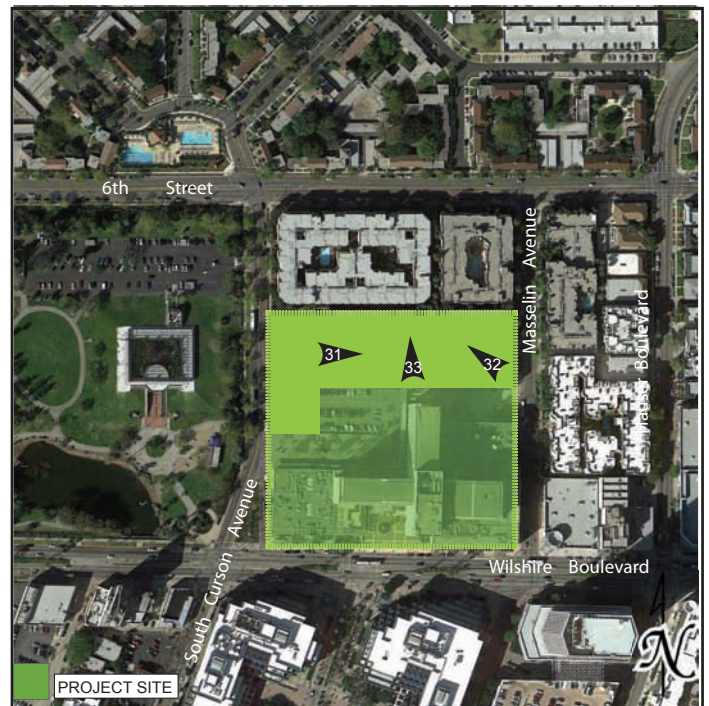
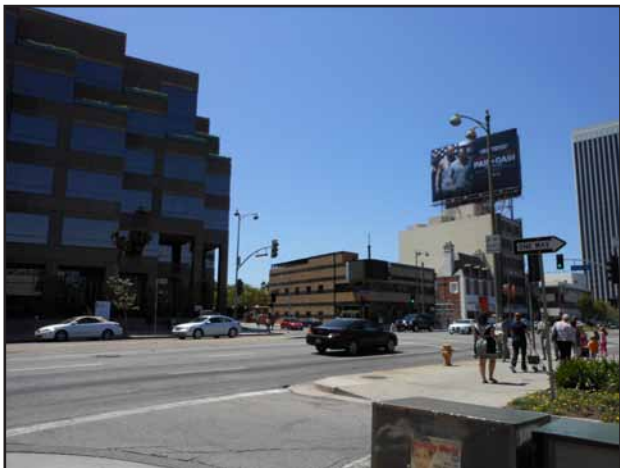


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.



View 34: View from the northeast corner of Curson Avenue looking south.



View 35: View from in front of the Museum Square complex, looking south towards the Wilshire Courtyard complex.



View 36: View from in front of the Museum Square complex, looking south towards the Wilshire Courtyard complex, down the center internal access road.

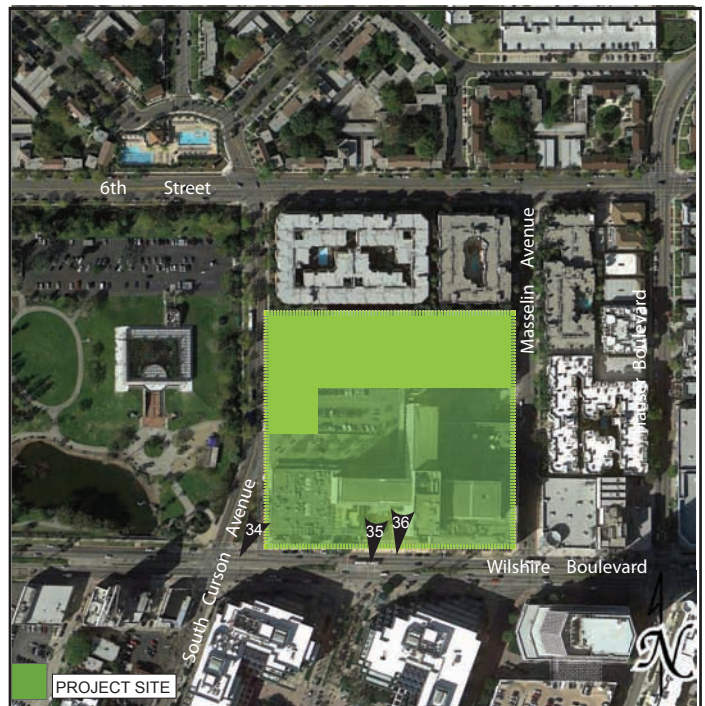


PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2013.

Surrounding Land Uses

The Museum Square site is located on a heavily trafficked segment of Wilshire Boulevard in the Miracle Mile area of the City west of downtown Los Angeles and Mid-City. The land uses within the general vicinity of the Museum Square site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction.

The area immediately surrounding the Museum Square site is developed with a mix of multi-family residential, commercial, retail and institutional buildings with associated parking structures and surface parking lots, of varying architectural style and dates of construction. Sharing the block and to the immediate north of the Museum Square site are the five-story Museum Terrace Apartments building (600 S. Curson Avenue) and the five-story Masselin Park West apartment building (5700 W. 6th Street). To the north of that, across W. 6th Street, is the 160 acre, Park La Brea residential development which includes 18 Art Deco style apartment towers, along with numerous Modern Colonial style low-rise townhouse and garden apartment buildings, providing over 4,000 residences and affiliated on-site amenities. Sharing the parcel and to the south on the Museum Square site, fronting along Wilshire Boulevard, is the existing 11-story, approximately 530,000 square foot Museum Square Office building complex. Across Wilshire Boulevard, south of the Museum Square site, is the Wilshire Courtyard complex (5700 and 5750 Wilshire Boulevard), comprised of two six-story commercial office buildings linked by a central drive and park-like open spaces. Directly east of the Museum Square site (across Masselin Avenue) are a two-story commercial retail building housing an Office Depot store and two five-story, multi-family residential developments; Renaissance Apartment Homes located at 630 Masselin Avenue and Tiffany Court Apartment Homes, located at 616 Masselin Avenue. West of the Museum Square site is Hancock Park and the George C. Page Museum, which is part of the Natural History Museum of Los Angeles County and includes the La Brea Tar Pits and associated paleontological sites.¹ The La Brea Tar Pits are a registered National Natural Landmark, a federal program that recognizes and encourages the conservation of outstanding examples of the natural history of the United States. The 20-acre, seven building campus of the Los Angeles County Museum of Art (LACMA) is located to the west of this facility.

2. RELATED PROJECTS

Sections 15126 and 15130 of the State CEQA Guidelines provide that EIRs consider the significant environmental effects of a project as well as “cumulative impacts.” Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (CEQA Guidelines Section 15130 [b][1][A]).

All proposed (those with pending applications), recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the Proposed Project are included in this EIR. For an analysis of the cumulative impacts associated with these related projects and the Proposed Project, cumulative impact

¹ For purposes of this EIR, references to “Hancock Park” are meant to encompass the Page Museum, La Brea Tar Pits, excavation pits, observation pits, gardens, walkways and open space areas associated with this facility.

discussions are provided under each individual environmental impact category in Section IV (Environmental Impact Analysis) of this EIR.

The list of 48 projects (see Table III-1 [List of Related Projects]) includes all approved, under construction, proposed, or reasonably foreseeable projects within the Study Area that are expected to be completed by the anticipated Proposed Project buildout and occupancy. Of the 48 related projects, 28 are located in the City of Los Angeles, six are in the City of Beverly Hills, and 14 are in the City of West Hollywood.

The list of related projects is not intended to be the exclusive list of projects that may occur during the buildout period, which cannot be known in an absolute or exhaustive way. Instead, the list is intended to demonstrate the anticipated magnitude of development that may occur in the Miracle Mile area during this period based on projects currently on file with appropriate local municipalities. Furthermore, the related projects list provides a conservative analysis because it is unlikely that all of the projects on the list will be developed due to various circumstances that could arise during the typical planning process. The related projects are shown on Figure III-13 (Location of Related Projects).

**Table III-1
List of Related Projects**

Map No.	Project	Size	Location
City of Los Angeles			
1	Archstone Hollywood Mixed-use Project	7,276 sf Specialty Retail 7,825 sf Quality Restaurant 40,654 sf Office 348 du Apartment (8) du Single-Family Housing ^a (4) du Apartment (30,000) sf Warehousing ((6,000) sf Avon Studio Transportation (5,600) sf Premium Collision Center (4,400) sf Melrose Tow (5,600) sf Vacant Buildings	6911 W Santa Monica Blvd.
2	The Lexington Development Mixed-use Project	786 du Mid-Rise Apartment 4,000 sf High-Turnover Restaurant 5,500 sf Fast-Food Restaurant w/out Drive-Through Window 12,700 sf Specialty Retail (43,226) sf Nightclubs (17,596) sf Hardware/Paint Store (50,972) sf Mini-Warehouse (18,660) sf Vacant Banquet Hall	6677 W Santa Monica Blvd.
3	936 N La Brea Avenue	88,750 sf Office 12,000 sf Retail	936 N La Brea Avenue
4	La Brea Gateway Project Mixed-use Project	179 du Apartment 33,500 sf Supermarket (14,530) sf KCOP Admin. Office (42,136) sf KCOP Studio	915 N La Brea Avenue
5	6601 W Romaine Street	104,155 sf Office 19,700 sf Storage	6601 W Romaine Street
6	959 N Seward Street	240,000 sf Office	959 N Seward Street

**Table III-1
List of Related Projects**

Map No.	Project	Size	Location
7	956 N Seward Street	130,000 sf Office	956 N Seward Street
8	712 N Wilcox Avenue	100 du Apartment	712 N Wilcox Avenue
9	Yeshivath Torath Emeth Academy Expansion	120 stu Pre-K & Kindergarten 60 stu Nursery School	7002 W Clinton Street
10	7901 W Beverly Boulevard Mixed-use Project	71 du Apartment 11,454 sf Retail	7901 W Beverly Boulevard
11	111 S The Grove Drive	171,225 sf Self-Storage Facility	111 S The Grove Drive
12	La Brea Mixed-Use Project	26,400 sf Retail 180 du Condominium 3,000 sf Restaurant	101 S La Brea Avenue
13	3rd & Fairfax Gilmore Project	43,250 sf Retail	7929 W 3rd Street
14	6298 W 3rd Street	300 du Condominium	6298 W 3rd Street
15	Third Street Mixed-Use Project	60 du Apartment 5,350 sf Retail	5863 W 3rd Street
16	6535 Wilshire Boulevard Mixed-Use Project	57,000 sf Office 21 du Apartment 6,000 sf Retail	6535 Wilshire Boulevard
17	Wilshire Skyline Project Mixed-Use Project	130 du Apartment 32,000 sf Retail <i>(9,600) sf Restaurant</i>	6411 W Wilshire Boulevard
18	Wilshire & Crescent Heights Mixed-Use Project	158 du Apartment 4 du Townhome 4,200 sf Bank 1,570 sf Coffee/Fast Food 1,080 sf Ground Floor Retail <i>(7,117) sf Wells Fargo Bank</i>	6245 W Wilshire Boulevard
19	5900 Wilshire Commercial Project	489,564 sf Office 14,688 sf Health Club 7,344 sf Quality Restaurant 3,500 sf High-Turnover Restaurant <i>(477,220) sf Office</i> <i>(14,688) sf Health Club</i> <i>(14,688) sf Museum</i>	5900 W Wilshire Boulevard
20	725 S Curson Avenue	28,800 sf Office 800 sf Restaurant	725 S Curson Avenue
21	Desmond's Tower Project	175 du Apartment	5500 W Wilshire Boulevard
22	5410 W Wilshire Boulevard	6,760 sf Restaurant 590 sf Retail Expansion	5410 W Wilshire Boulevard
23	Wilshire and La Brea Project	562 du Mid-Rise Apartment 37,000 sf Retail 3,000 sf High-Turnover Restaurant 5,000 sf Quality Restaurant <i>(35,000) sf Church</i> <i>(30,000) sf Retail</i>	5200 W Wilshire Boulevard
24	1417 Hi Pointe Street	77 du Apartment	1417 Hi Pointe Street
25	Mid-City Vons Project	55,920 sf Supermarket <i>Existing Supermarket</i>	1430 S Fairfax Avenue

**Table III-1
List of Related Projects**

Map No.	Project	Size	Location
26	Washington Square Redevelopment Project	217 du Condominium/Townhome 125 du Apartment 230,000 sf Shopping Center <i>(111,000) sf Shopping Center</i>	4040 W Washington Blvd.
27	Academy Museum of Motion Pictures ^b	50,500 sf Exhibit Areas 19,500 sf Collections & Exhibit Support 54,500 sf Theater & Theater Support 5,000 sf Museum Store 4,000 sf Museum Café 33,000 sf Lobby & Visitor Services 23,000 sf Administration 26,000 sf Event/Function Space 3,000 sf Kitchen/Catering 10,500 sf Restrooms	6067 Wilshire Boulevard
28	Metro Purple Line Extension	3.9 miles of subway underneath Wilshire Boulevard between Western Avenue and just west of La Cienega Boulevard with stations at Wilshire/La Brea and Wilshire/Fairfax	
City of Beverly Hills			
1	9230 Wilshire Boulevard	150,300 sf Automobile Sales	9230 Wilshire Boulevard
2	9200 Wilshire Boulevard Mixed-Use Project	53 du Condominium 8,400 sf Retail 5,600 sf Quality Restaurant	9200 Wilshire Boulevard
3	8767 Wilshire Boulevard	60,856 sf Office 11,260 sf Retail 3,000 sf High-Turnover (Sit-Down) Restaurant	8767 Wilshire Boulevard
4	8600 Wilshire Boulevard Mixed-Use Project	21 du Condominium 4,800 sf Retail <i>(2,500) sf Retail</i>	8600 Wilshire Boulevard
5	121 San Vicente Boulevard	35,000 sf Medical-Dental Office Building	121 San Vicente Boulevard
6	401 S Robertson Boulevard	2,496 sf Convenience Market (Open 24 Hours)	401 S Robertson Boulevard
City of West Hollywood			
1	Walgreens Mixed-Use Project	15,414 sf Retail Space 18 du Condominium 2 du Apartment <i>(16,681) sf commercial buildings</i>	8120 Santa Monica Blvd
2	Monarch Fountain & La Brea Mixed-Use Project	187 du Apartment 5,664 sf Convenience Store 7,089 sf Restaurant 2,300 sf Coffee Shop 4,506 sf Bank	1222 La Brea Avenue
3	1201 La Brea Avenue	4,575 sf Restaurant	1201 La Brea Avenue
4	Movietown	32,300 sf Retail	7302 Santa Monica Blvd.

**Table III-1
List of Related Projects**

Map No.	Project	Size	Location
	Mixed-Use Project	294 du Condominiums 76 du Apartments	
5	The Lot Office/Media Support Project	748 stall Parking Structure	1041 Formosa Avenue
6	Faith Plating Mixed-Use Project	9,300 sf Retail 133 du Condominiums 33 du Apartments	7144 Santa Monica Blvd.
7	Santa Monica & La Brea Mixed-Use Project	184 du Apartment 3,300 sf Convenience Store 4,800 sf Restaurant 3,250 sf Pharmacy 2,000 sf Bank	7113 Santa Monica Blvd.
8	Melrose Triangle Project	70,259 sf Retail / Commercial 195 du Apartments 327,000 sf Storage	9040, 9060, 9080, 9098 Santa Monica Blvd
9	La Peer Hotel Project	69 hotel rooms 8 du Condominiums	623 La Peer Drive
10	8687 Melrose Avenue	400,000 sf Office	8687 Melrose Avenue
11	8650 Melrose Avenue	14,571 sf Retail	8650 Melrose Avenue
12	8612 Melrose Avenue	9,998 sf Restaurant	8612 Melrose Avenue
13	8583 Melrose Avenue	9,545 sf Retail / Commercial 7 du Apartment	8583 Melrose Avenue
14	8564 Melrose Avenue	28,474 sf Retail/Commercial	8564 Melrose Avenue
<p><i>sf = square feet, du = dwelling unit, stu = students</i></p> <p><i>a – Projects noted in italics with (sf in parentheses) are to be removed</i></p> <p><i>b - According to the Initial Study for the Academy Museum of Motion Pictures (AMMP) project, dated May 2013, the project will consist of numerous uses totaling 229,000 square feet. The AMMP project is expected to be completed no sooner than the year 2017. As the AMMP traffic study is under preparation at this time, its trip generations are unavailable.</i></p> <p><i>Source: Crain & Associates, 2014.</i></p>			

It should also be noted that although LACMA has been the subject of news stories regarding redevelopment, no development plans have been filed with the City, thus the project remains speculative and is not included in this analysis.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

1. INTRODUCTION

The lead agency, the City of Los Angeles, Department of City Planning, has determined that the proposed project would not result in potentially significant impacts related to the environmental topics listed below. Pursuant to Section 15128 of the State CEQA Guidelines:

“An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.”

An Initial Study was prepared for the Proposed Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impacts and the reasons that each environmental topic is or is not analyzed further in the EIR.

It has been determined through the Initial Study that there is no substantial evidence that the proposed project could cause significant environmental effects in the following areas: Agricultural Resources, Biological Resources, Historical Cultural Resources, Mineral Resources, and Population and Housing. Therefore, no further environmental review of these issues is necessary. A summary of the analysis provided in Appendix A for these environmental topics is provided below.

A. AESTHETICS

The proposed project would not have a substantial adverse effect on a scenic vista. For the purpose of this environmental review, a significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the City of Los Angeles L.A. CEQA Thresholds Guide 2006, the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

The full Museum Square site is a rectangular shaped property that is approximately 7-1/2 acres (327,613 square feet); it is fully developed with a commercial office complex, an associated surface parking lot, and a five-story parking structure. The Proposed Project Site is the approximately 135,831 sf northern

portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot. The nearest designated scenic highway to the Project Site is the 'Miracle Mile' section of Wilshire Boulevard, located immediately to the south of the Proposed Project Site. The proposed new Museum Square Office Building has primary street frontage on South Curson Avenue on the northwestern portion of the Site. This position on the Site is set back from the predominant vehicular thoroughfare of Wilshire Boulevard and only appears when driving eastbound on the opposite side of the street. Approaching the Site going westward on Wilshire, the new office building would be concealed visually by the existing Museum Square buildings. The Proposed Project is designed to offer a formalized backdrop to the seven-building Los Angeles County Museum of Art (LACMA) campus and Hancock Park while enhancing the surrounding public spaces by concealing the parking garage within the existing Museum Square Office Building complex. Thus the proposed Museum Square Office Building may contribute to improving the visual quality along the Miracle Mile Corridor. Scenic vistas of the Santa Monica Mountains to the north would not be adversely altered by the Proposed Project.

There are no significant natural features (such as trees, rock outcroppings, bodies of water, or substantial stands of native vegetation) found on the Project Site. In addition, there are no major open spaces found on the Project Site and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the portion of the Project Site to be redeveloped. There are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177,404 (i.e., native oaks [*Quercus* sp.], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*]) on the Project Site. The only vegetation on the Project Site consists of the ornamental trees and shrubbery planted throughout the parking lot and along Curson Avenue. The Proposed Project includes landscaping, which would include various shrubs, ground cover plants, and trees. Thus the removal and replanting of landscaping would not degrade the visual qualities of the Project Site and surrounding area and may actually improve them. Impacts to on-site scenic resources would be less than significant.

Under the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact occurs only when the proposed project adversely affects the public view of a scenic vista, and therefore, impacts to private views are not considered to be significant under the Thresholds Guide. Nevertheless, private views from nearby residential buildings are valued by existing residents, and an analysis of the Proposed Project's impacts to private views is included herein.

The Project Site does not contain any unique scenic vistas, as it is entirely comprised of surface parking lot and parking structure uses.

The adjacent LACMA campus and Hancock Park to the west of the Project Site could be considered scenic resources. However, because the existing five-story parking structure is approximately the same height as the five-story multi-family residential buildings to the east and northeast of the Project Site it currently blocks any potential views of the LACMA campus and Hancock Park (refer to Figures III-11 and III-12). Therefore no impacts to private views from buildings located along Masselin Avenue would occur as a result of the implementation of the Proposed Project. A small number of residential units on the top (fifth) floor of the Museum Terrace apartment building along the south side may have very limited views of the LACMA campus and Hancock Park (refer to Figure III-12, View #32). However, as these views are already compromised, the elimination of these private views as a result of the implementation of the Proposed Project would be considered a less than significant impact and no further analysis of this issue is necessary.

The Proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a city-designated scenic highway. Based on the

City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact would occur only if scenic resources would be damaged and/or removed by development of a project.

The nearest designated scenic highway to the Project Site is the 'Miracle Mile' section of Wilshire Boulevard, located immediately to the south of the Proposed Project Site.¹ As previously discussed, there are no scenic resources, such as native California trees or rock outcroppings on the Project Site. There are no buildings designated as historic on the Proposed Project Site; the Proposed Project Site would not be subject to a Historic Preservation Review, nor is it within a Historic Preservation Overlay Zone.² The nearest designated state historic resource is Hancock Park (5801 Wilshire boulevard, State Monument #170, La Brea Tar Pits).³ The proposed new Museum Square Office Building is designed to offer a formalized backdrop to the seven-building LACMA campus and Hancock Park while enhancing the surrounding public spaces by concealing the parking garage within the existing Museum Square Office Building complex. Thus the proposed Museum Square Office Building may contribute to improving the visual quality along the Miracle Mile Corridor. The Proposed Project would not damage and/or remove any scenic resources within a state or city designated scenic highway, and therefore no impact would occur and no further analysis of this issue is necessary.

The Proposed Project has the potential to substantially degrade the existing visual character or quality of the site and its surroundings unless mitigation is incorporated. For the purpose of this environmental review, a significant impact may occur if the project introduced incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

General Character Significance Methodology

Based on the City of Los Angeles L.A. CEQA Thresholds Guide 2006, the determination of whether the project results in a significant aesthetic impact shall be made considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

¹ California Scenic Highway Mapping System, State of California Department of Transportation, website: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.

² City of Los Angeles Department of Planning, Zone Information and Map Access System, 5701 W. Wilshire Blvd (et al), website: <http://zimas.lacity.org/>, November 28, 2012.

³ City of Los Angeles, Department of City Planning, Historic-Cultural Monument (HCM) Report, Wilshire Planning Community, website: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result.cfm?community=Wilshire, accessed December 21, 2012.

- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

General Character of the Project Site and Surrounding Area

The Project Site is located within the Wilshire Community Plan area. The existing land uses located within the Wilshire Community Plan area are characterized by a dense concentration of medium to high intensity commercial, retail, mixed-use, multi-family and single-family residential uses. The Project Site is located within a portion of this area along on a segment of Curson Avenue and Masselin Avenue between Wilshire Boulevard and 6th Street.

The Project Site is located in an urbanized setting and is surrounded by commercial uses, institutional uses, multi-family residential uses and surface parking lots. High-density commercial and institutional uses are located along Wilshire Boulevard to the east and west of the Project Site. Directly to the north of the Project Site is the 212-unit, five-story Museum Terrace Apartments building (600 S. Curson Avenue); to the north of that, along W. 6th Street, is the 160 acre, Park La Brea residential development which includes 18, 13-story, approximately 121 foot Art Deco style apartment towers⁴, along with numerous Modern Colonial style low-rise townhouse and garden apartment buildings, providing over 4,000 residences and affiliated on-site amenities. On the eastern portion of the Project Site is the five level parking structure which serves the existing Museum Square Office building complex. Directly east of the Project Site (across Masselin Avenue) are a two-story commercial retail building housing an Office Depot store and two five-story, multi-family residential developments; Renaissance Apartment Homes located at 630 Masselin Avenue and Tiffany Court Apartment Homes, located at 616 Masselin Avenue. On the Project Site to the south, fronting along Wilshire Boulevard, is the existing 11-story, approximately 530,000 square foot Museum Square Office building complex, which includes office, banking, concierge, conferencing facility, convenience store, dry cleaning and restaurant uses. Across Wilshire Boulevard, south of the Project Site, is the Wilshire Courtyard complex (5700 and 5750 Wilshire Boulevard), comprised of two six-story commercial office buildings linked by a central drive and park-like open spaces.

The nearest public open space areas to the Project Site are Hancock Park and the 20-acre, seven-building LACMA campus located directly west of the Project Site across Curson Avenue.

Impact of Proposed Project on the General Character of the Surrounding Area

The Proposed Project would alter the visual character of the Project Site as it would replace the existing surface parking lot with a 13-story commercial development and a seven-story parking structure. The proposed building would have a visual impact without appropriate landscaping, however the Proposed Project will include new street trees, tree well covers, a landscaped plaza with a potential water feature, outdoor seating, bike racks, and trash receptacles. Furthermore, the Proposed Project would include an enhanced open air entry drive and courtyard with a dedicated office drop off area, upgraded lighting, including a well-lit pedestrian pathway garden/green buffer between the existing Museum Terrace residential complex and the new building, as well as a green wall design to enhance the parking structure façade. Therefore the Project would not introduce incompatible visual elements to the Project Site or in the surrounding area. The proposed 13-story commercial use and parking structure would be

⁴ Emporis Research, *Building Data*, website: <http://www.emporis.com/complex/park-la-brea-apartment-village-los-angeles-ca-usa>, accessed December 21, 2012.

consistent with the general character of the surrounding area and the existing uses in the immediate vicinity of the Project Site and no further analysis of this issue is necessary.

Heights and Massing

The Project proposes the construction of a 13-story, up to 207-foot tall commercial building. With respect to building height and massing, land uses in the immediate vicinity of the Project Site are typically two to 13-story residential buildings and up to 24-story commercial office buildings. Buildings located to the south of the Project Site along Wilshire Boulevard are generally over 10 stories; the existing Museum Square Office building is 11 stories and approximately 176 feet tall⁵, the building located at 5670 Wilshire Boulevard (the California Federal Savings & Loan Building) to the southeast of the Project Site, is 24-stories and approximately 363 feet tall.⁶ The project vicinity is continuously evolving into a denser urban environment with new commercial and multi-family uses of increasing height and density; including the five-story multi-family residential building immediately adjacent to the north of the Project Site. The building heights and massing that would be developed with the implementation of the Proposed Project would create a change in the visual character of the Project Site from what currently exists. However, it would be similar in height and massing compared to the recently developed commercial and residential structures surrounding the Project Site and is consistent with the evolving visual character of the area and the Regional Center land use designation for the area. Moreover, the existing apartment buildings to the north of the Project Site currently abut and are the same height as the existing five-story parking structure on the Project Site. The visual environment for the south-facing units of these buildings is presently dominated by the building mass associated with the parking structure. As such, the addition of two levels to the parking structure, which would occur above the top of these apartment buildings, would not substantially change the visual environment for these uses. No further analysis of this issue is necessary.

Architectural Style and Urban Design

The buildings surrounding the Project Site vary in age and architectural style from more contemporary structures to buildings that were constructed from the 1940's. The Proposed Project's design is a contemporary style that is more compatible with the more contemporary designs that have been incorporated in buildings constructed in the area over the past 20 years. The Proposed Project would include an architectural glass façade which would act to soften the building face while offering a subtle privacy veil that would benefit both the neighboring residential uses and the office tenants. Varying building materials are proposed such as concrete, metal panels, and other such contemporary materials to provide consistency with the recent development that has occurred near the Project Site, in particular the new Broad Contemporary Art Museum and the Resnick Pavilion on the LACMA campus. Roof top mechanical equipment would be screened from adjacent street levels by raised parapet walls. These design features would be consistent with the design of the newer development located south of the Project Site along Wilshire Boulevard and north along 6th Street.

As a result of the building's architectural design and orientation on the Project Site, the Proposed Project would be effectively integrated into the aesthetics of the Project Site and project area by means

⁵ Emporis Research, *Building Data*, website: <http://www.emporis.com/building/museumsquare-losangeles-ca-usa>, accessed December 21, 2012.

⁶ Emporis Research, *Building Data*, website: <http://www.emporis.com/building/5670-wilshire-boulevard-los-angeles-ca-usa>, accessed December 21, 2012

of design, architecture, size, massing, and location. Furthermore, the Proposed Project's location, height, scale, and architectural features are generally compatible with existing and planned development for the Wilshire Community Plan area. Implementation of Project Design Feature AES-1 would ensure that adequate landscaping is provided by the Proposed Project. With the inclusion of adequate landscaping, the impacts of the Proposed Project to the visual character or quality of the site and its surroundings would be less than significant and no further analysis of this issue is necessary.

Project Design Feature

PDF-AES-1 All open areas not used for buildings, driveways, parking areas, or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the City of Los Angeles Department of Planning.

The Proposed Project could potentially create a significant new source of substantial light or glare which would adversely affect day or nighttime views in the area unless mitigation is incorporated. For the purpose of this environmental review, a significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant nighttime illumination impact shall be made considering the following factors:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

The Project Site is located in a well-lit urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights. Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, so that light emanating from any one source contributes to rather than is solely responsible for lighting impacts on a particular receptor. Since development surrounding the Project Site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any notable effect.

The Proposed Project would have the potential to alter lighting patterns in the area of the Project Site as compared with existing uses. Exterior lighting would be wall mounted or ground mounted and would be directed downward and shielded away from adjacent residential uses. Wall-mounted security lighting would remain lit all night at each entrance and/or exit, but would be designed to prevent glare onto the adjacent residential property. Furthermore, the majority of lighting associated with the Proposed Project would be directed internally to the Project Site itself, away from neighboring land uses. Therefore, interior and exterior lights on the Project Site would not shine directly onto light-sensitive uses, and would not result in light trespass. In addition, while the majority of the lighting would be directed towards the interior of the Project Site and would be directed away from neighboring residential land uses, the implementation of Project Design Feature AES-2 would ensure that any new light sources would not create significant lighting impacts on nearby residences. Therefore, impacts associated with illumination would be less than significant and no further analysis of this issue is necessary.

Glare

Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site and exterior building windows. Excessive glare not only restricts visibility, but increases the ambient heat reflectivity in a given area.

Existing sources of glare within the Project Site include the reflection off existing residential buildings and their windows. The exterior portions of the proposed building would utilize various non-reflective material designed to minimize the transmission of glare from buildings. Implementation of Project Design Feature AES-3 would ensure the inclusion of appropriate materials on the exterior of the building while AES-4 would prevent direct glare from automobiles within the parking structure. In addition, the proposed building would incorporate exterior landscaping, as necessary, to reduce potential glare generated by windows and/or glass panels. As such, impacts associated with glare would be less than significant and no further analysis of this issue is necessary.

Project Design Features

PDF-AES-2 Outdoor lighting shall be designed and installed with downcast shielding, so that the light sources are shielded from adjacent properties and light does not fall on adjacent properties.

PDF-AES-3 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and other fabricated wall surfaces designed to minimize glare and reflected heat. At the time of plan check review, building materials shall be reviewed to assure that they do not exceed the reflectivity of standard building materials. If the Applicant should desire to use more reflective materials in locations isolated from major thoroughfares, adequate analysis must be presented to the Department of Building and Safety to determine that the building, due to location, would not cause glare impacts on motorists or nearby population.

PDF-AES-4 Direct glare from automobile headlights in the parking structure shall be shielded by walls, louvers, landscaping, and/or other similar measures.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project in combination with the related projects would result in further infilling of existing urban land uses in the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. While many of the related projects and the Proposed Project would be visible from public and private properties, the combination of the related projects and the Proposed Project is not anticipated to significantly obstruct existing public scenic views in the immediate project vicinity. With respect to potential light/glare or shade/shadow impacts, each related project would be required to determine whether its development would result in impacts to these areas, and mitigation measures would be adopted where necessary. With respect to scenic highways, the Proposed Project would have a less than significant impact to the 'Miracle Mile' corridor in the vicinity of the Proposed Project. In terms of the overall visual quality of the surrounding neighborhoods, each of the related projects would be required to submit a landscape plan and signage plan (if proposed) to the Los Angeles Department of City Planning for review and approval prior to the issuance of grading permits. Additionally, there are no

related projects adjacent to, or in the immediate vicinity of, the Project Site that would result in any cumulative shade and shadow impacts when considered with the development of the Proposed Project. Therefore, cumulative impacts with respect to aesthetics would be less than significant and no further analysis of this issue is necessary.

B. AGRICULTURAL RESOURCES

The proposed project would not 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. The Project Site is fully developed with surface parking lot uses, and is located in a heavily urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.⁷ No impact on farmland or agricultural resources would occur, and no further analysis of this issue is necessary.

The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned [Q]C4-2-CDO and QPB-2 and has a land use designation of Regional Commercial in the Wilshire Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁸ Therefore, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. No impacts would occur, and no further analysis of this issue is necessary.

The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Although not specified in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact may occur if a project were to result in the conversion of land zoned for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

⁷ Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2006, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf>, access January 7, 2013

⁸ Williamson Act Program, California Division of Land Resource Protection, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsizes.pdf, accessed January 7, 2013.

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned [Q]C4-2-CDO and QPB-2 and has a land use designation of Regional Commercial in the Wilshire Community Plan. The Project Site is not zoned as forest land or timberland, and there is no Timberland Production at the Project Site. No impact on forest land or timberland would occur, and no further analysis of this issue is necessary.

The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Although not specified in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

The Project Site is fully developed with surface parking lot and parking structure uses, and is located in a heavily urbanized area of the City of Los Angeles. No forest land exists on or in the vicinity of the Project Site. No impact on forest land would occur, and no further analysis of this issue is necessary.

The Proposed Project would not involve other changes in the existing environment, which due to its location or nature, could result in the conversion of Farmland to non-agricultural use. Although not specified in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact may occur if a project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project Site is fully developed with surface parking lot uses and a parking structure, and is located in a heavily urbanized area of the City of Los Angeles. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the Project Site is not classified in any "Farmland" category designated by the State of California. According to the City General Plan Conservation Element Exhibit B, the Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). No impacts would occur, and no further analysis of this issue is necessary.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.⁹ The Project Site and the related projects are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur and no further analysis of this issue is necessary.

⁹ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf, accessed January 7, 2013.

C. Biological Resources

The Proposed Project would not 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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is currently developed with a surface parking lot and parking structure, is located in a highly urbanized area, and does not contain 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS). In addition, there are no known locally designated natural communities at the Project Site or in the Project vicinity. Therefore, the Project would have no impact on sensitive biological species or habitat, and no further analysis of this issue is necessary.

The Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alternation of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is currently developed with a surface parking lot and parking structure, and is located in a heavily urbanized area of the City of Los Angeles. No riparian or other sensitive habitat areas are

located on or adjacent to the Project Site.¹⁰ Implementation of the project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

However, implementation of the Proposed Project may conflict with the following federal and state regulations.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), first enacted in 1916, prohibits any person unless permitted by regulations, to:

"pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703).

The list of migratory birds includes nearly all bird species native to the United States; non-native species such as European starlings are not included. The statute was extended in 1974 to include parts of birds, as well as eggs and nests. Thus, it is illegal under MBTA to directly kill, or destroy a nest of, nearly any bird species, not just endangered species. Activities that result in removal or destruction of an active nest (a nest with eggs or young being attended by one or more adults) would violate the MBTA. Removal of unoccupied nests, or bird mortality resulting indirectly from a project, is not a violation of the MBTA. Any activity, such as grading or tree removal for construction at the Project Site, which results in destruction of one or more active nests of native birds would entail a violation of the MBTA.

California Fish and Game Code

California Fish and Game Code sections 3503, 3503.5, and 3513 prohibit take of birds and active nests.¹¹ Any activity, such as grading or grubbing for construction of the project site, that results in destruction of one or more active nests of native birds would entail a violation of the Fish and Game Code. Construction activities that result in abandonment of an active bird nest in areas adjacent to the disturbance may also violate sections of the Fish and Game Code.

Though the project site is in an urban setting and is considered to have a moderately low value to wildlife, a number of common and urban-tolerant species probably utilize the project site for foraging. Some species (those adapted to urbanized areas) with high mobility, such as red-tailed hawk (*Buteo jamaicensis*), great horned owl (*Bubo virginianus*), and urban-tolerant songbirds could be expected to utilize the project area on a transitory and sometimes regular basis, depending on environmental factors

¹⁰ *Environmental and Public Facilities Maps: Significant Ecological Areas, Los Angeles City Planning Department, September 1, 1996.*

¹¹ *California Fish and Game code, Chapter 1, General Provisions, sections 3503, 3503.5 and 3513, website: <http://www.socratek.com/StateLaws.aspx?id=867760&title=>, <http://www.socratek.com/StateLaws.aspx?id=867761&title=>, and <http://www.socratek.com/StateLaws.aspx?id=867766&title=>, accessed October 13, 2013.*

present within their primary habitat and their degree of fear of humans and human activities. Urban-tolerant birds utilizing the site may include, but would not be not limited to, American crow (*Corvus brachyrhynchos*), black phoebe (*Sayornis nigricans*), mourning dove (*Zenaida macroura*), and house finch (*Carpodacus mexicanus*). The Project Applicant would be required to comply with the following existing regulations of the U.S. Fish and Wildlife Service and the CDFW related to protection of nesting birds:

Regulatory Compliance Measure:

RC-BIO-1 To avoid impacting nesting birds, special status birds and/or raptors, one of the following must be implemented:

- Conduct vegetation removal and other ground disturbance activities associated with construction during September through January, when birds are not nesting. If feasible, initiate tree removal, vegetation clearing and grading activities prior to the breeding season (generally February 1st through August 31st) and keep disturbance activities constant throughout the spring to prevent birds from establishing nests in surrounding habitat in order to avoid abandonment of eggs or young if nesting establishes prior to construction activities; or
- Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction survey no more than 30 days prior to initiation of tree removal or grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the project site).
- If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFW and implemented to prevent abandonment of the active nest. At a minimum, tree removal and grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 50 feet for songbird nests, 100 feet for special status songbird nests, and 200 to 500 feet for raptor nests, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area.
- A survey report by the qualified biologist verifying that the young have fledged shall be maintained in the project file, and submitted to the City of Los Angeles upon request. The qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

The Proposed Project would not 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. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on biological resources if it could result in:

- The alternation of an existing wetland habitat.

The Project Site is developed with a surface parking lot and parking structure. Review of the National Wetlands Inventory identified no protected wetlands in the project area.¹² Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see discussion above) and no impacts to riparian or wetland habitats would occur with implementation of the Project; no further analysis of this issue is necessary.

The Proposed Project would not 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. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in above, the Project Site is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the project vicinity. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species or native wildlife nursery sites and no further analysis of this issue is necessary.

The Proposed Project could potentially conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands) unless mitigation is incorporated. For the purpose of this environmental review, a project-related significant adverse effect could occur if the project would cause an impact which is inconsistent with local regulations pertaining to biological resources, e.g. the City of Los Angeles Protected Tree Ordinance No. 177,404. In addition to the Protected Tree Ordinance, it is the City's policy that all mature trees (at least eight-inches in diameter at breast height) that are removed at development sites as part of project implementation be replaced at a 1:1 ratio and the removal of any trees in the public right-of-way be approved by the Board of Public Works.

As discussed in above, the Project Site is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. There are no protected trees as defined by the City of Los Angeles Protected Tree Ordinance No. 177,404 (i.e., native oaks [*Quercus sp.*], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay [*Umbellularia californica*]) on the Project Site. The only vegetation on the Project Site consists of the ornamental trees and shrubbery planted throughout the parking lot and along Curson Avenue. There are 50 trees with a trunk diameter greater than eight inches (8") in diameter at breast height (DBH) located in the area of the Project Site that will be redeveloped; all of the trees are ornamental/non-native species. All trees eight inches or more DBH that are removed will need to be replaced on a 1:1 ratio to reduce the biological impact to a less than significant level. With implementation of Regulatory Compliance Measures BIO-2 and BIO-3 and Mitigation Measures BIO-1 and BIO-2, impacts of the Proposed Project would be less than significant and no further analysis of this issue is necessary.

¹² National Wetlands Inventory, U.S. Fish & Wildlife Service, website: <http://www.fws.gov/wetlands/Wetlands-Mapper.html>, accessed January 7, 2013.

Regulatory Compliance Measures:

- RC-BIO-2** Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077.
- RC-BIO-3** All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

Mitigation Measures:

- MM-BIO-1** Prior to the issuance of any permit, a Tree Report shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. The required Tree Report shall include the location, size, type, and condition of all existing trees with an eight-inch or greater DBH, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground.
- MM-BIO-2** All significant (eight-inch or greater DBH, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

The Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? Although not specified in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact would occur if the project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the project and no further analysis of this issue is necessary.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS. No such habitat is expected to occur in the vicinity of the related projects and the Proposed Project due to the existing urban development. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance. Although the Project Site does not contain any protected species trees, there is a possibility that some of the related projects could contain protected species trees. Any removal of protected species trees would be done in accordance with the City of Los Angeles Protected Tree Ordinance. Therefore, cumulative impacts to biological resources would be considered less than significant and no further analysis of this issue is necessary.

D. Geology and Soils

The Proposed Project could potentially expose people or structures to potential substantial adverse effects unless mitigation is incorporated, 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.* Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a Project Site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

The Project Site is located in the seismically active region of southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. However, there are no mapped active or potentially active faults identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, known to be present on or beneath the Project Site.¹³ The distance to the nearest active fault to the site, the Santa Monica Fault, is approximately 2.22 miles (3.6 kilometers) to the northwest. The fault has not been designated with an Earthquake Fault Zone by the California Geological Survey. The distance of this fault from the Project Site indicates that the possibility of surface fault rupture affecting the site would be considered remote.

No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. In addition, the City of Los Angeles Uniform Building Code (UBC), upgraded since the 1994 Northridge Earthquake, contains construction requirements to ensure that habitable structures are built to a level of acceptable seismic risk. In addition, Mitigation Measure GEO-1 would require that the design and construction of the project shall conform to recommendations of the Geotechnical Report and the recommendations of a qualified structural engineer which would identify construction and building requirements. The project would be constructed in conformance with the UBC and the engineer's design recommendations in the Geotechnical Report subject to Department of Building and Safety and Fire Department approval. Therefore, with the implementation of Mitigation Measure GEO-1, impacts related to potential ground rupture would be less than significant and no further analysis of this issue is necessary.

Mitigation Measure

MM-GEO-1 The design and construction of the project shall conform to recommendations of the Geotechnical Report, a qualified structural engineer and all relevant California Building Code and UBC seismic standards as required and approved by the City of Los Angeles Department of Building and Safety.

¹³ *City of Los Angeles Department of Planning, Zone Information and Map Access System, 5701 W. Wilshire Blvd (et al), website: <http://zimas.lacity.org/>, November 28, 2012.*

(ii) *Strong seismic ground shaking.* Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a proposed project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region.

As discussed above, the Proposed Project Site could be subject to strong seismic shaking from regional conditions. However, this impact will be reduced to a less than significant level by following all relevant California Building Code and UBC seismic standards as well as the recommendations of the Geotechnical Report, as required by Mitigation Measure GEO-1, during construction. No further analysis of this issue is necessary

(iii) *Seismic-related ground failure, including liquefaction.* Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project.

According to City of Los Angeles Department of Planning, Zone Information and Map Access System¹⁴, the Site is not located within an area identified as having potential for liquefaction. In addition, according to the City of Los Angeles General Plan, Safety Element (1996)¹⁵, the Site is not located within an area identified as having potential for liquefaction. Further, the Site is not located in an area that is mapped as a potentially liquefiable zone according to the California Department of Mines and Geology (now referred to as the California Geologic Survey) Seismic Hazard Zone Map (CDMG, 1999).

The soils encountered during Site exploration are generally consisted of a thin veneer of fill which overlies natural alluvial deposits consisting of interbedded silts, clays, and sands. The depth to groundwater beneath the subject property is approximately 5-10 feet below ground surface (bgs).¹⁶ While a potable groundwater resource occurs in the Exposition Aquifer that is present at a depth of approximately 125 feet below the ground surface, this resource is not near enough to the surface to be associated with a high risk of liquefaction. As such, the potential for liquefaction of Site soils is very low. Therefore, impacts with respect to potential liquefaction would be less than significant and no further analysis of this issue is necessary.

¹⁴ City of Los Angeles Department of Planning, *Zone Information and Map Access System, 5701 W. Wilshire Blvd (et al)*, website: <http://zimas.lacity.org/>, November 28, 2012.

¹⁵ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Safety Element Exhibit B: Areas Susceptible to Liquefaction in the City of Los Angeles, May 1995*, website: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, accessed January 8, 2013.

¹⁶ *Environmental Site Assessment Phase I and Methane Soil Testing, Proposed Office Development Project, Commercial Property, Portion of APN 5508-015-007, 5711 Wilshire Boulevard, Los Angeles, CA 90036, by California Environmental Geologists and Engineers, dated January 2013, page 11.*

(iv) *Landslides* Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

According to City of Los Angeles Department of Planning, Zone Information and Map Access System, the Site is not located within an area identified as having potential for landslides.¹⁷ In addition, according to the City of Los Angeles General Plan, Safety Element (1996), the Site is not located within an area identified as having potential for landslides.¹⁸ Further, the Site is not located in an area that is mapped as a potential landslide zone according to the California Department of Mines and Geology (now referred to as the California Geologic Survey) Seismic Hazard Zone Map (CDMG, 1999).

The Project Site and surrounding vicinity slope gently to the south. The Project Site is in a densely developed area of the City and there are no known landslides near the site, nor is the site in the path of any known or potential landslides. As the probability of landslides, including seismically induced landslides, is considered to be very low at the Project Site, no impact would occur and no further analysis of this issue is necessary.

The Proposed Project would not result in substantial soil erosion or the loss of topsoil. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. During construction, grading and excavation would expose minimal amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion would not occur. The Project Site is relatively flat and excavation of the Project Site would be limited to that necessary for the installation of foundations and utilities. All grading activities require grading permits and haul route approval from the Los Angeles Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, on-site grading and Site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills.

The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Proposed Project. During construction, the Proposed Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Long-term operation of the Proposed Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structure and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Proposed Project.

¹⁷ ZIMAS, *Op cit.*

¹⁸ *Safety Element, Op cit.*

With implementation of the applicable grading and building permit requirements and the implementation of applicable BMPs, less-than-significant impacts would occur related to erosion or loss of topsoil. No mitigation measures are required and no further analysis of this issue is necessary. Further discussion of erosion as it relates to surface water quality is provided in the discussion of Hydrology and Water Quality.

The Proposed Project may 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 unless mitigation is incorporated. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for proposed buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential were determined to be less than significant based on the analysis presented, above. With respect to lateral spreading, subsidence, or collapse, construction would comply with the City of Los Angeles UBC, which is designed to assure safe construction and includes building foundation requirements appropriate to the conditions present at the Project Site. Additionally, mitigation measure GEO-1 requires that the design and construction of the Project shall conform to recommendations of the Geotechnical Report and a qualified structural engineer. The owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval. The Project would comply with existing regulations, and would implement all site-specific requirements identified in the Geotechnical Report and by a qualified structural engineer. Following implementation of mitigation measure GEO-1, impacts associated with lateral spreading, subsidence, or collapse would be less than significant and no further analysis of this issue is necessary.

The Project may be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), which could create substantial risks to life or property unless mitigation is incorporated. A significant impact may occur if the project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard 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 soils encountered during Site exploration generally consisted of a thin veneer of fill which overlies natural alluvial deposits consisting of interbedded silts, clays, and sands. The depth to groundwater beneath the subject property is approximately 5-10 feet bgs.¹⁹ However, construction of the Proposed Project would be required to comply with the City of Los Angeles UBC and the 2007 California Building Code, which include building foundation requirements appropriate to site-specific conditions. The UBC mandates that special foundation design consideration be employed if the Expansion Index is 20, or greater (UBC Table 18-1-B). As required by mitigation measure GEO-1, the design and construction of the Project shall conform to recommendations of the Geotechnical Report. Further, structural systems would be designed by a qualified structural engineer which would identify appropriate foundation systems such as drilled pier and gradebeam systems or driven piles and structural gradebeam systems should Site soils be found to have an Expansion Index of 20 or greater. With compliance with existing regulations and implementation of all site-specific requirements

¹⁹ Phase I ESA, *Op cit.*

identified in the Geotechnical Report, impacts associated with expansive soils would be less than significant and no further analysis of this issue is necessary.

The Project would not 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. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. Furthermore, no septic tanks or alternative disposal systems are necessary, nor are they proposed with the Project. Therefore, no impact would occur and no further analysis of this issue is necessary.

Cumulative Impacts

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and any related projects. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that Project impacts would be less than significant. Therefore, the Proposed Project would not contribute to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant and no further analysis of this issue is necessary.

E. Hydrology and Water Quality

The Proposed Project would not violate any water quality standards or waste discharge requirements. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The Los Angeles Regional Water Quality Control Board (LARWQCB) originally issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001²⁰, that requires new development and redevelopment projects to incorporate storm water mitigation measures. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that "results in the creation, addition, or replacement of 5,000 sf or more of impervious surface area on an already

²⁰ Also known as an MS4 Discharge Permit, the Permit was amended and updated most recently by Final Order No. R4-2012-0175 on December 10, 2012. Website: http://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/la_ms4/2012/Order%20R4-2012-0175%20-%20A%20Final%20Order%20revised.pdf accessed April 16, 2013.

developed site.”²¹ Depending on the type of project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. Site Specific Mitigation Plans are required for the following uses:

- Single-Family Hillside Residences over one acre
- Housing developments (including single-family homes, multi-family homes, condominiums, and apartments) of ten or more units
- Industrial/Commercial developments of one acre or more of impervious surface area
- Automotive service facilities (SIC 5013, 5014, 5541, 7532-7534, and 7536-7539)
- Retail gasoline outlets
- Restaurants (SIC 5812)
- Parking lots with 5,000 square feet or more of surface area, including accessory driveways, or with 25 or more parking spaces
- Projects located in, adjacent to, or discharging directly to a designated Environmentally Sensitive Area (ESA)

The Proposed Project would not involve any of these uses. Therefore, the Proposed Project would not be required to implement a Site Specific Mitigation Plan.

The Proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe).

The City’s Stormwater Low Impact Development (LID) Ordinance was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit, with limited exceptions. The Ordinance requires adherence to the requirements listed in the 4th Edition of the Development Best Management Practices Handbook – Part B. As a redevelopment project, the Proposed Project would be required to comply with section 3.1.3, which requires that a LID Plan be prepared that includes the following provisions:

1. Stormwater runoff will be infiltrated, evapotranspired, captured and used, and/or treated through high removal efficiency Best Management Practices onsite, through stormwater management techniques as identified in the 4th Edition of the Development Best Management Practices Handbook – Part B, Section 4.1. The onsite stormwater management techniques must be properly sized, at a minimum, to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the site to the maximum extent feasible, for at least the volume of water produced by the water quality design storm event that results from:
 - The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area using a 48 to 72-hour drawdown time, from the formula

²¹ *Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (SUSMP)*. Los Angeles County Department of Public Works. September 2002 website: http://dpw.lacounty.gov/wmd/npdes/SUSMP_MANUAL.pdf, accessed April 16, 2013.

recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998); or

- The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the California Stormwater Best Management Practices Handbook – Industrial/Commercial, (2003); or
 - The volume of runoff produced from a 0.75 inch storm event.
2. Pollutants shall be prevented from leaving the development site for a water quality design storm event as defined above unless it has been treated through an onsite high removal efficiency biofiltration/biotreatment system.
 3. Hydromodification impacts shall be minimized to natural drainage systems.

Following the implementation of the LID Plan, impacts to water quality standards or waste discharge requirements would be less than significant and no further analysis of this issue is necessary.

The Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
 - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;
 - Reduce yields of adjacent wells or well fields (public or private); or
 - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

As previously discussed, the depth to perched groundwater²² beneath the Project Site is approximately 5-10 feet bgs. While a potable groundwater resource occurs in the Exposition Aquifer that is present at a depth of approximately 125 feet below the ground surface, because of the natural alluvial deposits consisting of interbedded silts, clays, and sands that underlie the property and the current level for development which covers nearly 90% of the Proposed Project Site, existing groundwater recharge from the Project Site is considered to be negligible. Further, no groundwater production wells are located

²² *Perched groundwater is an isolated body of groundwater that is resting above and separated from the main water table by an 'aquiclude', i.e., an impermeable body of rock or stratum of sediment that acts as a barrier to the flow of groundwater. websites, http://www.superglossary.com/Definition/Geology/Perched_Groundwater.html & <http://www.thefreedictionary.com/aquiclude> , accessed April 19, 2013.*

within one mile of the property.²³ Due to the proximity of perched groundwater, dewatering may be required during Project construction. However, because dewatering would only occur temporarily, as needed during construction, no long-term impacts are anticipated and no further analysis of this issue is necessary.

Construction of the Proposed Project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Report and by a qualified structural engineer (as required by Mitigation Measure GEO-1), and implementation of an approved LID Plan, impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant. No further analysis of this issue is necessary.

The Proposed Project would not 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. A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. As stated previously, the Project Site is almost entirely covered by impervious surfaces and most of the runoff flows to the local stormdrain system during a storm event. As noted, the Proposed Project would not increase the amount of impervious surfaces at the site, the amount of runoff from the site would not substantially change, and all the runoff associated with the Proposed Project would be either directed to landscaped areas or directed to the existing stormdrain system and would not encounter unprotected soils. During project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to stringent controls imposed via an approved LID Plan as discussed above. As such, any alteration of the existing drainage pattern would not result in substantial erosion or siltation on- or off-site and project impacts related to this issue would be less than significant. No mitigation measures are required and no further analysis of this issue is necessary.

The Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on surface water hydrology if it would:

- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

The Project Site is located in a highly urbanized area and is served by existing City storm drain infrastructure. The Project Site, under current conditions, is almost entirely covered with impermeable surfaces. Furthermore, the Project Site is not located adjacent to any stream or river, and project runoff would continue to drain into existing City storm drain infrastructure, particularly in light of the implementation of an approved LID Plan. Therefore, the Proposed Project would not have the potential

²³ *Environmental Site Assessment Phase I and Methane Soil Testing, Proposed Office Development Project, Commercial Property, Portion of APN 5508-015-007, 5711 Wilshire Boulevard, Los Angeles, CA 90036, by California Environmental Geologists and Engineers, dated January 2013, page 11.*

to result in flooding due to altered drainage patterns and impacts would be less than significant. No mitigation measures are required and no further analysis of this issue is necessary.

The Proposed Project would not 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. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the project site were to increase to a level which exceeds the capacity of the storm drain system serving the project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Proposed Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, also sometimes called Best Management Practices (BMPs), can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the City of Los Angeles Stormwater Management Program. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level. No further analysis of this issue is necessary.

Operation-Related Project Impacts

Activities associated with operation of the Proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Proposed Project must comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB and the Proposed Project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the Proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial

additional sources of polluted runoff impacts to a less than significant level and no further analysis of this issue is necessary.

The Proposed Project would not otherwise substantially degrade water quality. Although not specified in the City of Los Angeles LA CEQA Thresholds Guide 2006, a significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Other than the sources discussed above, as described in Sections 8(a) and 8(e), the project does not include other potential sources of contaminants which could potentially degrade water quality. Therefore, the project would not degrade water quality. No impact would occur and no further analysis of this issue is necessary.

The Proposed Project would not 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. This question would apply to the project only if it were placing housing in a 100-year flood zone.

The Proposed Project does not include any housing; further, Project Site is not in an area designated as a 100-year flood hazard area.²⁴ Therefore, the Project would not have risks of flooding. No impact would occur and no further analysis of this issue is necessary.

The Proposed Project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows. Although not specified in the City of Los Angeles LA CEQA Thresholds Guide 2006, a significant impact may occur if the project was located within a 100-year flood zone, which would impede or redirect flood flows.

The Project Site is not in an area designated as a 100-year flood hazard area.²⁵ The Project Site is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is necessary.

The Proposed Project would not 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. Although not specified in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

The Project Site is not located within a potential inundation area.²⁶ As such, there would be no impacts related to potential inundation from the failure of a levee or dam and no further analysis of this issue is necessary.

²⁴ City of Los Angeles Bureau of Engineering, *Navigate LA*, website: http://navigatea.lacity.org/common/mapgallery/pdf/la_flood_haz_map.pdf, Accessed January 8, 2013

²⁵ *Navigate LA*, Op cit.

The Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. Although not specified in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project Site is located at least 11 miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. Furthermore, the Project Site is located in the highly urbanized Wilshire Center community of the City, where little open space exists. Therefore, the potential for mudflows to impact the Project Site would also be highly unlikely. As such, there would be no impacts related to risk of loss, injury, or death by seiche, tsunami, or mudflow and no further analysis of this issue is necessary.

Cumulative Impacts

Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding area are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. It is very likely that portions of the related project sites, similar to the project site, contain a modest amount of pervious surface area. Therefore, standard development and redevelopment would likely increase the amount of impervious surface area, which would increase the amount of runoff. However, because all such projects will have to comply with LID or SUSMP, it may lead to an increase in the amount of pervious surface area and that would lead to a cumulative decrease in the amount of surface runoff.

Similar to the Proposed Project, all the runoff associated with the related projects would either be directed to landscaped areas or directed to an existing stormdrain system and would not encounter unprotected soils. The related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain. Therefore, cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. In addition, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program and/or the City of Los Angeles LID Program. Therefore, cumulative water quality and flooding impacts would be less than significant and no further analysis of this issue is necessary.

F. Land Use Planning

The project would not conflict with any applicable habitat conservation plan or natural community conservation plan. As discussed in Biological Resources (above), no habitat conservation or natural community conservation plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in an area which has been previously developed with commercial uses, and is also

²⁶ *City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed January 8, 2013.*

within a heavily urbanized area of Los Angeles. Therefore, the Proposed Project would not have the potential to cause such conflicts, and no impact would occur. No further analysis of this issue is necessary.

G. Mineral Resources

The project site is not located within an area used or available for extraction of a regionally important mineral resource, and the proposed project would not convert an existing or future regionally important mineral extraction use to another use or affect access to a site used or potentially available for regionally-important mineral resource extraction. Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide 2006*, a significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is currently developed with a surface parking lot and parking structure. The State of California Division of Oil, Gas and Geothermal Resources (DOGGR) online mapping systems indicates the Project Site is within the boundary of the Salt Lake Oil Field. DOGGR Map No. 118 indicates that the Project Site is located within the southern portion of the Salt Lake Oil Field. Most of the wells within the Salt Lake Oil Field have been abandoned. There are no active oil wells nearby the Project Site. The nearest oil well to the Project Site is the abandoned well, Chevron “Salt Lake 406” located on an offsite property, approximately 400 feet to the northeast. Numerous abandoned oil wells are located beneath the Park La Brea development, north of the property in the vicinity of 6th Street.²⁷ According to the City General Plan Conservation Element Exhibit A, the Project Site is not located near or in any mineral resources zone. Further, according to the State Mining and Geology Board *Guidelines for Classification and Designation of Mineral Lands*, under criteria for determining which MRZ-2a and MRZ-2b areas or parts of MRZ-2a and MRZ-2b areas are suitable as mineral resource areas, the Project Site would qualify for exclusion under category I.B. Economic Exclusion, Commercial Area with land improvements (building).²⁸ The Proposed Project would not result in the permanent loss of, or loss of access to, a mineral resource. Therefore, no impacts would occur in association with the Project. No further analysis of this issue is necessary.

²⁷ *Environmental Site Assessment Phase I and Methane Soil Testing, Proposed Office Development Project, Commercial Property, Portion of APN 5508-015-007, 5711 Wilshire Boulevard, Los Angeles, CA 90036, by California Environmental Geologists and Engineers, dated January 2013.*

²⁸ *State Mining and Geology Board Guidelines for Classification and Designation of Mineral Lands, page 7, website: <http://www.consrv.ca.gov/SMGB/Guidelines/ClassDesig.pdf>, accessed January 6, 2014.*

The Project Site is not located in an area used or available for extraction of a locally-important mineral resource, and the proposed project would not convert an existing or future locally-important mineral extraction use to another use or affect access to a site used or potentially available for locally-important mineral resource extraction. Although not specified in the City of Los Angeles LA CEQA Thresholds Guide 2006, a significant impact may occur if the project site is located in an area used or available for extraction of a locally-important mineral resource, or if the project development would convert an existing or future locally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for locally-important mineral resource extraction. According to the City of Los Angeles L.A. CEQA Thresholds Guide 2006, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

Because the Project Site is subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. The Project Site is not zoned for oil extraction and drilling or mining of mineral resources, and there are no such sites at the Project Site.

The Project would involve the development of a commercial building and additions to an associated parking structure, and would not involve any new oil or mineral extraction activities. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, no impact associated with mineral resources would occur and no further analysis of this issue is necessary.

Cumulative Impacts

As discussed above, the Proposed Project would have no impact on mineral resources. It is not known if any related projects would result in the loss of availability of known mineral resources. Regardless, because the Proposed Project would have no incremental contribution to the potential cumulative impact on mineral resources, the Proposed Project would have no cumulative impact on such resources. No further analysis of this issue is necessary.

H. Noise

The Proposed Project is not 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; therefore, the Proposed Project would not expose people residing or working in the project area to excessive noise levels. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater.

The closest public airports to the Project Site are the Burbank Airport and the Los Angeles International Airport (LAX). However, the Project Site is not located within two miles of a public airport and furthermore, the Project Site is not in an airport land use plan area.²⁹ Therefore, no impact would occur and no further analysis of this issue is necessary.

The Proposed Project Site is not within the vicinity of a private airstrip, therefore, the Proposed Project would not expose people residing or working in the project area to excessive noise levels. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater. This question would apply to a project only if the project site were in the vicinity of a private airstrip and would subject area residents and workers to substantial noise levels from aircraft operations.

The Project Site is not located in the vicinity of a private airstrip. No such facilities are located in the vicinity of the Project Site, and as such, no impact would occur. No further analysis of this issue is necessary.

I. Population and Housing

The proposed project would not locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. A significant impact may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. As part of its comprehensive planning process for the Southern California region, the SCAG has divided its jurisdiction into 14 subregions. According to the 2010 Decennial Census, the City of Los Angeles had a permanent population of 3,792,621 persons and approximately 1,318,168 residences.³⁰ By the year 2020, SCAG forecasts an increase to 3,991,700 persons, a 5.2 percent increase, and 1,455,700 residences, a 10.4 percent increase.³¹ Because population and housing impacts are most importantly recognized at the local level, analyzing housing and population characteristics by Community Plan Area (CPA) can be a more accurate method of predicting potential impacts. The Project Site is located within the Wilshire CPA. The Proposed Project's impacts with respect to population and housing are discussed below.

Population

The construction of the Proposed Project would not include any residential uses. As such, the Proposed Project would not introduce permanent residents to the Wilshire CPA. Therefore, the Project would

²⁹ ZIMAS, *Op cit.*

³⁰ US Census Bureau, 2010 Census, website: <http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>, accessed December 4, 2013.

³¹ SCAG, *Adopted 2012 RTP Growth Forecast, by City*, website: <http://www.scag.ca.gov/forecast/index.htm>, accessed January 8, 2013.

have no direct impact on population growth. No mitigation measures are required and no further analysis of this issue in an environmental impact report is necessary.

The construction of the Proposed Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. Project-related construction workers would not be likely to relocate their household's place of residence as a consequence of working on the Proposed Project and, therefore, no permanent residents would be generated as a result of the construction of the Proposed Project.

The commercial component of the Proposed Project would generate approximately 873 jobs.³² While new employment opportunities would be created with the project, most of the expected employees would be drawn from the existing labor force in the region and would not need to relocate or place a demand for housing in the area. It is possible that some of the future employees would become permanent residents in the area; however, it is unlikely that this growth would be substantial in the context of the growth forecasted for the City of Los Angeles or the Wilshire CPA. Thus, any impacts on area population growth would be less than significant. No mitigation measures are required and no further analysis of this issue is necessary.

Housing

The Proposed Project does not include a residential component and there are no existing residential uses on the Project Site that would be demolished as part of the Project; therefore, the Proposed Project would not exceed any housing projections for the region, city, or CPA. Therefore, no impact would occur with respect to housing projections. No mitigation measures are required and no further analysis of this issue is necessary.

The proposed project would not result in the displacement of existing residents, necessitating the construction of replacement housing elsewhere. A significant impact may occur if a project would result in the displacement of existing residents, necessitating the construction of replacement housing elsewhere. Based on the existing on-site uses, no people currently reside on the Project Site. Therefore, no people would be displaced by the Proposed Project and no impact would occur. No mitigation measures are required and no further analysis of this issue is necessary.

Cumulative Impacts

Less Than Significant Impact. As discussed above, the Proposed Project would not result in any significant impacts to population growth or housing. Regardless of any potential impacts that could occur as a result of development of the related projects, the Proposed Project would not contribute to any cumulative impacts related to population and housing. No mitigation measures are required and no further analysis of this issue is necessary.

³² Assumes 3.4965 employees per 1,000 sf of office uses. Source: School Fee Justification Studies for Los Angeles Unified School District, September 2002.

J. Public Services

The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

(i) *Fire protection*

Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The Proposed Project site is within the service area of LAFD Battalion 18, which covers the communities of Palms, Cheviot Hills, South Robertson, South Carthay, West Los Angeles, Park La Brea, Fairfax, Miracle Mile, west Hancock Park, Mid-City, Lafayette Square, Century City, Rancho Park, the Crenshaw District and Baldwin Hills. There are six fire stations: Fire Station 43, Fire Station 58, Fire Station 61, Fire Station 68, Fire Station 92 and Fire Station 94 under the direction of Battalion 18.

The Proposed Project is approximately 0.8 miles from Fire Station No. 61, located at 5821 W. Third Street in the Fairfax Area. The station also serves as the headquarters for Battalion 18. Fire Station No. 61 has an Engine and Task Force Truck Company, two paramedic rescue ambulances, and a staff of 14. Fire Station No. 29, which is under the command of Battalion 11, is approximately 2.3 miles from the Project Site, located at 4029 Wilshire Boulevard. Fire Station No. 29 is equipped with an Engine and two Trucks, two paramedic rescue ambulances, and a staff of 14.³³

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for fire flow to the Project Site. Fire flows are supplied by the same water mains as the domestic water systems including the lines located in the local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.³⁴ Requirements for fire hydrant spacing

³³ *Written (via email) correspondence from Captain Luke Milick, Los Angeles Fire Department, February 14, 2013.*

³⁴ *LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.07, Proposed Table 9C.*

and type of hydrant also vary by type of land development. Pursuant to Section 57.09.06(B) of the LAMC, hydrants in high-density commercial locations such as the Project must serve a net land area of 40,000 square feet. Additionally, there must be a distance of 300 feet between hydrants on roads and fire lanes and 4" x 4" double fire hydrants must be used.

Water for fire flows for the area surrounding the Project Site is also provided by the LADWP. All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. See Section IV.A.M. (Utilities – Water) below, for a discussion of water service infrastructure in the Project area.

The Proposed Project would include the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to an existing five-level parking structure. While building plans are still in the preliminary phase, in order to minimize the potential demand for LAFD services, the design of the Proposed Project would include the following:

- The Proposed Project would comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design would incorporate the standards and requirements as set forth by: Title 24, the City of Los Angeles Safety Element, the LAMC Fire Code, and any additional code requirements established by the LAFD relative to fire prevention, safety, suppression, and emergency access and response.
- LAFD would approve a plot plan concerning access and hydrants. The plot plan would include fire prevention and access features to the satisfaction of the LAFD which may include the following standard requirements:
 - Access for Fire Department apparatus and personnel to and into all structures shall be required.
 - Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance or to the satisfaction of the LAFD.
 - Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
 - All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
 - All structures shall be fully sprinklered pursuant to LAMC Section 57.09.07(A).
 - No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

As per Section 57.09.07A of the LAMC, the LAFD has a fire station within 1.5 miles (0.8 miles), which houses a truck and engine company. The LAFD has stated that there are no special concerns related to the Proposed Project.³⁵ Therefore, since the LAFD could adequately serve the project without the

³⁵ *Written (via email) correspondence from Captain Luke Milick, Los Angeles Fire Department, February 14, 2013.*

addition of a new or expanded station, the impact related to fire protection would be less than significant. No further analysis of this issue is necessary

Cumulative Impacts

The Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. On this basis, it is expected that cumulative impacts on fire protection would be less than significant and no further analysis of this issue is necessary.

(ii) Police protection

Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

The LAPD Wilshire Community Police Station serves the Project Site under the jurisdiction of the West Bureau which serves the communities of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Park, Harvard Heights, Larchmont Village, Little Ethiopia, Mid-City, Mid-Wilshire, Miracle Mile, Olympic Park, Park La Brea, South Carthay, Wellington Square, Western Heights, Wilshire Center, Wilshire Vista, Windsor Square.³⁶ The Wilshire Community Police Station is located at 4861 West Venice Boulevard, approximately 1.3 miles southeast of the Project Site.

The Proposed Project would include the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to an existing five-level parking structure. The Proposed Project would incorporate crime

³⁶ Los Angeles Police Department website: http://www.lapdonline.org/wilshire_community_police_station, Accessed April 16, 2013.

prevention measures into Project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional lighting to enhance public safety. The Proposed Project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments. Closed circuit television (CCTV) cameras would be mounted on the building exterior that would record activity on the property. Similar to current operations in the existing Museum Square office complex, a security/check-in desk would be located in the lobby of the new office building; security personnel would also be present after normal business hours. Additionally, the Proposed Project may undergo plan review by the LAPD as part of the LADBS plan check process and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand police protection services. Given the already highly urbanized nature of the surrounding area, development of the Proposed Project is not expected to require the construction of a new or expanded police station. Therefore, the impact related to police protection would be less than significant and no further analysis of this issue is necessary.

Cumulative Impacts

The Proposed Project, in combination with the related projects, would increase the demand for police protection services in the project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects may be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. Therefore, a less-than-significant cumulative impact on police protection services would occur and no further analysis of this issue is necessary.

(iii) Schools

A significant impact may occur if a Proposed Project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site. The Proposed Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs.

The Proposed Project would redevelop an existing commercial site in a highly urbanized area in the Miracle Mile district. The Proposed Project would not generate any permanent residents. The approximately 873 people that would be employed by the project's 249,500 square foot commercial uses are not anticipated to generate significant numbers of new students that would be introduced to project area schools. Using figures from the LAUSD Commercial/Industrial Development School Fee Justification Study completed in September 2002, it is estimated that the project commercial uses would generate a total of 23 students throughout the City of Los Angeles, of which approximately four would be elementary students (based on 0.0156 students per 1,000 square feet of commercial use), two would be a middle school student (based on 0.0070 students per 1,000 square feet of commercial use), and 17 would be high school students (based on 0.067 students per 1,000 square feet of commercial use). As such, the Proposed Project would not exceed the capacity of any existing or proposed schools. Furthermore, although the Proposed Project's impact to schools would be less than significant, the

payment of school fees in conformance with SB 50 would be mandatory, and therefore no impact would occur with respect to schools. No further analysis of this issue is necessary.

Cumulative Impacts

The Proposed Project would not generate any new permanent residents who would introduce new students into project area schools, but the Proposed Project's commercial use may generate approximately 23 new students. As a result of the development of the project in combination with the related projects, it is anticipated that a cumulative increase in the demand for school services would occur. The evaluation of related project's impacts on schools would be conducted on a project-by-project basis in conjunction with each individual project proposal. It is likely that the small number of students generated by the Proposed Project's commercial use, as well as some of the students generated by the related projects, would already reside in areas served by the LAUSD and be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all the students generated by the Proposed Project commercial use and the related projects would be new to the LAUSD.

Additional schools are being constructed in the Project area. However, there is no excess capacity to house the projected student enrollment and the construction of the new schools may not alleviate overcrowding. Therefore, to be conservative, it is concluded that the LAUSD schools that would serve the Proposed Project and the related projects would operate over capacities with cumulative student generation, and new or expanded schools could be needed. However, as mandated by state law, the Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees which a developer may be required to pay to mitigate a project's impact on school facilities. As such, the applicants of the related projects, in addition to the Proposed Project, would be required to pay a school fee to the LAUSD to help reduce cumulative impacts on school services. Compliance with the provisions of SB 50 is deemed to provide full and complete mitigation of school facilities impacts. The Proposed Project as well as the related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels. No further analysis of this issue is necessary

(iv) Parks

A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The City of Los Angeles Department of Recreation and Parks manages all municipally owned and operated recreation and park facilities within the City. Within the Wilshire CPA, there are approximately 39 acres of neighborhood, community, and regional parks (not including the 20-acre, seven-building LACMA campus and Hancock Park).³⁷

The following parks are located within a two-mile radius of the Proposed Project:

³⁷ *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Table R-1: City Parks in each CPA, January 19, 1995, page 2.14-3, website: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI R2.14.pdf, accessed January 14, 2013*

- LACMA Campus and Hancock Park, 5801 Wilshire Boulevard;
- Pan Pacific Park, 7600 Beverly Boulevard;
- Carthay Circle Park, 6356 Commodore Sloat Drive;
- Harold A. Henry Park, 4332 West 9th Street;
- LA High Memorial Park, 4625 West Olympic Boulevard;
- Wilshire Green Park, 701-799 Courtyard Place

The following recreation centers are located within a two-mile radius of the Proposed Project:³⁸

- Pan Pacific Recreation Center, 7600 Beverly Boulevard;
- Queen Anne Recreation Center, 1240 West Boulevard;
- Fairfax Senior Center, 7929 Melrose Avenue; and
- Claude Pepper Senior Center, 1762 S. La Cienega Boulevard.

In general, employees of commercial sites are less likely to patronize parks during working hours as they are more likely to use parks and recreational facilities near their homes during non-work hours. The Proposed Project would not introduce any permanent residents to the Project area. As such, the Project would not be anticipated to increase the demand for parks in the vicinity. Therefore, no impact would occur with respect to demand for parks. No mitigation measures are required and no further analysis of this issue is necessary.

Cumulative Impacts

As discussed above, the Proposed Project would not generate any permanent residents that would increase demand for parkland in the project area. As such, the Proposed Project would not have the potential to combine with the related projects to increase the demand for parks in the Project area. With respect to the related projects, the evaluation of impacts to parks would be conducted on a project-by-project basis in conjunction with the development proposals for each project. However, it is anticipated that the related residential projects would be required to dedicate onsite parkland and/or pay Quimby or Parkland Fees to alleviate their impacts to parks, which would generally reduce impacts to a less than significant level. Therefore, the Proposed Project would not combine with the related projects to create a cumulatively considerable impact to parks or recreational facilities, and the cumulative park impacts would be less than significant. No further analysis of this issue is necessary

(v) Other public facilities (including roads)

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the project site, necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The impact of a project on library

³⁸ City of Los Angeles Department of Parks and Recreation, Center Locator, website: <http://routemap.lacity.org/rp/rp.htm>, accessed January 14, 2013.

services is based mainly on the future residential population that would be served by the library. The project area is served by the Los Angeles Public Library's Fairfax Branch Library, located at 161 S. Gardner Street, approximately 0.6 miles north of the Project Site.³⁹ This branch is within the City's standard two-mile radius of the Project Site.⁴⁰ The Proposed Project, which would provide approximately 249,500 square feet of commercial uses, would not introduce any permanent residents to the Project area, and as such, would not be anticipated to increase the demand for library facilities in the vicinity; in general, employees of commercial sites are less likely to patronize libraries during working hours, as they are more likely to use library facilities near their homes during non-work hours. Therefore, no impact would occur with respect to library demand. No mitigation measures are required and no further analysis of this issue is necessary.

Cumulative Impacts

As discussed above, the Proposed Project would not generate any permanent residents that would increase library demands in the project area. As such, the Proposed Project would not have the potential to combine with the related projects to increase the demand for library facilities in the Project area. With respect to the related projects, the evaluation of impacts to libraries would be conducted on a project-by-project basis in conjunction with the development proposals for each project, and mitigation measures required would be implemented to reduce any potentially significant impacts. As the Proposed Project would not combine with residential related projects to create a cumulative demand for library facilities in the Project area, cumulative library impacts would be less than significant. No further analysis of this issue is necessary.

K. Recreation

The Proposed Project would not 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. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities.

The Proposed Project would provide approximately 249,500 square feet of commercial uses. As such, the Proposed Project would not introduce permanent residents to the Project area. Therefore, the Proposed Project would not increase the use or deterioration of parks and recreational facilities in the vicinity, and no impact would occur with respect to the deterioration of park or recreational facilities. No additional mitigation measures would be required and no further analysis of this issue is necessary.

The Proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. A significant

³⁹ City of Los Angeles Public Library, Branch Libraries: Fairfax Branch Library, website: <http://www.lapl.org/branches/11.html>, accessed January 14, 2013.

⁴⁰ City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Figure L-1, page 2.13-8, January 1995, website: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI R2.13.pdf, accessed January 14, 2013.

impact may occur if a project includes the construction or expansion of park facilities, the construction of which would have a significant adverse effect on the environment.

The Proposed Project would provide approximately 249,500 square feet of commercial uses. As such, the Proposed Project would not introduce permanent residents to the project area and the Proposed Project would not increase the demand for park and recreational facilities in the vicinity. Furthermore, the Proposed Project does not include nor would it necessitate a park or recreational facility component, the construction of which could have an adverse environmental impact. Therefore, no impact would occur with respect to the construction or expansion of recreational facilities. No mitigation measures would be required and no further analysis of this issue is necessary.

Cumulative Impacts

As analyzed in the cumulative impact section of (iv) Parks, above, the Proposed Project would not generate any permanent residents that would necessitate parkland or recreational facilities in the Project area. As such, the Proposed Project would not have the potential to combine with the related projects to increase the demand for parks or recreational facilities in the Project area. With respect to the related projects, the evaluation of impacts on recreational facilities would be conducted on a project-by-project basis in conjunction with the development proposals for each project. However, it is anticipated that the related residential projects would be required to dedicate onsite parkland and/or pay Quimby or Parkland Fees to alleviate their impacts to parks and recreational facilities, which would generally reduce impacts to a less than significant level. As the Proposed Project would not combine with residential related projects to create a cumulative demand for new, or deterioration of existing recreational facilities in the project area, cumulative recreational facility impacts would be less than significant. No further analysis of this issue is necessary.

L. Transportation / Traffic

The Proposed Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. This question would apply to the project only if it involved an aviation-related use or would influence changes to existing flight paths.

The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin.

The Project proposes the construction of a 13-story, up to 207-foot tall commercial building. The Code of Federal Regulations (“CFR”) Title 14 Part 77.9 states that any person/organization who intends to sponsor any construction or alteration exceeding 200 feet above ground level must notify the Administrator of the Federal Aviation Administration (“FAA”). However, section 77.9 (e) (1) further states that a project does not need to file a notice for construction or alteration of “any object that will be shielded by existing structures of a permanent and substantial nature or by natural terrain or topographic features of equal or greater height, and will be located in the congested area of a city, town, or settlement where the shielded structure will not adversely affect safety in air navigation”. Buildings located to the south of the Project Site along Wilshire Boulevard are generally over 10 stories;

the existing Museum Square Office building is 11 stories and approximately 176 feet tall⁴¹, the building located at 5670 Wilshire Boulevard (the California Federal Savings & Loan Building) to the southeast of the Project Site, is 24-stories and approximately 363 feet tall.⁴² Therefore, the Proposed Project would not be subject to this filing requirement.

No impacts would occur and no further analysis of this issue is necessary.

The Proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). For the purpose of this analysis, a significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

Vehicular access to the parking structure will be via two driveways with full movement access on both Curson Avenue and Masselin Avenue. Driveway location and design will be subject to LADOT approval at the time of building permit issuance which will ensure that City standards regarding sight lines and turning movements that provide for safe access for the project and surrounding uses are implemented. Therefore, Project driveways would not substantially increase hazards due to a design feature and impacts would be less than significant. No further analysis of this issue is necessary.

M. Utilities and Service Systems

The Proposed Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. For the purpose of this analysis, a significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a National Pollutant Discharge Elimination System (NPDES) permit that ensures compliance with wastewater treatment and discharge requirements.

The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the Project area. The Project will convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility, and, therefore, is subject to the state's wastewater treatment requirements. As such, wastewater from the Project Site is treated according to the wastewater treatment requirements enforced by the RWQCB, and no impact would occur. No further analysis of this issue is necessary.

⁴¹ Emporis Research, Building Data, website: <http://www.emporis.com/building/museumsquare-losangeles-ca-usa>, accessed December 21, 2012.

⁴² Emporis Research, Building Data, website: <http://www.emporis.com/building/5670-wilshire-boulevard-los-angeles-ca-usa>, accessed December 21, 2012

The Proposed Project would not 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. For the purpose of this analysis, a significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

Water Treatment Facilities and Existing Infrastructure

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the project site. The LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved.

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP

has a remaining capacity of approximately 50 to 150 mgd, depending on the season.⁴³ As shown in Table IV.A-1 (Estimated Average Daily Water Demand for the Proposed Project), the Proposed Project would consume a total of approximately 39,834 gallons per day (gpd) or 0.04 mgd of water. Consequently, implementation of the Proposed Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. Therefore, with respect to water treatment facilities, impacts would be less than significant. No further analysis of this issue is necessary.

In addition to supplying water for domestic uses, the LADWP also supplies water for fire protection services, in accordance with Fire Code. The LAFD requires a water flow of 6,000-9,000 gpm flowing from four fire hydrants simultaneously for commercial development. Pursuant to the LADWP and the Los Angeles Department of Building and Safety ("LADBS") requirements, a Service Advisory Request ("SAR") for a hydraulic analysis will be required to determine if existing LADWP water supply facilities can meet the fire flow requirements for the Proposed Project.

The Project Site is served by existing water lines maintained by LADWP. There are currently no water service problems or deficiencies in the project area. However, if water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant. No further analysis of this issue is necessary.

As shown on Table IV.A-1 (Estimated Average Daily Water Demand for the Proposed Project), the average daily water demand for the Proposed Project is estimated to be approximately 39,834 gpd. The Proposed Project would be within the growth projections of the LADWP and it is, therefore, anticipated that the LADWP would be able to meet the Proposed Project's water demand. However, if water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed either by the applicant or by LADWP, and a disruption in service may occur. In addition, proper notification to LADWP customers would take place if a disruption in water service were to occur. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant. No further analysis of this issue is necessary.

⁴³ *Los Angeles Department of Water and Power, Urban Water Management Plan website:*
<http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

Table IV.A-1
Estimated Average Daily Water Demand for the Proposed Project

Land Use	Size	Consumption Rate ^a	Total Consumption (gpd)
Commercial Office	249,500 sf	144 gpd/1,000 sf	35,928 gpd
Parking	162,768	24 gpd/1,000 sf	3,906 gpd
Total Water Consumption			39,834 gpd
Notes: gpd = gallons per day sf = square feet			
^a L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12, Water consumption is assumed to be 120% of wastewater generation.			

Furthermore, the Proposed Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. The LADWP's growth projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat the LADWP's projected water supply, as well as the LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the projected water demand. Chapter XII of the LAMC comprises the City of Los Angeles Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the state level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use. Therefore, the Proposed Project's water demand is expected to comprise a small percentage of LADWP's existing water supplies. No further analysis of this issue is necessary.

Wastewater Treatment Facilities and Existing Infrastructure

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. The existing residential uses have sewer connections to the City's sewer system. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant ("HTP"). Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 362 mgd, and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.⁴⁴ As shown in Table IV.A-2 (Estimated Average Daily Wastewater Generation for the Proposed Project) below, the Proposed Project would generate 33,195 gpd of wastewater. The addition of only 33,195 gpd of wastewater to the HTP is less than one one-hundredth of one percent (<0.01%) of the remaining HTP capacity. Therefore, the HTP would have adequate capacity to serve the Proposed Project. As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant. No further analysis of this issue is necessary.

⁴⁴ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

**Table IV.A-2
Estimated Average Daily Wastewater Generation for the Proposed Project**

Land Use	Size	Generation Rate ^a	Total Generation
Commercial Office	249,500 sf	120 gpd/1,000 sf	29,940 gpd
Parking	162,768	20 gpd/1,000 sf	3,255 gpd
Total Wastewater Generation			33,195 gpd
Notes: gpd = gallons per day sf = square feet			
^a L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12.			

With respect to wastewater infrastructure, wastewater service is provided to the Project Site by existing sewer lines maintained by the Bureau of Sanitation. Sewer infrastructure in the vicinity of the project site includes existing 8-inch lines in both Curson Avenue and Masselin Avenue for which no gauging information is available; however they each have a 50% design capacity of 229,323 gpd.⁴⁵ An 18-inch line runs through Wilshire Boulevard with a 50% Design Capacity of 4.18 million gallons per day; this line is currently gauging at 20 percent of capacity.⁴⁶ Based on the estimated wastewater generation of 33,195 gpd for the Proposed Project it is reasonable to assume that the existing sewer lines have sufficient capacity and would thus be able to accommodate the additional flow. The City will require detailed gauging and evaluation of the Proposed Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Applicant would be required, at its own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action and would not result in any adverse environmental impacts. As such, no new or expanded wastewater infrastructure would be required to serve the Proposed Project and impacts would be less than significant. No further analysis of this issue is necessary.

The Proposed Project would not 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. For the purpose of this analysis, a significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities.

As described in above in the Hydrology analysis, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and no impact would occur. No further analysis of this issue is necessary.

The Proposed Project could have a potentially significant impact on water supplies available to serve the project from existing entitlements and resources, unless mitigation is incorporated. For the purpose of this analysis, a significant impact may occur if a project would increase water consumption to such a

⁴⁵ Written correspondence from Ali Poosti, Division Manager of Wastewater Engineering Services division, Los Angeles Department of Water and Power, March 28, 2013.

⁴⁶ Poosti, Op cit.

degree that new water sources would need to be identified. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Department of Water and Power's most current water management plan indicates that a sufficient water supply is expected to be available to serve the Proposed Project. Sufficient water supplies would be available to serve the Proposed Project from existing entitlements and resources, therefore, new or expanded entitlements will not be necessary. The Project will be required to incorporate the Department of Water and Power's water-saving Regulatory Compliance Measures to ensure that the Project will have a less than significant impact on the City's water supply. No further analysis of this issue is necessary.

Regulatory Compliance Measures:

RC-UTIL-1 The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Proposed Project, and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

RC-UTIL-2 The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RC-UTIL-3 In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- Weather-based irrigation controller with rain shutoff
- Matched precipitation (flow) rates for sprinkler heads
- Drip/microspray/subsurface irrigation where appropriate
- Minimum irrigation system distribution uniformity of 75 percent

- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- Use of landscape contouring to minimize precipitation runoff

RC-UTIL-4 If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.

RC-UTIL-5 Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

RC-UTIL-6 Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

RC-UTIL-7 A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.

RC-UTIL-8 Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

RC-UTIL-9 Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.

RC-UTIL-10 Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

The Proposed Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide 2006, a project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

As stated above, the sewage flow from operation of the Proposed Project would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Proposed Project.⁴⁷ Therefore, impacts would be less than significant. No further analysis of this issue is necessary.

⁴⁷ Poosti, *Op cit.*

The Proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs. For the purpose of this analysis, a significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether the project results in a significant impact on solid waste shall be made considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Assembly Bill 341 ("AB341") requires mandatory commercial recycling in California beginning July 1, 2012. Businesses that generate four cubic yards or more of commercial solid waste per week must recycle. It is assumed that the Applicant would contract with a local commercial solid waste hauler following completion of the Proposed Project. As required by AB341, commercial solid waste haulers in the greater Los Angeles Area separate and recycle all reusable material collected from the project site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. However, over 90 percent of the construction and residential solid waste generated in the City of Los Angeles is disposed of at the Sunshine Canyon Landfill. The capacity and estimated closure date for the landfill is included in Table IV.A-3 (Landfill Capacity and Intake).

Table IV.A-3
Landfill Capacity and Intake

Landfill Facility	Estimated Closure Date	Permitted Daily Intake (tons/day)	Average Daily Intake (tons/day)	Remaining Permitted Daily Intake (tons/day)
Sunshine Canyon ^a	2037	12,100	9,200	2,900
Chiquita Canyon ^b	2019	6,000	4,995	1,005
Total Remaining Intake				3,905
<i>Notes:</i>				
^a Sunshine Canyon Landfill website, http://www.sunshinecanyonlandfill.com/home/Future.html .				
^b California Department of Resources Recycling and Recovery website, www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0052 .				

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Proposed Project is estimated to generate a total of approximately 2,338 tons of solid waste over the approximately 24-

month construction period⁴⁸; approximately 46.25 cubic yards of demolition debris per day over the one-month demolition period (20 working days) and approximately 1.82 tons of construction waste per day over the 24-month construction period. The remaining combined daily intake of the Sunshine Canyon Landfill and Chiquita Canyon Landfill is 3,905 tons per day. As such, they would have adequate capacity to accommodate the construction waste generated by the Proposed Project over its entire construction period. Therefore, a less than significant impact associated with construction waste would occur. No further analysis of this issue is necessary.

Additionally, the City of Los Angeles imposes certain Regulatory Compliance Measures, included below as UTIL-11 and UTIL-12, which will also ensure that solid waste impacts remain less-than-significant.

As shown in Table IV.A-4 (Estimated Average Daily Solid Waste Generation for the Proposed Project), the operation of the Proposed Project would generate approximately 1,687 pounds per day.

This increase in solid waste per day is modest and would be handled by a local existing waste collection service. Additionally, the amount is minimal compared to daily capacities of nearby recycling or disposal facilities and transfer stations and these modest amounts would be further reduced through source reduction and recycling programs (as required by AB939 and AB341) and the implementation of Compliance Measure UTIL-13. Furthermore, the Proposed Project would not conflict with solid waste policies or objectives that are required by law, statute, or regulation. Therefore, the Proposed Project would result in a less than significant impact with respect to operational waste. No further analysis of this issue is necessary.

Table IV.A-4
Estimated Average Daily Solid Waste Generation for the Proposed Project

Land Use	Size	Generation Rate ^a	Total Generation (lbs/day)
Commercial - Office	249,500 sf	6 lbs / 1,000 sf	1,497
Parking	162,768 sf	1 lb / 1,000 sf	163
Total Solid Waste Generation			1,660
Notes: lbs = pounds sf = square feet			
^a Cal Recycle, website: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm .			

Regulatory Compliance Measures:

Construction

RC-UTIL-11 Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the LADBS. The

⁴⁸ Approximately 25,000 square feet of asphalt to be removed (one foot layer of asphalt over the project site) = 925 cubic yards of existing surface parking lot to be removed, and 4.02 lb./sq.ft. of commercial construction (USEPA Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, page A-1) x 416,730 sq.ft. new building = 838 tons.

demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction related wastes.

RC-UTIL-12 To facilitate on-site separation and recycling of demolition and construction related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program.

Operation

RC-UTIL-13 In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.

The Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

The Proposed Project would generate solid waste that is typical of commercial office and parking operations and be consistent with all federal, state, and local statutes and regulations regarding proper disposal. Therefore, impacts would be less than significant. No further analysis of this issue is necessary.

IV. ENVIRONMENTAL IMPACT ANALYSIS

B. AESTHETICS - SHADE/SHADOW

1. INTRODUCTION

Potential effects of the Proposed Project related to visual character, views and light/glare are addressed in Section IV.A, Impacts Found to be Less Than Significant, of this EIR. This section addresses the potential effects of the shadows that would be cast by the Proposed Project. The issue of shade and shadow pertains to the blockage of direct sunlight for a given amount of time that affects certain land uses. Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational, schools, and outdoor restaurants have expectations for direct sunlight and warmth from the sun. These land uses are termed “shadow-sensitive,” because sunlight is important to function, physical comfort, and commerce. This section also includes an assessment of whether project-specific shadows would cast onto shade-sensitive receptors in excess of the City of Los Angeles’ threshold for shadow impacts. Shadow lengths are dependent on the height and size of the building from which the shadow is cast and the angle of the sun. The angle of the sun varies based on the rotation of the earth (i.e., time of day) and elliptical orbit (i.e., change in seasons). The longest shadows are cast during the winter months, and the shortest shadows are cast during the summer months.

2. ENVIRONMENTAL SETTING

A. Shading

Winter and Summer Solstice

“Solstice” is defined as either of the two points on the sun’s elliptic that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun’s apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 ½° of the arc. At the time of summer solstice, around June 21, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. At winter solstice, around December 21, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. Measuring shadow lengths for the winter and summer solstices represents the extreme shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year. Shadows are shown for summer solstice, cast from 9:00 AM to 5:00 PM, and for winter solstice, cast from 9:00 AM to 3:00 PM

Spring and Fall Equinoxes

“Equinox” is defined as either of two points of intersection of the sun’s apparent annual path and the plane of the earth’s equator, that is, a point of intersection of the elliptic and the celestial equator. At the equinoxes, day and night are the same duration as the sun’s transit falls on the equator. Shadows cast on the equinoxes are intermediary between the solstices.

B. Regulatory Setting

There are no existing regulations and City ordinances related to shade and shadow that would apply to the Proposed Project.

C. Shadow-Sensitive Land Uses

According to the *L.A. CEQA Thresholds Guide 2006*, facilities and operations that are sensitive to the effects of shading generally include, but are not limited to: routinely useable outdoor spaces associated with residential or institutional land uses; commercial uses, such as pedestrian-oriented outdoor areas or restaurants with outdoor eating areas; nurseries; existing solar collectors; and recreational areas, such as parks. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Sensitive receptors in the vicinity of the Project Site include the following:

- parkland (Hancock Park) to the west of the Project Site; and
- residential land uses to the north and east.

Sensitive (outdoor café) uses to the south are not included in the following analysis as the pattern of shadows rotates in a sweeping arc around the Project area, starting in the west and ending in the east.

D. Existing Shadow Patterns

The mid-rise buildings in the immediate vicinity of the Project Site creates a varying pattern of shadows that rotates in a sweeping arc within and beyond the boundaries of the Project Site toward the west, north, and east, according to the movement of the sun. The Project Site's shadows primarily do not extend beyond the immediate vicinity of the Project Site, except for during the early morning and late afternoon hours throughout the year. In general, shadows produced by structures in the immediate vicinity of the Project Site do not extend far from the Project Site and do not reach nearby properties, except for during early morning or late evening hours.

The existing parking structure on the Project Site currently casts a shadow which shades the residential uses to the north of the Project Site (refer to Figures IV.B-1 and IV.B-2).

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

The *L.A. CEQA Thresholds Guide 2006* (page A.3-2) states that a project would have a significant impact if it would:

- Cast shadow on shade-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October).

B. Methodology

The consequences of shadows on land uses can be positive, including cooling effects during warm weather, or negative, such as loss of warmth during cooler weather and loss of natural light. Shadow effects are dependent on several factors, including local topography, the height and bulk of a project's

structural elements, sensitivity of surrounding uses, season, and duration of shadow projection. In determining the effects of shading, the locations of sensitive uses (such as residential, recreational, schools, and outdoor restaurants) in the surrounding area are identified and the shading effects are calculated according to standard criteria. Impacts are calculated according to the proposed building heights and the distance from the sun obstructing structures to the sensitive use.

Shadows have been calculated and plotted for representative hours during the spring and fall equinoxes and winter and summer solstices. Residential, recreational, school, and outdoor restaurant uses with routinely used outdoor areas and where sunlight may be important to physical comfort or function, are considered sensitive uses. The *L.A. CEQA Thresholds Guide 2006* significance criteria apply to the hours occurring between 9:00 AM and 3:00 PM during the winter and spring and between the hours of 9:00 AM and 5:00 PM during the summer and fall. The varying and seasonally adjusted daytime hours represent the period of the day in which the expectation of available sunlight exists. For the purpose of establishing the hours in which significant impacts occur, winter and spring are described as occurring between late October to early April, and summer and fall are described as occurring between early April and late October.

Graphical representations of the shadows that would be cast by the Proposed Project's structures have been prepared and provide the basis for the shadow impact analysis in this EIR. These graphics conservatively reflect no building separations or transitional heights, which could be incorporated into the final design of the Proposed Project, and assume a maximum office building height of 207 feet and a maximum parking structure height of 72 feet.

C. Project Impacts

The Proposed Project involves the demolition of an existing surface parking lot, construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to an existing five-level parking structure. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high.

Shadow figures are provided for existing conditions and for the Proposed Project as follows:

- Figure IV.B-1 (Existing Summer Solstice Shadows) depicts the maximum extent of the Proposed Project's summer shadows between the hours of 9:00 AM and 5:00 PM;
- Figure IV.B-2 (Existing Winter Solstice Shadows) depicts the maximum extent of the Proposed Project's winter shadows between the hours of 9:00 AM and 3:00 PM;
- Figure IV.B-3 (Project Summer Solstice Shadows) depicts the maximum extent of the Proposed Project's summer shadows between the hours of 9:00 AM and 5:00 PM;
- Figure IV.B-4 (Project Winter Solstice Shadows) depicts the maximum extent of the Proposed Project's winter shadows between the hours of 9:00 AM and 3:00 PM;

Summer Shadows

As shown in Figure IV.B-3, the Proposed Project would cast shadows primarily to the northwest through the northeast during the Summer Solstice. These shadows would fall on the residential uses to the north of the Project Site.

At 9:00 AM summer shadows from the Proposed Project office tower would be cast in a northwesterly direction. The shadows would shade a western portion of the Museum Terrace Apartment building and portions of its central courtyard. Summer shadows from the Proposed Project parking structure would be cast in a northwesterly direction. The shadows would shade a southern portion of the Museum Terrace Apartment building and a southern portion of the Masselin Park West Apartment building.

At 12:00 PM summer shadows from the Proposed Project office tower would be cast in a northern direction. These shadows would shade a portion of the northern entry drive of the Project Site. No sensitive uses are located in this area. Summer shadows from the Proposed Project parking structure would be cast in a northern direction. The shadows would shade a small southern portion of the Museum Terrace Apartment building and a small southern portion the Masselin Park West Apartment building.

At 5:00 PM summer shadows from the Proposed Project office tower would be cast in a northeasterly direction. The shadows would shade a western portion of the Museum Terrace Apartment building and portions of its central courtyard. Summer shadows from the Proposed Project parking structure would be cast in a northeastern direction. The shadows would shade a southern portion of the Museum Terrace Apartment building and a southern portion the Masselin Park West Apartment building.

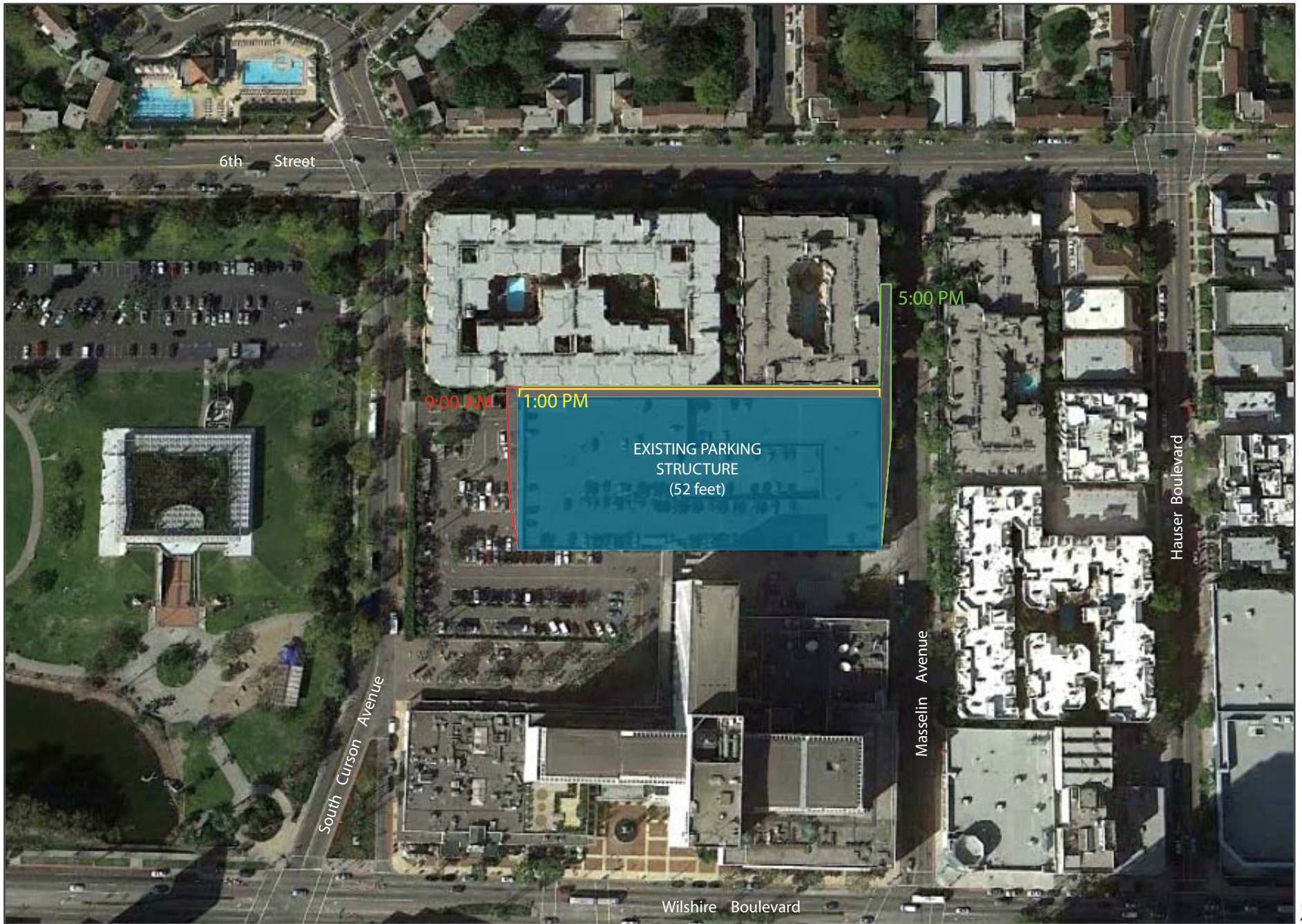
Winter Shadows

As shown in Figure IV.B-4, the Proposed Project would cast far-reaching shadows to the northwest and northeast during the Winter Solstice. These shadows would fall on park and residential uses north and east of the Project Site.

At 9:00 A.M. winter shadows from the Proposed Project office tower would be cast in a northwesterly direction. The shadows would shade a portion of Hancock Park, a small western portion of the Museum Terrace Apartment building, and a portion of the Park La Brea Apartments. Winter shadows from the Proposed Project parking structure would be cast in a northwesterly direction. The shadows would shade a southern portion of the Museum Terrace Apartment building and a southern portion of the Masselin Park West Apartment building.

At 12:00 P.M. winter shadows from the Proposed Project office tower would be cast in a northern direction. The shadows would shade a western portion of the Museum Terrace Apartment building and portions of its central courtyard. Winter shadows from the Proposed Project parking structure would be cast in a northern direction. The shadows would shade a southern portion of the Museum Terrace Apartment building and a southern portion of the Masselin Park West Apartment building.

At 3:00 P.M. winter shadows from the Proposed Project office tower would be cast in a northeasterly direction. The shadows would shade a large eastern portion of the Museum Terrace Apartment building and portions of its central courtyard; the shadow would also extend into and shade a western portion of the Masselin Park West Apartment building and a portion of its central courtyard. Winter shadows from the Proposed Project parking structure would be cast in a northeastern direction. The shadows would shade a southern portion of the Museum Terrace Apartment building and a southern portion of the Masselin Park West Apartment building.



Source: Google Earth and EcoTierra Consulting, April 2013.

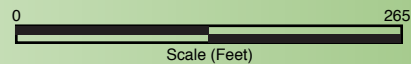
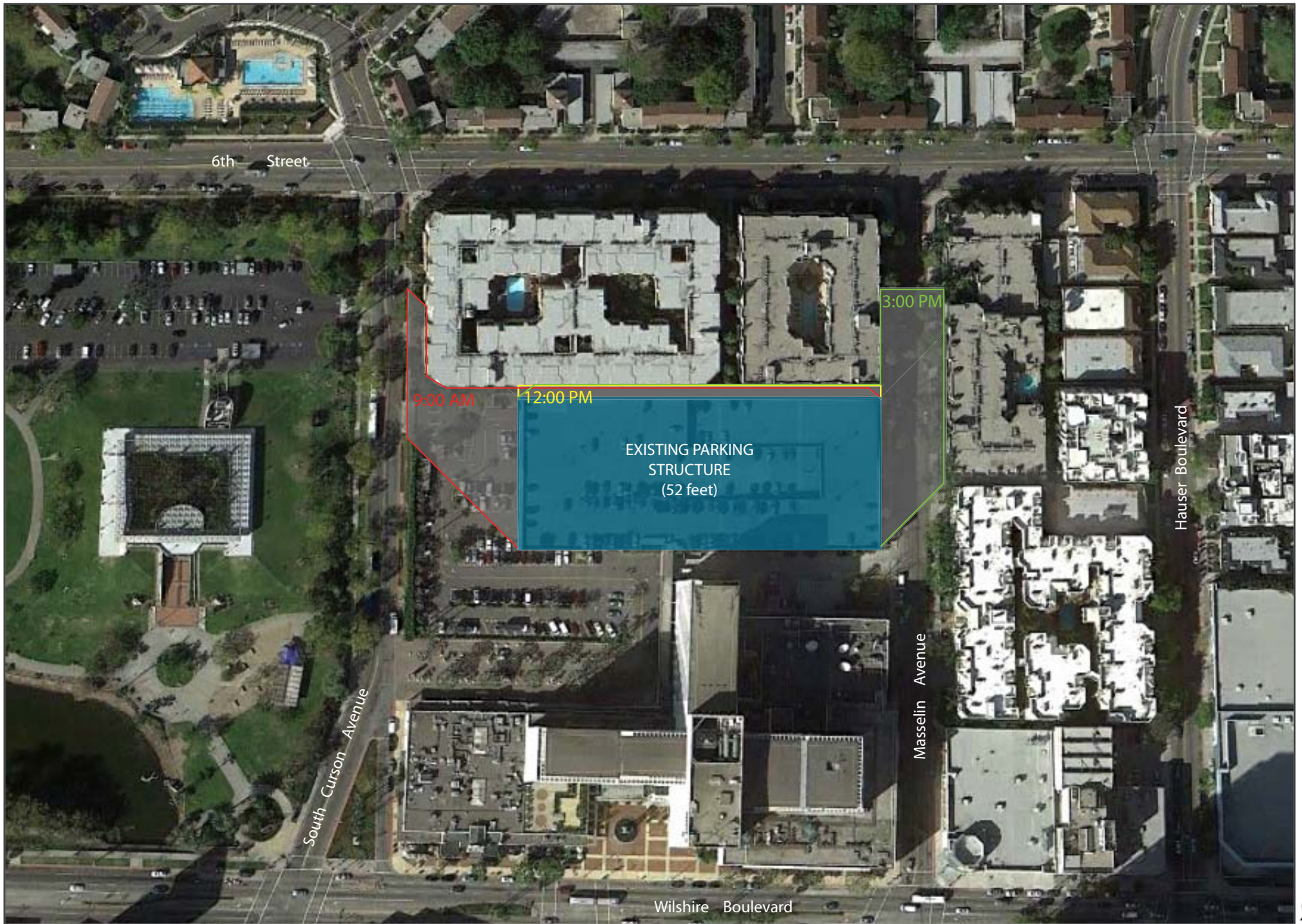
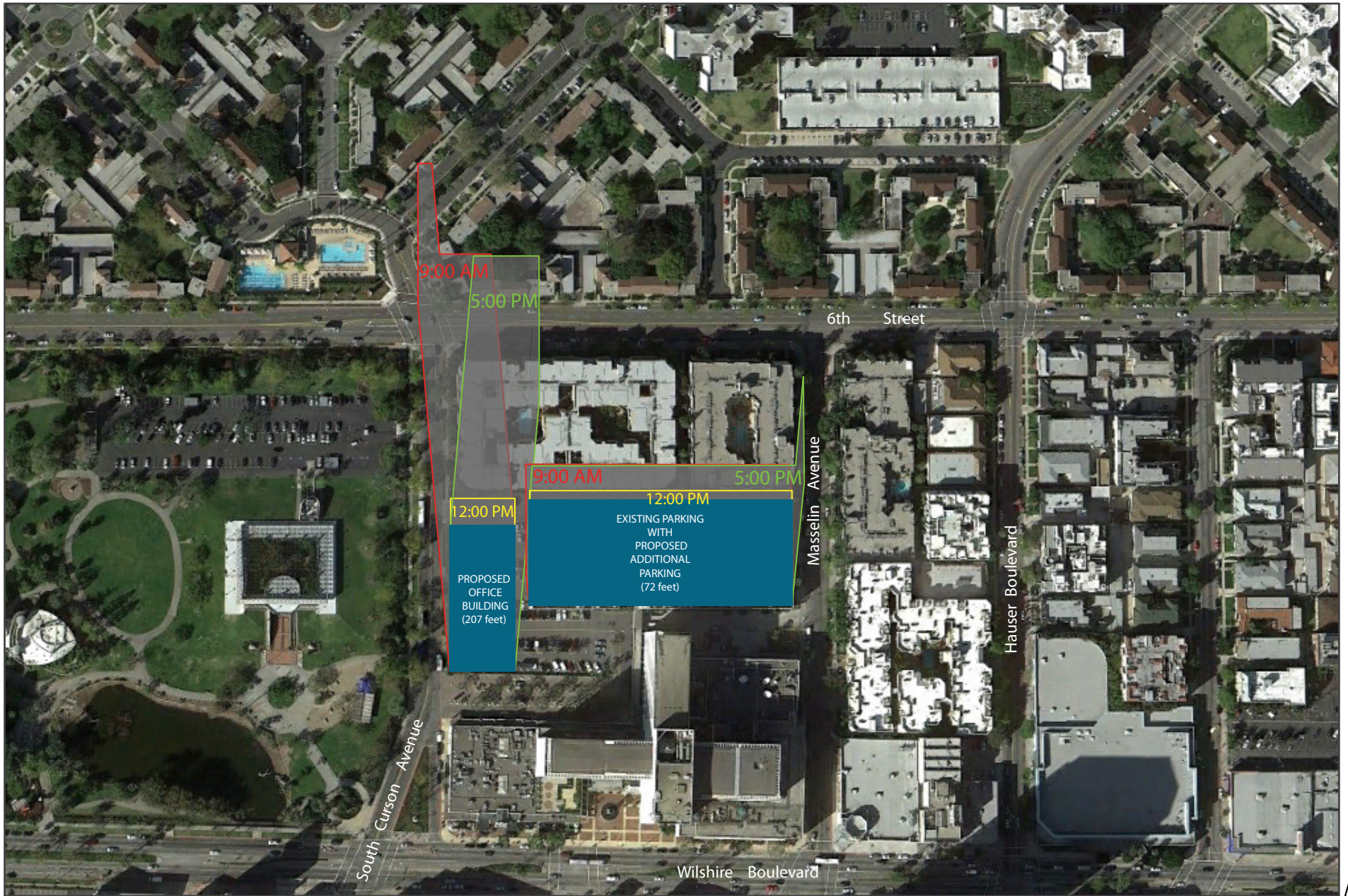


Figure IV.B-1
Existing Summer Solstice Shadows
June 21st



Source: Google Earth and EcoTierra Consulting, April 2013.



Source: Google Earth and EcoTierra Consulting, April 2013.

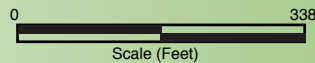


Figure IV.B-3
Proposed Summer Solstice Shadows
June 21st



Source: Google Earth and EcoTierra Consulting, April 2013.

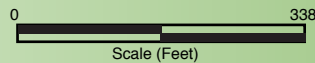


Figure IV.B-4
Proposed Winter Solstice Shadows
December 21st

Summer shadows from the Proposed Project office tower would shade the west and south-facing balconies and a portion of the central courtyard of Museum Terrace Apartment building between the hours of 9:00 AM and noon, and would shade the south-facing balconies and a larger portion of the central courtyard between 2:00 PM and 5:00 PM. Summer shadows from the parking structure would shade a southern portion of the Museum Terrace Apartment building, including south-facing balconies, and a southern portion of the Masselin Park West Apartment building, between the hours of 9:00 AM and noon and between 2:00 PM and 5:00 PM.

Winter shadows from the Proposed Project office tower would shade a portion of Hancock Park, some west and all south-facing balconies of the Museum Terrace Apartment building between the hours of 9:00 AM and noon; between noon and 3:00 PM shadows from the office tower would shade the central courtyard areas and all south-facing balconies. Winter shadows from the parking structure would shade a southern portion of the Museum Terrace Apartment building, including south-facing balconies, and a southern portion of the Masselin Park West Apartment building, including a portion of the central courtyard, between the hours of 9:00 AM and 3:00 PM.

As shown, portions of parkland and routinely useable outdoor spaces associated with multi-family residential buildings would be shaded by the Proposed Project for more than three hours between the hours of 9:00 AM and 5:00 PM during the summer/fall and between the hours of 9:00 AM and 3:00 PM during the winter/spring. Consequently, shadow impacts from the Proposed Project would be significant.

Cumulative Impacts

The Project Site and surrounding area are situated in a high-density, mixed-use area of Los Angeles. Development of the Proposed Project, in conjunction with the Related Projects listed in Section III (Environmental Setting), would result in an increase of shading impacts in the Project vicinity. A cumulative shading impact may occur if a related project were constructed adjacent to or near the Proposed Project and resulted in a shadow overlap such that the new combined shadow would be cast upon shadow-sensitive uses in excess of the threshold. There are no related projects located in close enough proximity to the Project Site to potentially result in a cumulative shade-shadow impact. Similar to the Proposed Project, each of the Related Projects would be evaluated to determine the degree to which these developments would create shading impacts. Therefore, the Proposed Project would not result in a cumulatively significant shading impact.

4. MITIGATION MEASURES

While significant impacts related to shade and shadows have been identified, there are no feasible mitigation measures. Reducing height and reconfiguration of Project buildings to potentially reduce shadow impacts is addressed in Section VI, Alternatives, of this EIR.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Proposed Project would shade off-site residential sensitive uses in excess of the established significance thresholds and, therefore, would cause a significant and unavoidable shade/shadow impact.

IV. ENVIRONMENTAL IMPACT ANALYSIS

C. AIR QUALITY

1. INTRODUCTION

This section examines the degree to which the Proposed Project may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities such as site grading and haul truck trips, as well as long-term effects related to the ongoing operation of the Proposed Project are discussed in this section. The analysis contained herein focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the actual quantity of pollutant measured in pounds per day (ppd). “Concentrations” refer to the amount of pollutant material per volumetric unit of air and are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

The potential for the Proposed Project to conflict with or obstruct implementation of the applicable air quality plan, to violate an air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, to expose sensitive receptors to substantial pollutant concentrations, or to create objectionable odors affecting a substantial number of people are also discussed.

This section is based on the information provided in the [Air Quality Impact Analysis for the Museum Square Office Building](#), by Cadence Environmental Consultants, dated October 2013 (AQ Report). The AQ Report, including all calculation data is incorporated herein by this reference, and provided in Appendix IV.C to this Draft EIR. Documents used in the preparation of this analysis include the South Coast Air Quality Management District (SCAQMD) *CEQA Air Quality Handbook* and the 2012 Air Quality Management Plan (AQMP), adopted December 7, 2012, as well as federal and State regulations and guidelines.

2. ENVIRONMENTAL SETTING

The Project Site is located within the South Coast Air Basin (Basin), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys below. This Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources – such as dense population centers, heavy vehicular traffic, and industry – and meteorology.

Air Pollutants

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generates heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential

and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbecue lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and State governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health and welfare. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, that have been adopted for them. The national and State standards have been set at levels considered safe to protect public health, including the health of “sensitive” populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

The criteria air pollutants that are most relevant to current air quality planning and regulation in the Basin include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). In addition, toxic air contaminants (TACs) are of a concern in the Basin. The characteristics of each of these pollutants are briefly described below.

- O_3 is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs), sometimes referred to as volatile organic compounds (VOC), and nitrogen oxides (NO_x), byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3 , motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- NO_2 is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_x compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitors.
- PM_{10} and $PM_{2.5}$ consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

- SO_2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_x).
- *Pb* occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne *Pb* in the Basin. The use of leaded gasoline is no longer permitted for on road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles such as racecars. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, *Pb* is present in many urban soils and can be re-suspended in the air. Other sources of *Pb* include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters.
- *TACs* refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. *TACs* include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. *TACs* are different than “criteria” pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be felt on a local scale rather than on a regional basis.

Health Effects of Criteria Pollutants

The health effects of the criteria pollutants (i.e., O_3 , CO, PM_{10} and $PM_{2.5}$, NO_2 , SO_2 , and *Pb*) and *TACs* are described below.¹ In addition, a list of the harmful effects of each criteria pollutant is provided in Table IV.C-1, Summary of Health Effects of Criteria Pollutants.

¹ *The descriptions of the health effects of the criteria pollutants are taken from Appendix C (Health Effects of Ambient Air Pollutants) of SCAQMD’s “Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning” document.*

**Table IV.C-1
Summary of Health Effects of Criteria Pollutants**

Pollutants	Primary Health and Welfare Effects
Ozone (O₃)	<ul style="list-style-type: none"> • Aggravation of respiratory and cardiovascular diseases • Reduced lung function • Increased cough and chest discomfort
Carbon Monoxide (CO)	<ul style="list-style-type: none"> • Aggravation of some heart disease (angina) • Reduced tolerance for exercise • Impairment of mental function • Impairment of fetal development • Death at high levels of exposure
Nitrogen Dioxide (NO₂)	<ul style="list-style-type: none"> • Aggravation of respiratory illness
Respirable and Fine Particulate Matter (PM₁₀ and PM_{2.5})	<ul style="list-style-type: none"> • Reduced lung function • Aggravation of respiratory and cardio-respiratory diseases • Increases in mortality rate • Reduced lung function growth in children
Sulfur Dioxide (SO₂)	<ul style="list-style-type: none"> • Aggravation of respiratory diseases (asthma, emphysema) • Reduced lung function
Lead (Pb)	<ul style="list-style-type: none"> • Behavioral and hearing disabilities in children • Nervous system impairment
<i>Source: SCAQMD, Guidance Document for Air Quality Issues in General Plans and Local Planning, Appendix C, 2005.</i>	

Ozone

Individuals exercising outdoors, children and people with preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for ozone effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated ozone levels are associated with increased school absences. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities.

Ozone exposure under exercising conditions is known to increase the severity of the above mentioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Carbon Monoxide

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities. Additional research is needed to confirm these results.

Nitrogen Dioxide

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy individuals. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of NO₂ considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of O₃ and NO₂.

Particulate Matter

A consistent correlation between elevated ambient respirable and fine particulate matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease and children appear to be more susceptible to the effects of PM₁₀ and PM_{2.5}.

Sulfur Dioxide

A few minutes exposure to low levels of SO₂ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂.

Animal studies suggest that despite SO₂ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Lead

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence levels. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early-age environmental exposure, and elevated blood lead levels can occur due to the breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Sulfates

Most of the health effects associated with fine particles and SO₂ at ambient levels are also associated with SO₄. Thus, both mortality and morbidity effects have been observed with an increase in ambient SO₄ concentrations. However, efforts to separate the effects of SO₄ from the effects of other pollutants have generally not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric acid aerosol and ammonium bisulfate are more toxic than non-acidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

Toxic Air Contaminants

TACs are a broad class of compounds known to cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. As discussed previously, effects from TACs may be both chronic and acute on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects result from low-dose, long-term exposure from routine releases of air toxics. The effect of major concern for this type of exposure is cancer, which requires a period of 10-30 years after exposure to develop.

TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to the California Air Resources Board (ARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the ARB, and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants programs. The United States Environmental Protection Agency (U.S. EPA) has adopted Ultra Low Sulfur Diesel (ULSD) fuel standards that went into effect in June 2006 in an effort to reduce diesel particulate matter substantially. As of June 1, 2006, refiners and importers nationwide have been required by the U.S. EPA to ensure that at least 80 percent of the volume of the highway diesel fuel they produce or import would be ULSD-compliant. By December 10, 2010, only ULSD fuel will be available for highway use nationwide. In California, which was an early adopter of ULSD fuel and engine technologies, 100 percent of the diesel fuel sold – downstream from refineries, up to and including fuel terminals that store diesel fuel – was ULSD fuel since July 15, 2006. Since September 1, 2006, all diesel fuel offered for sale at retail outlets in California have been ULSD fuel.

Existing Conditions

Existing Regional Air Quality

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. The most current average daily emissions inventory for the entire Basin and the Los Angeles County portion of the Basin is summarized in Table IV.C-2, 2008 Estimated Average Daily Regional Emissions.² As shown, exhaust emissions from mobile sources generate the majority of ROG, CO, NO_x, and SO_x in the Basin and the Los Angeles County portion of the Basin. Area-wide sources generate the most airborne particulates (i.e., PM₁₀ and PM_{2.5}) in both the Basin and Los Angeles County.

² *The estimated annual average emissions for 2008 are the most recent data provided by the ARB.*

**Table IV.C-2
2008 Estimated Average Daily Regional Emissions**

Emissions Source	Emissions in Tons per Day					
	ROG	CO	NO _x	SO _x	PM ₁₀	PM _{2.5}
South Coast Air Basin						
Stationary (Point) Sources	107.0	48.1	56.0	16.1	24.0	15.4
Area-wide Sources	142.6	111.3	25.8	0.9	214.9	52.1
Mobile Sources	361.6	3,090.0	738.2	21.0	43.4	34.4
Natural (non-anthropogenic) Sources	86.5	164.2	5.0	1.5	16.6	14.1
Total Emissions	697.7	3,413.6	825.0	39.5	298.9	116.0
Los Angeles County – SCAQMD Jurisdiction						
Stationary (Point) Sources	61.0	34.7	36.6	14.4	13.4	9.7
Area-wide Sources	81.5	44.0	15.3	0.4	103.8	26.2
Mobile Sources	209.2	1,801.3	446.6	19.5	25.7	20.5
Natural (non-anthropogenic) Sources	34.3	65.0	1.9	0.6	6.6	5.6
Total Emissions	386.0	1,945.0	500.4	34.9	149.5	62.0
Sources: California Air Resources Board, 2008 Almanac Emission Projection Data, website: http://www.arb.ca.gov/ei/emissiondata.htm , May 2013.						

Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and the ARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment.” If the pollutant exceeds the standard, the area is classified as a “non-attainment” area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.”

The U.S. EPA and the ARB use different standards for determining whether the Basin is in attainment. Federal and State standards are summarized in Table IV.C-3, Ambient Air Quality Standards. The attainment status for the Los Angeles County portion of the Basin with regard to the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS) are shown in Table IV.C-4, Attainment Status for the South Coast Air Basin (Los Angeles County Portion).

**Table IV.C-3
Ambient Air Quality Standards**

Air Pollutant	Averaging Time	State Standard	Federal Standard
Ozone (O ₃)	1 Hour	0.09 ppm	--
	8 Hour	0.07 ppm	0.075 ppm
Carbon Monoxide (CO)	1 Hour	20.0 ppm	35.0 ppm
	8 Hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide (NO ₂)	1 Hour	180 ppb	100 ppb
Sulfur Dioxide (SO ₂)	1 Hour	250 ppb	75 ppb
	24 Hour	40 ppb	140 ppb
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	150 µg/m ³
Fine Particulate Matter (PM _{2.5})	24 Hour	--	35 µg/m ³
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³ (primary) 15 µg/m ³ (secondary)
Lead	30 Day Average	1.5 µg/m ³	--
	Calendar Quarter	--	1.5 µg/m ³ (for certain areas)
	Rolling 3-Month Average	--	0.15 µg/m ³

ppm = parts per million ppb = parts per billion µg/m³ = microgram per cubic meter
Source: California Air Resources Board, Ambient Air Quality Standards, website:
<http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, May 2013.

**Table IV.C-4
Attainment Status for the South Coast Air Basin (Los Angeles County Portion)**

Pollutant	Attainment Status	
	NAAQS	CAAQS
Ozone	Non-Attainment	Non-Attainment
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Non-Attainment
Sulfur Dioxide	Attainment	Attainment
PM ₁₀	Non-Attainment	Non-Attainment
PM _{2.5}	Non-Attainment	Non-Attainment
Lead	Non-Attainment	Non-Attainment

*Source: California Air Resources Board: State Area Designation Maps, website:
<http://www.arb.ca.gov/desig/adm/adm.htm>, May 2013.*

Existing Local Air Quality

The SCAQMD divides the Basin into 38 source receptor areas (SRAs) in which 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The Project Site is located in the Wilshire Community of the City of Los Angeles and is located within SRA 1, which covers the Central Los Angeles area.³ Currently, SCAQMD Station No. 087 collects ambient air quality data for SRA 1. This station currently monitors emission levels of O₃, CO, NO₂, SO₂, PM₁₀, and PM_{2.5}. Table IV.C-5, Summary of Ambient Air Quality in the Proposed Project Vicinity, identifies the national and State ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured between 2009 and 2011.⁴

According to the air quality data from the SCAQMD Station No. 087 shown in Table IV.C-5, the national 1-hour ozone standard was exceeded for a total of one day from 2009 to 2011, while the State 1-hour ozone standard was exceeded for a total of four days from 2009 to 2011. The national 8-hour ozone standard was exceeded a total of three days from 2009 to 2011, while the State 8-hour ozone standard has been exceeded for a total of six days during that time period. The national 24-hour PM₁₀ standard was not exceeded from 2009 to 2011, while the State 24-hour PM₁₀ standard was exceeded a total of five days during that time period. For PM_{2.5}, the national 24-hour standard was exceeded for a total of 13 days from 2009 to 2011. Furthermore, no national or State standards for CO, NO₂, or SO₂ have been exceeded from 2009 to 2011.

Table IV.C-5
Summary of Ambient Air Quality in the Proposed Project Vicinity

Air Pollutants Monitored Within SRA 1— Central Los Angeles Area	Year		
	2009	2010	2011
Ozone (O₃)			
Maximum 1-hour concentration measured	0.139 ppm	0.098 ppm	0.087 ppm
Number of days exceeding national 0.12 ppm 1-hour standard	1	0	0
Number of days exceeding State 0.09 ppm 1-hour standard	3	1	0
Maximum 8-hour concentration measured	0.100 ppm	0.080 ppm	0.065 ppm
Number of days exceeding national 0.075 ppm 8-hour standard	2	1	0
Number of days exceeding State 0.07 ppm 8-hour standard	5	1	0
Respirable Particulate Matter (PM₁₀)			
Maximum 24-hour concentration measured	72.0 µg/m ³	42.0 µg/m ³	53.0 µg/m ³
Number of days exceeding national 150 µg/m ³ 24-hour standard	0	0	0
Number of days exceeding State 50 µg/m ³ 24-hour standard	4	0	1
Annual Arithmetic Mean (AAM)	33.1 µg/m ³	27.1 µg/m ³	29.0 µg/m ³

³ SCAQMD, website: <http://www.aqmd.gov/map/MapAQMD2.pdf>, May 2013.

⁴ The most current air quality data available pertaining to ambient pollutant concentrations over a three-year period provided by the SCAQMD is from 2009 to 2011.

**Table IV.C-5
Summary of Ambient Air Quality in the Proposed Project Vicinity**

Air Pollutants Monitored Within SRA 1— Central Los Angeles Area	Year		
	2009	2010	2011
Does measured AAM exceed national 150 µg/m ³ AAM standard?	No	No	No
Does measured AAM exceed State 20 µg/m ³ AAM standard?	Yes	Yes	Yes
Fine Particulate Matter (PM_{2.5})			
Maximum 24-hour concentration measured	61.7 µg/m ³	39.2 µg/m ³	49.3µg/m ³
Number of days exceeding national 35.0 µg/m ³ 24-hour standard	7	2	4
Annual Arithmetic Mean (AAM)	14.3 µg/m ³	11.9 µg/m ³	13.0 µg/m ³
Does measured AAM exceed national 15 µg/m ³ AAM standard?	No	No	No
Does measured AAM exceed State 12 µg/m ³ AAM standard?	Yes	No	Yes
Carbon Monoxide (CO)			
Maximum 1-hour concentration measured	3.0 ppm	3.0 ppm	n/a
Days exceeding national 35.0 ppm 1-hour standard	0	0	0
Days exceeding State 20.0 ppm 1-hour standard	0	0	0
Maximum 8-hour concentration measured	2.2 ppm	2.3 ppm	2.4 ppm
Number of days exceeding national 9.0 ppm 8-hour standard	0	0	0
Number of days exceeding State 9.0 ppm 8-hour standard	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour concentration measured	120 ppb	89 ppb	109.6 ppb
Number of days exceeding State 180 ppb 1-hour standard	n/a	n/a	n/a
Annual average	28.1 ppb	25.0 ppb	23.1 ppb
Does measured annual average exceed national 100 ppb annual average standard?	No	No	No
Does measured annual average exceed State 30 ppb annual average standard?	No	No	No
Sulfur Dioxide (SO₂)			
Maximum 1-hour concentration measured	10.0 ppb	9.8 ppb	19.8 ppb
Number of days exceeding national 75 ppb 1-hour standard	0	0	0
Number of days exceeding state 40 ppb 24-hour standard	0	0	0
<p><i>Note: ppm = parts by volume per million of air ppb = parts by volume per billion of air</i> <i>µg/m³=micrograms per cubic meter</i> <i>n/a = data not available or not collected by the District</i> <i>Source: State of California, Air Resources Board, Historical Data by Year, website:</i> <i>http://www.aqmd.gov/smog/historicaldata.htm, May 2013.</i></p>			

Existing Air Pollutant Emissions in Local Vicinity

The Project Site is located along a heavily trafficked segment of Wilshire Boulevard north of the I-10 Freeway and southwest of the I-101 Freeway. The land uses within the general vicinity of the Project Site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction. Air pollutant emissions are generated in the local vicinity by stationary sources and mobile sources, primarily automobile, truck, and railway traffic. Motor vehicles are the primary source of pollutants in the local vicinity.

Existing Site Emissions

The total Museum Square site is approximately 7.5 acres (327,613 square feet) in area and is fully developed with a commercial office complex with an associated surface parking lot and parking structure. The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot. The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building. Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story commercial office building and the addition of two new levels of parking to the existing five-level parking. No structures are located on the portion of the site proposed for the new office building. Therefore, the site for the proposed new office building does not support uses that generate air pollutant emissions.

Regulatory Framework

Air quality in the United States is governed by the Federal Clean Air Act (CAA). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the CAA is administered by the U.S. EPA. In California, the CCAA is administered by the ARB at the State level and by the Air Quality Management Districts at the regional and local levels.

Air quality within the Basin is addressed through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the Basin are discussed below.

Federal**U.S. EPA**

The U.S. EPA is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify

specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

State

California Air Resources Board

The California Clean Air Act (CCAA) requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The California Air Resources Board (“ARB”), a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, the ARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Appendix A to the AQ Report includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in Appendix A of the AQ Report, the CAAQS includes more stringent standards than the national ambient air quality standards.

Although not originally intended to specifically reduce air pollutant emissions, California Code of Regulations (CCR) Title 24 Part 6: California’s Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California’s energy consumption. Since then, Title 24 has been amended with a recognition that energy efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases greenhouse gas (GHG) emissions. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2011 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (“CALGreen”) Code (California Code of Regulations, Title 24, Part 11). Key provisions of the CALGreen Code that apply to the type of new non-residential developments proposed for the Project Site are as follows:

- Division 5.1 - Planning and Design
 - Section 5.106 Site Development
 - 5.106.4 Bicycle Parking and Changing Rooms
 - 5.106.5 Clean Air Vehicle Parking
 - 5.106.8 Light Pollution Reduction
 - 5.106.10 Grading and Paving
- Division 5.2 - Energy Efficiency
 - Section 5.201.1 Energy Efficiency (15 percent reduction in energy usage when compared to the mandatory energy efficiency standards from the California Energy Code (California Code of Regulations, Title 24, Part 6))

- Division 5.3 - Water Efficiency and Conservation
 - Section 5.303 Indoor Water Use
 - 5.303.1 Meters
 - 5.303.2 Twenty Percent Savings (use of plumbing fixtures and fittings that will reduce the overall use of potable water within the building by 20 percent reduction from the maximum allowable water use per fixture and fitting as required by the California Building Code (California Code of Regulations, Title 24, Part 2))
 - 5.303.4 Wastewater Reduction
 - 5.303.6 Plumbing Fixtures and Fittings
 - Section 5.304 Outdoor Water Use
 - 5.304.1 Water Budget
 - 5.304.2 Outdoor Water Use
 - 5.304.3 Irrigation Design
- Division 5.4 - Material Conservation and Resource Efficiency
 - Section 5.407 Water Resistance and Moisture Management
 - Section 5.408 Construction Waste Reduction, Disposal and Recycling
 - 5.408.1 Construction Waste Diversion
 - 5.408.2 Construction Waste Management Plan
 - 5.408.3 Construction Waste Diversion of at Least 50 Percent
 - Section 5.410 Building Maintenance and Operation
 - 5.410.1 Recycling by Occupants
- Division 5.5 - Environmental Quality
 - Section 5.504 Pollutant Control
 - 5.504.3 Covering of Duct Openings and Protection of Mechanical Equipment During Construction
 - 5.504.4 Finish Material Pollutant Control
 - 5.404.5.3 Filters

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a council of governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. It is a regional planning agency and

serves as a forum for regional issues relating to transportation, the economy, community development, and the environment.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCP is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes through the year 2015, and beyond. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAQMD

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with SCAG, county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2012 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by SCAG in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 4, 2012. The 2012 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations which are designed to address air quality impacts and pollution control measures.

Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within its jurisdiction. Instead, the SCAQMD has used its expertise and prepared the CEQA Air Quality Handbook and newer thresholds of significance to indirectly address these issues in accordance with the projections and programs of the AQMPs. The purpose of the CEQA Air Quality Handbook and newer thresholds of significance is to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin.

Specifically, the CEQA Air Quality Handbook and newer thresholds of significance explain the procedures that the SCAQMD recommends be followed during environmental review processes required by CEQA. The CEQA Air Quality Handbook and newer thresholds of significance provide direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The SCAQMD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the region, and adverse impacts will be minimized.

Local

City of Los Angeles

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Los Angeles is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

The Air Quality Element of the City of Los Angeles General Plan was adopted on November 24, 1992 and sets forth the goals, objectives and policies which will guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of state and federal air quality standards.

The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. Mutually reinforcing strategies need to be developed which work to reduce the use of single occupant vehicles and which work to reduce vehicle trips and vehicle miles traveled.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City utilizes the *CEQA Air Quality Handbook* as the guidance document for the environmental review of plans and development proposals within its jurisdiction. The City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the county and region will meet federal and State standards. Instead, the City relies upon the expertise of the SCAQMD and utilizes the CEQA Air Quality Handbook and newer thresholds of significance as the guidance documents for the environmental review of plans and development proposals within the South Coast Air Basin portion of its jurisdiction.

The City of Los Angeles has begun to address the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City of Los Angeles is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

City of Los Angeles Green Building Program Ordinance

In December 2010, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CALGreen Code as the new Los Angeles Green Building Code (“LA Green Building Code”). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code, and is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. NOTE: for an analysis of potential project impacts regarding greenhouse gas emissions, please refer to section IV.E. Greenhouse Gas Emissions in this Draft EIR.

3. ENVIRONMENTAL IMPACTS

METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the Proposed Project. Air pollutant emissions associated with the Proposed Project would result from Project operations and from Project-related traffic volumes. Construction activities would also generate air pollutant emissions at the Project Site and on roadways resulting from construction-related traffic. The net increase in Project Site emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to thresholds of significance recommended by the SCAQMD.

THRESHOLDS OF SIGNIFICANCE

Appendix G to the State CEQA Guidelines

In accordance with Appendix G to the State CEQA Guidelines, the project would have a significant air quality impact on air quality if it would cause any of the following to occur:

- a) Conflict with or obstruct implementation of the applicable air quality plan;
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including release in emissions which exceed quantitative thresholds for ozone precursors);
- d) Expose sensitive receptors to substantial pollutant concentrations; or
- e) Create objectionable odors affecting a substantial number of people.

Consistency with the Applicable AQMP

For general development projects, the SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by the project to the population projections used in the development of the AQMP. Exceeding the AQMP population projections could jeopardize attainment of the air quality conditions projected in the AQMP and is considered to be a significant impact.

Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations

Regional Mass Daily Emissions

The SCAQMD's regional emission thresholds apply to all federally regulated air pollutants. Table IV.C-8, SCAQMD's Regional Emission Thresholds of Significance, shows the thresholds of significance published by the SCAQMD for construction and operational emissions that apply to development projects.

The SCAQMD also recommends that any construction-related and operational emissions from individual development projects that exceed the construction and operational thresholds, shown in Table IV.C-6, to be considered cumulatively considerable. These thresholds apply to individual development projects only; they do not apply to the combined emissions generated by a set of cumulative development projects.

Table IV.C-6
SCAQMD's Regional Emission Thresholds of Significance

Pollutant	Construction	Operation
	pounds/day	pounds/day
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO _x)	150	150
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
Nitrogen Oxides (NO _x)	100	55
Reactive Organic Gases (ROG)	75	55

*Source: SCAQMD CEQA Air Quality Handbook, 1993, as revised in March 2011
website: <http://aqmd.gov/ceqa/handbook/signthres.pdf>, May 2013.*

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

The SCAQMD considers residences, schools, daycare centers, playgrounds, and medical facilities to be sensitive receptor land uses. The SCAQMD currently recommends that projects with site-specific operational emissions that generate the following localized pollutant concentrations at existing human receptors should be considered significant:

- 2.5 micrograms per cubic meter (“µg/m³”) of PM₁₀ averaged over a 24-hour period
- 2.5 µg/m³ meter of PM_{2.5} averaged over a 24-hour period

Because the Basin is currently in attainment of the national and State ambient air quality standards for NO₂ and CO, the SCAQMD currently recommends that projects with site-specific operational emissions that cause the following ambient air quality standards to be exceeded or contributes substantially to an exceeded standard at existing human receptors should be considered significant:

- 0.25 parts per million NO₂ averaged over a 1-hour period (State standard)
- 20 parts per million of CO averaged over a 1-hour period (State standard)
- 9.0 parts per million of CO averaged over an 8-hour period (national and State standard)

The SCAQMD also recommends that projects that could emit carcinogenic or toxic air contaminants that exceed the maximum individual cancer risk of 10 in one million be considered significant and cumulatively considerable.

PROJECT IMPACTS

Consistency with the AQMP

The 2012 AQMP, discussed previously, was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections

utilized in the formulation of the 2012 AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

It is assumed that the Proposed Project would comply with all SCAQMD rules and regulations that are in effect at the time of development; the project applicant is not requesting any exemptions from the currently adopted or proposed rules. The Proposed Project is also consistent with the existing City of Los Angeles General Plan land use designation for the site (Regional Center Commercial). As such, the increase in office building space with implementation of the Proposed Project is within the level of anticipated development of the site based on the City's General Plan. Therefore, the Proposed Project would not conflict with the 2012 AQMP and, as such, would not jeopardize attainment of State and national ambient air quality standards in the area under the jurisdiction of the SCAQMD. This would be a less than significant impact.

Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations

The mass daily emissions generated by project construction and operational activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, construction and operation of the Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The impact of the Proposed Project would be less than significant.

Impact Analysis

Mass Daily Construction Emissions

Construction of the Proposed Project is expected to last for approximately 24 months and include all of the activities discussed previously in this report. As with all construction projects less than five acres in size, the Proposed Project would be subject to the best available control measures of Table 1 of SCAQMD Rule 403 for the control of fugitive dust throughout the construction phases of development.

The analysis of mass daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod v. 2011.1.1) recommended by the SCAQMD with the assumption that the project would comply with the fugitive dust control requirements of SCAQMD Rule 403. The mass daily construction-related emissions are shown in Table IV.C-7. These emissions assume a worst-case scenario in which the full set of construction equipment would be used each day throughout the entire construction phase. In reality, each piece of equipment would only be used for a portion of each day and there would be days when very little equipment is used.

**Table IV.C-7
Estimated Mass Daily Construction Emissions**

Year of Construction	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2014	4.05	31.81	19.31	0.03	4.80	2.19
2015	64.28	49.65	48.27	0.09	6.91	3.47
2016	63.58	46.11	46.51	0.09	6.60	3.17
SCAQMD Threshold of Significance	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Construction emission calculations based on the construction phasing discussed previously in this report. Calculated PM10 and PM2.5 emissions assume compliance with SCAQMD Rule 403. CalEEMod result sheets are provided in Appendix B of the AQ Report. Source: Cadence Environmental Consultants, May 2013.</i>						

As shown in Table IV.C-7, the mass daily construction-related emissions generated during the project construction phase would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, this impact of the project would be less than significant.

Mass Daily Operational Emissions

Operational emissions generated by area sources, energy sources, and mobile sources would result from the increased amount of normal day-to-day activities at the Project Site after occupation. The increase in daily operational emissions has been calculated utilizing CalEEMod. The results of these calculations are presented in Table IV.C-8. As shown, the Proposed Project would generate an increase of mass daily emissions that does not approach the thresholds of significance recommended by the SCAQMD. As such, the impact of the Project on air quality would be less than significant.

**Table IV.C-8
Estimated Mass Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	8.91	0.00	0.00	0.00	0.00	0.00
Energy Sources	0.07	0.64	0.54	0.00	0.05	0.05
Mobile sources	6.71	16.26	65.01	0.14	15.48	1.30
Total Emissions	15.69	16.90	65.55	0.14	15.53	1.35
SCAQMD Threshold of Significance	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>CalEEMod result sheets are provided in Appendix B of the AQ Report. Source: Cadence Environmental Consultants May 2013.</i>						

Cumulatively Considerable Net Increase of Criteria Pollutants

The mass daily and localized emissions generated by project construction and operational activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, the Proposed Project would not generate a cumulatively considerable net increase of criteria pollutants. This would be a less than significant cumulative impact.

Because the Basin is currently in nonattainment for ozone, NO₂, PM₁₀ and PM_{2.5}, related projects may likely exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Proposed Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily construction-related and operational emissions generated by the Proposed Project would not exceed any of thresholds of significance recommended by the SCAQMD. Also, as discussed below, localized emissions generated by the Proposed Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Proposed Project would not contribute a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment. The cumulative air quality impacts associated with the Proposed Project would be less than significant.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Emissions generated by the Proposed Project would not expose receptors in the vicinity of the Project Site to substantial pollutant concentrations. The impact of the project would be less than significant.

Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest sensitive receptors to the proposed Project Site are the residents of the 212-unit, five-story Museum Terrace Apartments building at 600 S. Curson Avenue. There are no schools in close proximity to the Project Site.

The SCAQMD has developed localized significance threshold (LST) look-up tables for Project Sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each SRA and various distances from the source of emissions. In the case of this analysis, the proposed Project Site is located within SRA 1 and the nearest homes are approximately 300 feet from the site. Therefore, the LSTs for a one-acre site and receptors located within 25 meters

are used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} impacts to the area surrounding the proposed Project Site.⁵

Localized Construction Emissions

Table IV.C-9 identifies the maximum daily emissions that are estimated to occur at the Project Site during the construction phases of the Proposed Project. As shown, emissions during the construction phases would not exceed the SCAQMD's LST for the specified pollutants. Therefore, impacts related to localized pollutant concentrations during construction would be less than significant.

**Table IV.C-9
Estimated Daily Localized Construction Emissions**

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition of Existing Surface Parking Lot				
Onsite Emissions	29.20	17.25	1.98	1.54
SCAQMD Localized Thresholds ^b	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
Site / Foundation Preparation				
Onsite Emissions	24.59	14.80	2.87	2.18
SCAQMD Localized Thresholds	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
Office Building and Parking Structure Construction (including architectural coatings)				
Onsite Emissions	39.09	29.40	2.87	2.87
SCAQMD Localized Thresholds	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
<p><i>Note: Localized thresholds for construction emissions at a 1-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 1.</i></p> <p><i>Calculation sheets are provided in Appendix B of the AQ Report</i></p> <p><i>Source: Cadence Environmental Consultants, May 2013.</i></p>				

Localized Operational Emissions

The average daily operational emissions that would be generated at the Proposed Project Site are shown in Table IV.C-10 along with the applicable operational LSTs for SRA 1. As shown on-site operational emissions generated by the new office building would not approach the established SCAQMD localized thresholds. Therefore, this impact would be less than significant.

⁵ The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters.

**Table IV.C-10
Estimated Daily Localized Operational Emissions**

Emission Source	Total On-site Emissions (Pounds per Day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area Sources	0.00	0.00	0.00	0.00
Energy Sources	0.75	0.63	0.06	0.06
Total Emissions	0.75	0.63	0.06	0.06
SCAQMD Localized Thresholds ^b	74.00	280.00	3.00	1.00
Significant Impact?	No	No	No	No
<i>Note: Localized thresholds for construction emissions at a 1-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 1.</i> <i>Calculation sheets are provided in Appendix B of the AQ Report</i> <i>Source: Cadence Environmental Consultants, May 2013.</i>				

Odors

The Proposed Project Site is located within the LA City Methane Zone. According to the Environmental Site Assessment - Phase I and Methane/Soil Testing report prepared for the Proposed Project, natural petroleum hydrocarbons are present in the shallow soil beneath the Site. The Environmental Site Assessment - Phase I and Methane/Soil Testing study reports that the soil beneath the Site has a natural petroleum odor, but that no strong, pungent or noxious odors were noted at the Project Site at the time of the Site reconnaissance work.⁶

Construction of the Proposed Project would expose soil that is currently overlain by the surface parking lot at the Project Site. This soil may emit a natural petroleum odor until it is resurfaced with the new building foundation and surface parking lot. Any such odors are expected to be low and similar to those that may occur in the unpaved areas of Hancock Park to the west. As discussed previously, the project construction activities would also be subject to Rule 403 for the control of fugitive dust. These fugitive dust control requirements would also help to reduce the potential for natural odors to be emitted by areas of dry exposed soil. Therefore, the potential construction-related impacts associated with objectionable odors would be less than significant.

Operational odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Proposed Project involves the construction and operation of a new office building and expanded parking structure, which are not typically associated with odor complaints. As the Proposed Project involves no elements related to industrial projects, no objectionable odors are anticipated. Therefore, the potential operational impacts associated with objectionable odors would be less than significant.

⁶ *Environmental Site Assessment - Phase I and Methane/Soil Testing, Proposed Office Development Project, Commercial Property, Portion of APN 5508-015-007, 5711 Wilshire Boulevard, Los Angeles, CA 90036. California Environmental. January 2013.*

Consistency with General Plan Air Quality Element

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions.

The Air Quality Element of the City of Los Angeles sets forth the goals, objectives, and policies that would guide the City in the implementation of its air quality improvement programs and strategies. A detailed analysis of the consistency of the Proposed Project with relevant policies in the City's General Plan Air Quality Element is presented in Table IV.C-11, Project Consistency with Applicable Policies of the General Plan Air Quality Element.

**Table IV.C-11
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

Policy	Consistency Analysis
<p>Policy 1.3.1: Minimize particulate emissions from construction sites.</p>	<p>Consistent. Construction activities associated with the Proposed Project would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, which would require appropriate dust control measures to be implemented during each phase of development. Consequently, particulate emissions at the Project Site during construction of the Proposed Project would be minimized. Therefore, the Proposed Project would be consistent with this policy.</p>
<p>Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.</p>	<p>Consistent. Construction activities associated with the Proposed Project would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, which would require appropriate dust control measures to be implemented during each phase of development. Some of these dust control measures include daily watering of unpaved areas, and reducing vehicle speed on unpaved areas to less than 15 miles per hour. Therefore, the Proposed Project would be consistent with this policy.</p>

**Table IV.C-11
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

Policy	Consistency Analysis
<p>Policy 4.2.2: Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.</p>	<p>Consistent. The Proposed Project is the redevelopment of an underutilized commercial site and will serve the local community. The Proposed Project is situated within easy walking distance to existing residential and other commercial businesses located along the Wilshire Boulevard / Miracle Mile corridor. Further, regional and local public bus transit stops are provided near the Project Site on Wilshire Boulevard. The nearest Metro rail line (Purple Line) Station is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Project Site. Work to bring the Metro Purple Line to the Westside of the City of Los Angeles is moving forward, with plans approved to add nine miles of subway. New Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue and Wilshire Boulevard and Fairfax Avenue. The proximity of the Project Site to these transit stops would allow employees easy access the proposed commercial uses. Therefore, the Proposed Project would be consistent with this policy.</p>

**Table IV.C-11
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

Policy	Consistency Analysis
<p>Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>	<p>Consistent. The Proposed Project is the redevelopment of an underutilized commercial site. The Project Site is located within close proximity to several multi-modal corridors such as Wilshire Boulevard, Fairfax Avenue and 6th Street. The characteristics of the nearby multi-modal corridors promote alternative transportation modes (e.g., pedestrian, bicycle, regional and local bus transit). The alternative transportation modes coexist and share the roadway, reinforcing the concept of a balanced and effective transportation system. In addition, the Proposed Project is situated within easy walking distance to existing residential development, as well as retail, restaurant, and other commercial businesses located along the Wilshire Boulevard corridor. Further, regional and local public bus transit stops are provided near the Project Site on Wilshire Boulevard and Fairfax Avenue. The nearest Metro rail line (Purple Line) Station is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Project Site. Work to bring the Metro Purple Line to the Westside of the City of Los Angeles is moving forward, with plans approved to add nine miles of subway. New Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue and Wilshire Boulevard and Fairfax Avenue. Thus, the Proposed Project would be consistent with this policy.</p>
<p>Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.</p>	<p>Consistent. The air quality analysis conducted for the Proposed Project in this Draft EIR serves to identify potential air quality impacts and, if necessary, recommend mitigation measures to reduce these impacts to a less than significant level. No significant and unavoidable impacts were identified for the Proposed Project in this Draft EIR. The analysis in this Draft EIR will be used by the City's Planning Commission in its review and approval process for the Proposed Project. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><i>Source: City of Los Angeles, General Plan Air Quality Element, Adopted November 1992; EcoTierra Consulting, June 2013.</i></p>	

The Proposed Project would be consistent with goals, objectives, and policies set forth in the City's General Plan Air Quality Element, as it would be generally consistent with the applicable air quality policies discussed above. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the General Plan.

Toxic Air Contaminants

As the Proposed Project would consist of the development of commercial uses, and would not include any land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, no toxic airborne emissions would result from its implementation. In addition, construction activities associated with the Proposed Project would be typical of other similar commercial developments in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of TACs from the Project Site would be less than significant.

4. CUMULATIVE IMPACTS

Because the area of the Basin is currently in nonattainment for ozone, NO₂, PM₁₀, and PM_{2.5}, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the proposed project contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. As discussed previously in this report, the maximum mass daily and localized construction-related and operational emissions associated with the Proposed Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, the Proposed Project would not contribute a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment. The cumulative air quality impacts associated with the Proposed Project would be less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Proposed Project would not create any unavoidable significant air quality impacts and no mitigation measures are necessary.

IV. ENVIRONMENTAL IMPACT ANALYSIS

D. CULTURAL RESOURCES

1. INTRODUCTION

This section discusses the potential impacts of the project on cultural resources, including historical, archaeological and paleontological resources.

2. ENVIRONMENTAL SETTING

Project Site Description and History

The Project Site is fully developed with an 11-story commercial office complex with an associated surface parking lot and parking structure. The existing building complex is located on the southern approximately one-half of the lot with a surface parking area and parking structure located on the northern half of the lot.

Sanborn Fire Insurance maps provide historical land use information in some metropolitan areas. Sanborn maps were reviewed for the Project Site for the years 1927, 1950, and 1969. Historical aerial photographs were also reviewed for the years 1947, 1956, 1965, 1976, 1989, 1994 and 2005. Historical site utilization research indicates that the portion of Proposed Project Site to be developed with the office building component was undeveloped until a surface parking lot was constructed during the early 1950s. This portion of the Project Site remains utilized as an at-grade parking facility.¹

The existing office building complex was originally constructed in 1948 as the Prudential Insurance Company Building. The existing five-story parking structure was approved and constructed in 1983.

Historical Resources

Definition of Historical Resources

Section 15064.5 of the State CEQA Guidelines defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is

¹ *Environmental Site Assessment Phase I and Methane Soil Testing, Proposed Office Development Project, Commercial Property, Portion of APN 5508-015-007, 5711 Wilshire Boulevard, Los Angeles, CA 90036, by California Environmental Geologists and Engineers, dated January 2013.*

supported by substantial evidence in light of the whole record. A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

Project Site Description and History

As previously discussed, the existing office building complex was originally constructed in 1948 as the Prudential Insurance Company Building. However, substantial renovations and improvements have been made to the building since that time and due to the extent of these changes, the building has not been listed in a local, State or national historic preservation register, nor has it been determined eligible for historic designation. Further, according to the City of Los Angeles Parcel Profile Report, the Project Site is not located within any Historic Preservation Overlay Zones.²

The neighboring 20-acre, seven-building LACMA campus and Hancock Park is listed as State Monument #170 (La Brea Tar Pits).³

Archaeological Resources

Definition of Archaeological Resources

According to the Archaeological Resources Protection Act of 1979, “the term ‘archaeological resource’ means any material remains of past human life or activities which are of archeological interest, as determined under uniform regulations promulgated pursuant to this Act. Such regulations containing such determination shall include, but not be limited to: pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Non-fossilized and fossilized paleontological specimens, or any portions or piece thereof, shall not be considered archeological resources, under the regulations under this paragraph, unless found in an archaeological context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age.⁴ Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources, which meet the criteria for historical resources, as discussed above, or which constitute unique archaeological resources.

Project Site Description and History

² City of Los Angeles Department of Planning, *Zone Information and Map Access System, 5701 W. Wilshire Blvd (et al)*, website: <http://zimas.lacity.org/>, November 28, 2012.

³ City of Los Angeles, Department of City Planning, *Historic-Cultural Monument (HCM) Report, Wilshire Planning Community*, website: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result.cfm?community=Wilshire, accessed December 21, 2012.

⁴ Archeological Resources Protection Act of 1979 (as amended), Section 3, http://www.cr.nps.gov/local-law/FHPL_ArchRsrcsProt.pdf, accessed November 3, 2011.

The Proposed Project is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance, including the construction of a parking structure and surface parking lot. Any archaeological resources that may have existed near the Site surface are likely to have been disturbed or previously removed. However, the Proposed Project site is located in an area designated by the City of Los Angeles Planning Department as being an Archeological Survey Area.⁵ Therefore there is the potential that unknown archaeological resources may be located below the surface on the Project Site.

Paleontological Resources

Definition of Paleontological Resources

Paleontological resources include fossil remains, fossil localities, and formations that have produced fossil material in other nearby areas. Paleontological resources are limited, nonrenewable, sensitive scientific resources, including fossils preserved either as impressions of soft (fleshy) or hard (skeletal) parts, mineralized remains of skeletons, tracks, or burrows, or other trace fossils, coprolites (fossilized excrement), seeds or pollen, and other microfossils from terrestrial, aquatic, or aerial organisms.

Assessment of the Paleontological Potential of Rock Units

Rock units are described as having (a) high, (b) undetermined, (c) low, or (d) no potential for containing significant paleontological resources.

High Potential

Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rock units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcanoclastic formations (e. g., ashes or tephra), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.). Paleontological potential consists of both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, plant, or trace fossils and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data. Rock units which contain potentially datable organic remains older than late Holocene, including deposits associated with animal nests or middens, and rock units which may contain new vertebrate deposits, traces, or trackways are also classified as having high potential.

⁵ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, Figure CR-1, September 1996. http://cityplanning.lacity.org/HousingInitiatives/HousingElement/frameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI_R2.15.pdf, accessed January 8, 2013.*

Undetermined Potential

Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist (see “definitions” section in this document) to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.

Low Potential

Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.

No Potential

Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection or impact mitigation measures relative to paleontological resources.

Project Site Description and History

The Proposed Project Site is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance including the construction of a parking structure and surface parking lot and as such, no unique geologic features are located on the Site.

No paleontological resources have been discovered on the site to date. However, the Proposed Project site is located near an area designated by the City of Los Angeles Planning Department as being a Vertebrate Paleontological Resources Site and an Invertebrate Paleontological Resources Sensitivity Area.⁶ Therefore there is the potential that unknown paleontological resources may be located below the surface on the Project Site.

⁶ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, Figures CR-2 and CR-3, September 1996.*
http://cityplanning.lacity.org/HousingInitiatives/HousingElement/frameworkEIR/GPF_DraftEIR/GPF_FEIR_DEI_R2.15.pdf, accessed January 8, 2013.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with Appendix G to the State CEQA Guidelines, a project would have a significant effect on cultural and historical resources if it would:

- a) Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5;
- b) Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5;
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- d) Disturb any human remains, including those interred outside of formal cemeteries.

City of Los Angeles CEQA Thresholds Guidelines

Historical Resources

In accordance with the *L.A. CEQA Thresholds Guide (2006)*, for impacts related to historical resources, a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource.

A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity of significance of important resources on the site or in the vicinity.

Archeological Resources

In accordance with the *L.A. CEQA Thresholds Guide (2006)*, for impacts related to archeological resources, a project would normally have a significant impact upon archeological resources if it could disturb, damage, or degrade archeological resources or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;

- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100-years-old and possess substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archeological methods.

Paleontological Resources

In accordance with the *L.A. CEQA Thresholds Guide (2006)*, for impacts related to paleontological resources, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

Project Characteristics

The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot (refer to Figure II-3, Parcel Survey Map). The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building. Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to the existing five-level parking.

The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

While building plans are still in the preliminary phase, in order to minimize excavation in a sensitive cultural resource area and a methane zone, the foundation system for the new office building will most likely consist of a mat footing supporting the core of the building, which is the central area of the building housing the elevators, stairwells, electrical and climate control equipment, restrooms, and other facilities. The mat footing will require excavation to a depth of approximately six to eight feet, and would match the footprint of the core of the building, approximately 2,700 sf (13.4%) of the total building footprint of approximately 20,010 sf. The remaining structural elements for the building would consist of approximately 20 perimeter column footings/foundations which would extend to a depth of approximately 2'-6".

Project Impacts

Historical Resources

As previously discussed, due to the substantial renovations and improvements that have been made to the buildings on the Project Site since their construction, the Project Site has not been listed in a local, state or national historic preservation register, nor has it been determined eligible for historic designation. Further, according to the City of Los Angeles Parcel Profile Report, the Project Site is not located within any Historic Preservation Overlay Zones.⁷

The neighboring 20-acre, seven-building LACMA campus and Hancock Park is listed as State Monument #170 (La Brea Tar Pits).⁸ However, as discussed under Aesthetics in section IV.A., Impacts Found to be Less Than Significant, the Proposed Project would not introduce incompatible visual elements to the Project Site or to the surrounding area. As such, the Proposed Project would not cause any substantial adverse change in the immediate surroundings such that the significance of a historical resource would be materially impaired.

Therefore the Proposed Project would not cause any substantial adverse change to any historical resource and there would be no impact. No mitigation is required.

Archaeological Resources

As previously discussed, the Proposed Project Site is located in an urbanized area, which has been previously disturbed by construction activities, including the construction of a parking structure and surface parking lot. Any archaeological resources that may have existed near the Site surface are likely to have been disturbed or previously removed. However, the Proposed Project Site is located in an area designated by the City of Los Angeles Planning Department as being an Archeological Survey Area.⁹ Therefore there is the potential that unknown archaeological resources may be located below the surface on the Project Site and because impacts to these resources would be unknown until encountered during excavation, impacts to such resources are considered significant. Mitigation is required to reduce the potential for damage to any such resource located on Project Site.

Paleontological Resources

As previously discussed, no unique geologic features are located on the Proposed Project Site, which is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance including the construction of a parking structure and surface parking lot. Paleontological resources have not been discovered on the site to date. However, the Proposed Project Site is located nearby an area

⁷ ZIMAS, *Op cit.*

⁸ HCM Report, *Op cit.*

⁹ *Environmental and Public Facilities Maps: Figure CR-1, Op cit.*

designated by the City of Los Angeles Planning Department as being Vertebrate Paleontological Resources Site and an Invertebrate Paleontological Resources Sensitivity Area.¹⁰

The only excavations anticipated for the Proposed Project are those associated with foundations and utilities, and these excavations are not expected to be greater than six to eight feet, and would match the footprint of the core of the building, approximately 2,700 sf (13.4%) of the total building footprint of approximately 20,010 sf. The remaining structural elements for the building would consist of approximately 20 perimeter column footings/foundations which would extend to a depth of approximately 2'-6". Nevertheless, since paleontological resources could be located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources are considered significant, and mitigation is required to reduce the potential for damage to any such resource located on Project Site.

Human Remains

No known human burials have been identified on the Proposed Project Site or within recorded resources located in the vicinity. See also analysis of archaeological resources above. While it is possible that human remains could be discovered during construction activities, it is highly unlikely due to the previously disturbed nature of the Project Site. Nevertheless, since human remains could be located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be considered significant but can be reduced to less than significant levels with implementation of the regulatory compliance measure listed below.

4. CUMULATIVE IMPACTS

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. It is anticipated that comparable measures and compliance with existing regulations would be incorporated into the approval of each related project. Additionally, as discussed above, the Proposed Project would not result in any impacts to historic resources. As such, cumulative impacts to cultural resources would be less than significant.

5. REGULATORY COMPLIANCE AND MITIGATION MEASURES

Historic Resources

No impacts to historic resources would occur with Project implementation; therefore, no mitigation measures are required.

¹⁰ *Environmental and Public Facilities Maps: Figures CR-2 and CR-3, Op cit.*

Mitigation Measures:

The following measures are required due to the potential that archaeological or paleontological resources or human remains may be impacted by the Proposed Project.

Archaeological Resources

- MM-CUL-1** The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or an archaeologist who meets the Secretary of the Interior's guidelines and is listed in the Register of Professional Archaeologists, who shall be present to monitor all ground-disturbing activities associated with the Project.
- MM-CUL-2** Prior to initiation of ground-disturbing activities, the Project Archaeologist shall conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training, which could be held in conjunction with the Project's initial on-site safety meeting and paleontological resources training, shall explain the importance of and legal basis for the protection of significant archaeological resources.
- MM-CUL-3** In the event that archaeological resources are exposed during ground-disturbing activities, work in the immediate vicinity of the find shall stop until the Project Archaeologist can evaluate the significance of the find. Construction activities may continue in other areas.
- MM-CUL-4** If the discovered cultural materials are prehistoric in nature or include Native American remains, the Project Archaeologist shall arrange for a Native American monitor to be retained to assist in the identification of the resources or human remains. The Native American monitor shall be retained from a list of suitable candidates from the Native American Heritage Commission.
- MM-CUL-5** The Archaeologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating Archaeologist, as contained in the survey, study, or report. Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

South Central Coastal Information Center
Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834

Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.

Paleontological Resources

- MM-CUL-6** The Project Applicant shall identify and engage a qualified paleontologist by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum prior to any ground-disturbing activities. The City of Los Angeles Planning Department shall approve the selected paleontologist prior to issuance of the grading permit.
- MM-CUL-7** The Project Paleontologist shall attend the pre-grading meeting to discuss how to recognize paleontological resources in the soil during grading activities. The prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying or removing sensitive scientific resources, including fossils preserved either as impressions of soft (fleshy) or hard (skeletal) parts, mineralized remains of skeletons, tracks, or burrows, or other trace fossils, coprolites (fossilized excrement), seeds or pollen, and other microfossils from terrestrial, aquatic, or aerial organisms from the Proposed Project Site.
- MM-CUL-8** If any paleontological materials are encountered during ground-disturbing activities, work in the immediate area shall be halted. The Project Paleontologist shall be called in to assess the resources and evaluate the impact. Any discovery of paleontological resources shall be treated in accordance with Society of Vertebrate Paleontology guidelines for identification, evaluation, disclosure, avoidance or recovery, and curation, as appropriate.
- MM-CUL-9** The Project Paleontologist shall then prepare a report summarizing the results of the monitoring program including methods of fossil recovery and curation, and a description of the fossils collected and their significance. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Any recovered fossils and a copy of the report will be deposited in an accredited curation facility.
- MM-CUL-10** Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological and/or paleontological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Applicant to this condition shall be recorded prior to issuance of a grading permit.

Regulatory Compliance Measure:**Human Remains**

- RC-CUL-1** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- a) Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033

323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- b) The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- c) The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- d) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

There are no Project impacts on historic resources.

Impacts to archaeological resources, human remains and paleontological resources are potentially significant as a result of the construction of the Proposed Project. However, implementation of Regulatory Compliance Measures RC-CUL-1 and Mitigation Measures MM-CUL-1 through MM-CUL-10 provided above would ensure that the potential for impacts would be reduced to a less than significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS

E. GREENHOUSE GASES/GLOBAL CLIMATE CHANGE

1. INTRODUCTION

This Greenhouse Gas (GHG) Impact Analysis has been prepared to evaluate the potential environmental impacts associated with the proposed new Museum Square Office building project (Proposed Project). The purpose of this analysis is to identify the construction-related and operational GHG emissions that would be generated by the Proposed Project and compare these with the thresholds of significance recommended by the South Coast Air Quality Management District (SCAQMD). This analysis also evaluates the consistency of the Proposed Project with the applicable policies that have been adopted to reduce state-wide GHG emissions.

The following section summarizes the information provided in the technical report entitled Greenhouse Gas Impact Analysis for the Museum Square Office Building (the “GHG Report”), prepared by Cadence Environmental Consultants, Inc., in October 2013. The GHG Report, including all calculation data is incorporated herein by this reference, and provided as Appendix IV.E-1 to this EIR.

There are several unique challenges to analyzing greenhouse gas emissions and climate change under the California Environmental Quality Act (“CEQA”), largely because of the “global” nature of climate change. Typical CEQA analyses address local actions that have local – or, at most, regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the “project-specific” impacts that a particular project is likely to generate. With regard to global climate change, however, it is generally accepted that while the magnitude of global warming effects is substantial, the contribution of an individual general development project is so small that direct project-specific significant impacts (albeit not cumulative significant impacts) are highly unlikely.

Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region or area. Instead, a global climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly “new” emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions, or are merely being moved from one place to another. For example, the approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project’s emissions. Rather, due to the “relocation” factor, new land use projects sometimes merely redistribute existing mobile emissions;¹ accordingly, the use of models that measure overall emissions increases

¹ For example, a subdivision of 500 homes generates 5,000 new trips per day and those trips would be added to the local streets and intersections. In the case of climate change, the trips that are associated with those same

without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air quality impacts, where the “addition” of redistributed emissions to a new locale can make a substantial difference to overall air quality.

2. ENVIRONMENTAL SETTING

A. Global Climate Change

The earth’s natural warming process is known as the “greenhouse effect.” Certain atmospheric gases act as an insulating blanket for solar energy to keep the global average temperature in a suitable range for life support. These gases are called ‘greenhouse gases’ (“GHGs”) because they trap heat like the glass walls of a greenhouse. The greenhouse effect raises the temperature of the earth’s surface by about sixty degrees Fahrenheit. With the natural greenhouse effect, the average temperature of the earth is about 45 degrees Fahrenheit; without it, the earth would be about minus 15 degrees. It is normal for the earth’s temperature to fluctuate over extended periods of time. Over the past one hundred years, the earth’s average global temperature has generally increased by one degree Fahrenheit. In some regions of the world, the increase has been as much as four degrees Fahrenheit.

Scientists studying the particularly rapid rise in global temperatures during the late twentieth century believe that natural variability alone does not account for that rise. Rather, human activity spawned by the industrial revolution has likely resulted in increased emissions of carbon dioxide and other forms of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste. The most common GHG is carbon dioxide (CO₂), which constitutes approximately 84 percent of all GHG emissions in California.² Worldwide, the state of California ranks as the 12th to 16th largest emitter of CO₂ and is responsible for approximately two percent of the world’s CO₂ emissions.³

Scientists refer to the global warming context of the past century as the “enhanced greenhouse effect” to distinguish it from the natural greenhouse effect. While the increase in temperature is known as “global warming,” the resulting change in weather patterns is known as “global climate change.” Global climate change is evidenced in changes to wind patterns, storms, precipitation, and air temperature.

B. Global Warming Potential

Global Warming Potentials (GWPs) are one type of simplified index based upon radiative properties that can be used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-

500 homes presumably would emit roughly the same volume of GHGs in the City of Los Angeles as they would if they were traveling the same number of miles in Cleveland, Ohio. As a result, while raw vehicle trip counts occurring within a project area will accurately predict changes in congestion at intersections, the same certainty cannot be provided for climate change. The trips would certainly increase the number of vehicles passing through local intersections, but they will not increase the amount of GHG emissions into the world’s atmosphere if those trips simply have been relocated from another location on the planet.

² California Energy Commission, 2006.

³ California Energy Commission, 2006.

absorbing ability) of each gas relative to that of CO₂, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO₂.

The U.S. Environmental Protection Agency (“U.S. EPA”) defines GWP as the “cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas,” the reference gas in this case being CO₂. One tetragram of CO₂ equivalent (“Tg CO₂ Eq.”) essentially equals the emissions of the gas multiplied by the GWP. One tetragram is equal to one million metric tons. A summary of the atmospheric lifetime and GWP of selected gases is presented in Table IV.E-1 (Atmospheric Lifetimes and Global Warming Potentials of Greenhouse Gases). As indicated, GWP ranges from 1 to 23,900.

**Table IV.E-1
Atmospheric Lifetimes and Global Warming Potentials of Greenhouse Gases**

Gas	Atmospheric Lifetime (Years)	Global Warming Potential (100 Year Time Horizon)
Carbon Dioxide	50-200	1
Methane	12 (±3)	21
Nitrous Oxide	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CF ₄)	50,000	6,500
PFC: Hexafluoromethane (C ₂ F ₆)	10,000	9,200
Sulfur Hexafluoride (SF ₆)	3,200	23,900

Source: Intergovernmental Panel on Climate Change, 1995.

C. GHG Inventory

Data compiled by the United Nations Framework Convention on Climate Change (“UNFCCC”) indicates that, in 2006, total worldwide GHG emissions were 22,170 million metric tons of carbon dioxide equivalents (“MMTCO₂E”), emissions in the U.S. were 7054.2 MMTCO₂E, and emissions in California were 483.9 MMTCO₂E.

While California has a high amount of total GHG emissions, it has low emissions per capita. California ranks fourth lowest of the 50 states in carbon dioxide emissions per capita. The major source of GHG in California is transportation, contributing approximately 41 percent of the state’s total GHG emissions. Electricity generation is the second largest generator, contributing approximately 22 percent of the state’s GHG emissions.

Emissions from fuel use in the commercial and residential sectors in California decreased approximately 9.7 percent over the 1990-to-2004 period. The decrease in GHGs could demonstrate the effectiveness of energy conservation in buildings (Title 24 requirements) and appliances. The decrease in GHGs attributed to these sources is even more substantial when the population increase in California over this same time period is considered.

D. GHG Components and Health Effects

The California Global Warming Solutions Act of 2006 (see below) defined GHGs to include CO₂, methane, nitrogen oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. California SB 104 (approved by the Governor on October 11, 2009) added nitrogen trifluoride to this list. Below is a description of these GHGs.

CO₂ is an odorless and colorless GHG. Outdoor levels of carbon dioxide are not high enough to result in negative health effects. CO₂ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO₂ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks.

Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO₂ concentrations were fairly stable at 280 parts per million (“ppm”) by volume. Today, they are around 370 ppm; an increase of more than 30 percent. Left unchecked, the concentration of CO₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources.

Methane (CH₄) is an extremely effective absorber of radiation, though its atmospheric concentration is less than CO₂ and its lifetime in the atmosphere is brief (10-12 years) when compared to other GHGs. No health effects are known to occur from exposure to methane.

Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Nitrous oxide (N₂O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney’s Lesions (brain damage).

Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (“ppb”) by volume. Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the earth’s surface, and be converted to other compounds by chemical reaction.

Hydrofluorocarbons (“HFCs”) are synthetic, man-made chemicals that are used as a substitute for chlorofluorocarbons (“CFCs”), which were previously banned for destroying the ozone layer. Out of all the greenhouse gases, HFCs are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂). Prior to 1990, the only significant emissions were of HFC-23. HFC-

134a emissions are increasing due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (“ppt”) by volume each; and that concentrations of HFC-152a are about 1 ppt. No health effects are known to result from exposure to HFCs, which are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons (“PFCs”) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth’s surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes; between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The U.S. EPA estimates that concentrations of CF₄ in the atmosphere are over 70 ppt.

No health effects are known to result from exposure to PFCs. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The U.S. EPA indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

E. Projected Impacts of Global Climate Change in California

In February 2006, the California Environmental Protection Agency (“CalEPA”) published a report titled Scenarios of Climate Change in California: An Overview (“Climate Scenarios report”) that, while not adequate for a CEQA project-specific or cumulative analysis, is generally instructive about the potential impacts of global climate change on California.

The Climate Scenarios report uses a range of emissions scenarios developed by the Intergovernmental Panel on Climate Change (“IPCC”) to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0 - 5.5°F); medium warming range (5.5 - 8.0°F); and higher warming range (8.0 - 10.5°F). The Climate Scenarios report then presents an analysis of future climate in California under each warming range that, while uncertain, present a picture of the potential impacts of global climate change trends in California.

In addition, most recently on December 2, 2009, the California Natural Resources Agency released its California Climate Adaptation Strategy report that details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes. This analysis responds to the Governor’s Executive Order S-13-2008 that called on state agencies to develop California’s strategy to identify and prepare for expected climate impacts.

According to these reports, substantial temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming.

Under the emissions scenarios of the Climate Scenarios report, the impacts of global climate change in California have the potential to include, but are not limited to, the areas of public health, water

resources, agriculture, forests and landscapes, and rising sea levels. Each of these areas are discussed below.

i) Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35 percent under the lower warming range to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

ii) Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies upon Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If GHG emissions continue unabated, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

The state's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major state fresh water supply.

iii) Agriculture

Increased GHG emissions could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25 percent of the water supply they need. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water

demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits and nuts.

In addition, continued global climate change could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued global climate change could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

iv) Forests and Landscapes

Global climate change has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90 percent due to decreased precipitation.

Moreover, continued global climate change has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80 percent by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of global climate change.

v) Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Sea levels along the California coast have risen up to 7 inches over the last century. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches.

F. Regulatory Setting

Climate change and GHG emissions are governed by an increasingly evolving body of treaties, laws, regulations, and case law. Below are summaries of some of the key regulations; however, the discussion below should not be considered exhaustive of this ever-growing body of regulation.

i) International Regulations

In 1988, the United Nations established the IPCC to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change ("UNFCCC") agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs.

The Kyoto protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Kyoto protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the United States is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments.

In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto, but no binding agreements were reached.

ii) Federal Regulations

Previously, the U.S. EPA had not regulated GHGs under the federal Clean Air Act ("CAA") because it asserted that the CAA did not authorize it to issue mandatory regulations to address global climate change and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007)), however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. On December 7, 2009, the U.S. EPA issued an Endangerment Finding under Section 202(a) of the CAA, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the EPA has not promulgated major regulations on GHG emissions, although it has begun to develop them.

The U.S. EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representatives and Senate have been controversial and it may be some time before Congress adopts major climate change legislation. The U.S. EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. To date, Congress, under the Consolidated Appropriations Act of 2008 (HR 2764), has established mandatory GHG reporting requirements for some emitters of GHGs. On September 22, 2009, the U.S. EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the U.S. EPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons or more a year of GHGs.

iii) California Regulations

1) Executive Order S-3-05

Notwithstanding the current lack of federal regulation of greenhouse gas emissions, Executive Order S-3-05, signed by Governor Arnold Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions below 1990 levels by 2050 in

California. The Secretary of CalEPA has been charged with coordination of efforts to meet these targets and formed the Climate Action Team to implement the Order. The Climate Action Team (CAT) also provided strategies and input to the California Air Resources Board Scoping Plan discussed below.

2) Assembly Bill 32

In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. In adopting this legislation (commonly known as AB 32), the State Legislature declared that “global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.” Further, the Legislature found that “the potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious disease, asthma, and other human health-related problems.” The Legislature added that “global warming will have detrimental effects on some of California’s largest industries” and “increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the state.”

AB 32 initiated a long-term program for “the development of [GHG] emissions reduction measures.”⁴ It “creates a comprehensive, multi-year program to reduce greenhouse gas (GHG) emissions in California, with the overall goal of restoring emissions to 1990 levels by the year 2020.”⁵ AB 32 recognizes that such an ambitious effort requires careful planning and a well thought out set of strategies. Accordingly, AB 32 delegated the authority for its implementation to the California Air Resources Board (“ARB”) and directs the ARB to enforce the statewide cap that would begin phasing in by 2012. Amongst other requirements, AB 32 required the ARB to (1) identify the statewide level of greenhouse gas emissions in 1990 to serve as the emissions limit to be achieved by 2020, and (2) develop and implement a Scoping Plan to be implemented by January 1, 2012.

In November 2007, the ARB completed its estimates of 1990 GHG levels. Net emission 1990 levels were estimated at 427 MMTs (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent).⁶ Accordingly, 427 MMTs of CO₂ equivalent was established as the emissions limit for 2020. For comparison, the ARB’s estimate for 2000 baseline GHG emissions was 473 MMT for 2000 and 532 MMT for 2010. “Business as usual” conditions for 2020 were projected to be 596 MMTs. Therefore to comply with AB 32’s mandate, GHG emission would need to be reduced from 596 MMTs (i.e., 2020 “business as usual”) to 427 MMTs (the 1990 level), which is a reduction of 30 percent. This latter forecast did not take any credit for reductions from measures included in the AB 32 Scoping Plan, including the Pavley GHG emissions standards for vehicles, full implementation of the Renewables Portfolio Standard beyond current levels of renewable energy, or the solar measures.

⁴ As defined under AB 32, greenhouse gas emissions include the following: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride.

⁵ Written on a public notice prepared by the staff of the California Air Resources Board in connection with a meeting to consider “early discrete actions” related to AB 32 on October 25, 2007.

⁶ On a national level, the U.S. EPA’s Endangerment Finding stated that electricity generation is the largest emitting sector (34%), followed by transportation (28%), and industry (19%).

Under AB 32, the ARB published its Final Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California. The ARB has 44 early action measures that apply to the transportation, commercial, forestry, agriculture, cement, oil and gas, fire suppression, fuels, education, energy efficiency, electricity, and waste sectors. Of these early action measures, nine were deemed discrete early action measures in that they were regulatory and enforceable by January 1, 2010. The ARB estimates that the 44 recommendations will result in reductions of at least 42 MMTs by 2020, representing approximately 25 percent of the 2020 target.

In December 2007, the ARB approved a regulation for mandatory reporting and verification of GHG emissions for major sources. This regulation covered major stationary sources such as cement plants, oil refineries, electric generating facilities/providers, and co-generation facilities, which comprise 94 percent of the point source CO₂ emissions in the state.

On December 11, 2008, the ARB adopted a scoping plan to reduce GHG emissions to 1990 levels. The Scoping Plan's recommendations for reducing GHG emissions to 1990 levels by 2020 include emission reduction measures, including a cap-and-trade program linked to Western Climate Initiative partner jurisdictions, green building strategies, recycling and waste-related measures, as well as Voluntary Early Actions and Reductions. According to the September 23, 2010 AB 32 Climate Change Scoping Plan Progress Report, 40 percent of the reductions identified in the Scoping Plan have been secured through ARB actions and California is on track to its 2020 goal.⁷

3) Renewable Portfolio Standard

In 2002, SB 1078 required electric utilities to increase procurement of power generated by eligible renewable energy sources to 20 percent of total generation by 2017. In 2006, SB 107 accelerated the timetable to require 20 percent renewable energy by 2010. Then, in 2008, the Governor signed Executive Order S-14-08 which increased the required renewables content to 33 percent by 2020. In September 2009, the Governor signed Executive Order S-21-09 which directed the ARB to adopt regulations consistent with the 33 percent renewable energy target in Executive Order S-14-08 by July 31, 2010.

4) Title 24

Although not originally intended to reduce greenhouse gas emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2013 Title 24 standards (most of which are effective as of January 1, 2014, with remaining sections effective July 1, 2014) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2014 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). The outdoor water use standards of the CALGreen Code are already addressed by the City's Water

⁷ *California Air Resources Board, 2010.*

Conservation Ordinance. Key provisions of the CALGreen Code that apply to the type of new nonresidential developments proposed for the Project Site are as follows:

- Division 5.1 - Planning and Design
 - Section 5.106 Site Development
 - 5.106.4 Bicycle Parking and Changing Rooms
 - 5.106.5 Clean Air Vehicle Parking
 - 5.106.8 Light Pollution Reduction
 - 5.106.10 Grading and Paving
- Division 5.2 - Energy Efficiency
- Division 5.3 - Water Efficiency and Conservation
 - Section 5.303 Indoor Water Use
 - 5.303.1 Meters
 - 5.303.2 Twenty Percent Savings (use of plumbing fixtures and fittings that will reduce the overall use of potable water within the building by 20 percent reduction from the maximum allowable water use per fixture and fitting as required by the California Building Code (California Code of Regulations, Title 24, Part 2)
 - 5.303.4 Wastewater Reduction
 - 5.303.6 Plumbing Fixtures and Fittings
 - Section 5.304 Outdoor Water Use
 - 5.304.1 Water Budget
 - 5.304.2 Outdoor Water Use
 - 5.304.3 Irrigation Design Division 5.4 - Material Conservation and Resource Efficiency
- Division 5.4 - Material Conservation and Resource Efficiency
 - Section 5.407 Water Resistance and Moisture Management
 - Section 5.408 Construction Waste Reduction, Disposal and Recycling
 - 5.408.1 Construction Waste Diversion
 - 5.408.2 Construction Waste Management Plan
 - 5.408.3 Construction Waste Diversion of at Least 50 Percent
 - Section 5.410 Building Maintenance and Operation
 - 5.410.1 Recycling by Occupants
- Division 5.5 - Environmental Quality

- Section 5.504 Pollutant Control
 - 5.504.3 Covering of Duct Openings and Protection of Mechanical Equipment During Construction
 - 5.504.4 Finish Material Pollutant Control
 - 5.404.5.3 Filters

5) SB 1368

Passed in 2006, SB 1368 directs the California Public Utilities Commission to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 reduces carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Because of the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as combined cycle natural gas plants. Overall, SB 1368 will dramatically lower GHG emissions associated with California's energy demand as it will effectively prohibit California utilities from purchasing power from out-of-state producers that cannot satisfy the required performance standard.

6) SB 375

In September 2008, the California legislature adopted SB 375, legislation which: (1) relaxes CEQA requirements for some housing projects that meet goals for reducing GHG emissions and (2) requires the regional governing bodies in each of the state's major metropolitan areas to adopt, as part of their regional transportation plan, "sustainable community strategies" that will meet the region's target for reducing GHG emissions. SB 375 creates incentives for implementing the sustainable community strategies by allocating federal transportation funds only to projects that are consistent with the emissions reductions.

Local governments would then devise strategies for housing development, road-building and other land uses to shorten travel distances, reduce vehicular travel time and meet the new targets. If regions develop these integrated land use, housing, and transportation plans, residential projects that conform to the sustainable community strategy (and therefore contribute to GHG reduction) can have a more streamlined environmental review process.

7) California Green Building Code

The 2013 California Green Building Standards Code, referred to as CALGreen, became effective on January 1, 2014. CALGreen sets minimum standards that all new structures can meet to minimize significantly the state's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new CALGreen standards. The CALGreen Standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

CALGreen requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. CALGreen's mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs in a slow economy.

CALGreen also has more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The nonresidential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

The code addresses the critical issue of compliance verification by utilizing the existing building code enforcement infrastructure. The mandatory CALGreen measures will be inspected and verified by local building departments, using special inspectors as they determine necessary.

iv) Regional Regulations

The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control within the South Coast Air Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments, county transportation commissions, and local governments and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. As of the present date, the only regulation adopted by the SCAQMD addressing the generation of GHG emissions is the establishment of a 10,000 MTCO₂E per year screening level threshold of significance for stationary/source/industrial projects for which the SCAQMD is the lead agency.

v) City of Los Angeles

The City of Los Angeles adopted the pertinent provisions of the 2013 CALGreen standards through Ordinance No. 182,849, adopted December 17, 2013.

Prior to this and the adoption of previous Green Building Ordinances, the City of Los Angeles began to address the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City of Los Angeles is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

In December 2013, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 182849, thus codifying certain provisions of the 2013 CALGreen Code as the new Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code, and is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings.

G. Existing Project Site Emissions

The total Museum Square site is approximately 7.5 acres (327,613 square feet) in area and is fully developed with a commercial office complex with an associated surface parking lot and parking structure. The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot. The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building. Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story commercial office building and the addition of two new levels of parking to the existing five-level parking. No structures are located on the portion of the site proposed for the new office building. Therefore, the site for the proposed new office building does not support uses that generate GHG emissions.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

Notwithstanding the analytical challenges posed by climate change, CEQA Guidelines Section 15002(a)(1) states that one of the basic purposes of CEQA is to “inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.” Therefore, this evaluation of the proposed project’s potential for contribution to global climate change will analyze that potential in a manner and to an extent reasonably consistent with the policy underpinnings of CEQA.

This analysis is the result of the investigation of the proposed project’s impact on global climate change, including a review of Executive Order S-305, AB 32 and the legislative intent behind AB 32, as well as review of scientific literature regarding global climate change. Every effort has been made to maximize the disclosure of information to the public, fairly present the proposed project’s potential for significant adverse effects on global climate change, and identify techniques to minimize any such effects.

The analysis has been prepared in accordance with the requirements set forth in Section 15164.4 and Appendix G of the CEQA Guidelines, which became effective on March 18, 2010.

Section 15064.4 of the revised CEQA Guidelines that became effective on March 18, 2010 states:

- (b) A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:
- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
 - (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
 - (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Appendix G to the State CEQA Guidelines

In accordance with Appendix G to the CEQA Guidelines, a project could have a potentially significant impact associated with GHG emissions if any of the following were to occur:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHG.

CEQA defines a "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment.⁸ With respect to global climate change, no one project can individually create a direct impact on what is a global problem (i.e., no project will, by itself, raise the temperature of the planet).

However, the emissions generated by a project may be "cumulatively considerable," meaning "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."⁹ The CEQA Guidelines add that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.¹⁰

⁸ *Public Resources Code Section 21068.*

⁹ *CEQA Guidelines Section 15065(a)(3).*

¹⁰ *CEQA Guidelines Section 15064(h)(3).*

As stated above, the Proposed Project does not have the potential to significantly impact climate change at the project-specific level. However, the City has found that the Proposed Project may have a potentially significant cumulative impact and therefore an analysis of climate change impacts is provided below.

Generally, the evaluation of an impact under CEQA requires measuring data from a project against a “threshold of significance.”¹¹ Furthermore, “when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”¹² For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact.

The City of Los Angeles relies upon the expert guidance of the SCAQMD regarding the methodology and thresholds of significance for the evaluation of air quality impacts within the South Coast Air Basin. GHG emissions are air pollutants that are subject to local control by the SCAQMD. As such, the City looks to the SCAQMD for guidance in the evaluation of GHG impacts.

The SCAQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the SCAQMD adopted an interim 10,000 MTCO₂E per year screening level threshold for stationary source/ industrial projects for which the SCAQMD is the lead agency. The SCAQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

- Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO₂E/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO₂E/year), commercial projects (1,400 MTCO₂E/ year), and mixed-use projects (3,000 MTCO₂E/year). Under option 2 a single numerical screening threshold of 3,000 MTCO₂E/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MTCO₂E per service population for project level analyses and 6.6 MTCO₂E per service

¹¹ CEQA Guidelines Section 15064.7.

¹² CEQA Guidelines Section 15064.7(c).

population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

However, for the purpose of evaluating the GHG impacts associated with the Proposed Project, this analysis utilizes the SCAQMD's draft tiered thresholds. The SCAQMD's draft thresholds have also been utilized for other projects in the City of Los Angeles.

B. Green Building and Sustainability

While building plans are still in the preliminary phase, the Proposed Project would be designed to meet all provisions of CALGreen, the LA Green Building Code and LEED Green Building Rating System standards to reduce energy and water use, reduce waste, and reduce the carbon footprint.

Specific measures to be incorporated into the Proposed Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Use of energy efficient lighting;
- Use of Energy Star appliances for office equipment;
- Use of high energy efficiency rooftop heating and conditioning systems;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to sewer systems.

C. Project Construction and Operation Impacts

The Proposed Project would generate greenhouse gas emissions, but would not exceed the draft thresholds of significance being considered by the SCAQMD. The impact of the Proposed Project would therefore be less than significant.

Impact Analysis

The evaluation of GHG impacts associated with the Proposed Project is based upon the SCAQMD's draft tiered thresholds of significance

Tier 1

The Proposed Project is subject to CEQA, but no categorical exemptions are applicable to the Project. Therefore, the analysis moves to Tier 2.

Tier 2

The Proposed Project would be required to comply with the Green Building Program Ordinance, which would reduce the GHG emissions that would be associated with operation of the proposed new building. However, neither the SCAQMD nor the City of Los Angeles have adopted a GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. Therefore, the analysis moves to Tier 3.

Tier 3

The estimated annual construction-related and operational GHG emissions associated with the Proposed Project have been calculated utilizing the California Emissions Estimator Model (CalEEMod v.2011.1.1) recommended by the SCAQMD. These emissions are shown in Table IV.E-2. As shown, the annual emissions would exceed the draft 3,000 MTCO₂E threshold for non-industrial projects. Therefore, the analysis moves to Tier 4.

**Table IV.E-2
Estimated Project GHG Emissions**

Emissions Source	CO₂E in Metric Tons per Year
Construction ^a	48.58
Operation	
Area Sources	0.00
Energy Sources	1,994.45
Mobile Sources	1,668.93
Waste Disposal	47.97
Water & Wastewater	64.95
Total Emissions	3,824.88
SCAQMD Draft Tier 3 Threshold	3,000.00
Exceeds Threshold?	Yes
<i>a - Construction emissions are amortized over 30 years in accordance with SCAQMD guidance (1,457.51 MTCO₂E/30 years). Calculation result sheets are provided in Appendix A of the GHG Report. Source: Cadence Environmental Consultants, June 2013.</i>	

Tier 4

The SCAQMD's draft thresholds define the service population as the total residents and employees associated with a project. This may be appropriate for regional or community-wide analyses in which most people are either residents or employees and the two cross over (residents of the community are also employees in the community). In the case of general development projects, the service population consists of residents, employees, customers, vendors, students, etc. In the case of an office project, employees may be only half of the number of people that visit a site. A substantial portion of people visiting an office project may be customers, with a smaller number of vendors (delivery and sales). However, such numbers may vary considerably depending upon the type of business, so in order to perform a conservative analysis and maintain consistency with SCAQMD, this analysis only considers the employees of the proposed new building as the service population for the Proposed Project.

The Proposed Project is expected to generate approximately 888 jobs based upon a generation rate of 3.4965 employees per 1,000 square feet of office use.¹³ Dividing the 3,851.68 MTCO₂E annual GHG emissions by 888 employees yields an efficiency of 4.34 MTCO₂E of GHGs per employee. However, the analysis demonstrates that the GHG emissions per employee would be less than the SCAQMD's draft threshold of 4.8 MTCO₂E per service population. Therefore the City of Los Angeles, as lead agency, may conclude that the GHG emissions generated in association with the Proposed Project would not have a significant impact on the environment.

¹³ *Los Angeles Unified School District, 2002.*

D. Consistency with GHG Plans

The Proposed Project would generate greenhouse gas emissions, but would be consistent with applicable plans to reduce greenhouse gas emissions in California. The impact of the Proposed Project would be less than significant.

Impact Analysis

As discussed previously, the 2006 CAT Report and the ARB's Scoping Plan were developed to direct the State to reduce GHG emissions to 1990 levels. The strategies from the 2006 CAT Report and measures from the ARB's Scoping Plan are applicable to State, regional, and local agencies in the development of plans to reduce GHG emissions, but are not applicable to each and every new general development project. However, strategies and measures have been implemented on the State level by example of the new Title 24 CALGreen Code and on the local level by the City of Los Angeles Green Code.

As discussed previously, the SCAQMD's Tier 4 draft 4.8 MTCO₂E per service population efficiency target was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. As shown in the previous analysis, the Proposed Project would have an efficiency of 4.34 MTCO₂E of GHGs per employee. Therefore, the Proposed Project would be consistent with the goals of AB 32. The Proposed Project would also be subject to the energy efficiency requirements of the new 2013 Title 24 CALGreen Code and the City of Los Angeles Green Building Code. Based on this information, the Proposed Project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. The impact of the Proposed Project would be less than significant.

4. CUMULATIVE IMPACTS

As discussed above, emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change; the consequences of which may result in adverse environmental effects. The State has mandated a goal of reducing State-wide emissions to 1990 levels by 2020, even though State-wide population and commerce is expected to grow substantially. As discussed above, the 4.34 MTCO₂E of GHGs per employee would be less than the SCAQMD's draft threshold of 4.8 MTCO₂E per service population. This efficiency target was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. For these reasons, the contribution of the project to the cumulative effect of global climate change is not considered to be cumulatively considerable.

5. MITIGATION MEASURES

No mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required as impacts associated with greenhouse gas emissions from the Proposed Project would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

F. ENVIRONMENTAL HAZARDS & HAZARDOUS MATERIALS

1. INTRODUCTION

This section evaluates potential impacts related to hazards and hazardous materials associated with development of the Proposed Project. It discusses whether the Proposed Project would create a significant hazard to the public or the environment due to its proximity to hazardous conditions and/or hazardous materials. This analysis is based on the information provided in the Environmental Site Assessment Phase I and Methane Soil Testing, Proposed Office Development Project, Commercial Property, Portion of APN 5508-015-007, 5711 Wilshire Boulevard,¹ Los Angeles, CA 90036, by California Environmental Geologists and Engineers, dated January 2013 (Phase I ESA).

The Phase I ESA was conducted in general conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Standard Practice E1527-05² and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).³ The analysis consisted of: (1) review of historical site use; (2) review of aerial photographs; (3) review of Sanborn Fire Insurance maps; (4) review of City directories; (5) regulatory agency records review; (6) regulatory data base records review; (7) interviews with owner, past owners and others; and (8) site inspection.

The Phase I ESA, including all relevant maps, photos, questionnaires, agency inquiry and response letters and laboratory test reports, is incorporated herein by this reference, are provided in Appendix IV.F to this Draft EIR.

2. ENVIRONMENTAL SETTING

A. Definitions

This Draft EIR uses the definition given in Section 25501(o) of the California Health and Safety Code, which defines a 'hazardous material' as:

Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous

¹ Note: as previously discussed in Section II., Project Description, per the City of Los Angeles Department of Planning, Zone Information and Map Access System (ZIMAS), the Project Site includes all of the following addresses: 5779 Wilshire Boulevard, 5775 Wilshire Boulevard, 5761 Wilshire Boulevard, 5757 Wilshire Boulevard, 5759 Wilshire Boulevard, 5765 Wilshire Boulevard, 5771 Wilshire Boulevard, 5767 Wilshire Boulevard, 5773 Wilshire Boulevard, 5769 Wilshire Boulevard, and 5711 Wilshire Boulevard. Website: <http://zimas.lacity.org/>, accessed November 28, 2012.

² ASTM E1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. Website: <http://www.astm.org/Standards/E1527.htm>, accessed June 19, 2013.

³ Code of Federal Regulations Title 40: Protection of Environment. Website: http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr312_main_02.tpl, accessed June 19, 2013.

Materials” include, but are not limited to, hazardous substances, hazardous wastes, and any materials which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

“Hazardous waste” is any hazardous material that is abandoned, discarded or recycled, as defined by Sections 25117 and 25124 of the California Health and Safety Code. In addition, hazardous waste may occasionally be generated by actions that change the composition of previously nonhazardous materials. The criteria used to characterize a material as hazardous include ignitability, toxicity, corrosivity, reactivity, radioactivity or bioactivity.

B. Existing Uses & Project Description

The total Museum Square site is approximately 7-1/2 acres (327,613 square feet); it is fully developed with a commercial office complex, an associated structure parking and a parking surface lot. The Proposed Project Site is the approximately 135,831 square feet (sf) northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot (refer to Figure II-3, Parcel Survey Map). The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building (refer to Figure II-4, Proposed New Parcel Map). Following the lot split, the existing surface parking lot would be demolished, allowing for the construction of a new 13-story, approximately 249,500 sf commercial office building and the addition of two new levels of parking (approximately 162,768 sf) to the existing five-level parking structure. No structures are located on the portion of the Project Site proposed for development of the new office building.

C. Surrounding Uses

The Project Site is located on a heavily trafficked segment of Wilshire Boulevard in the Miracle Mile area of the City west of downtown Los Angeles and Mid-City. The land uses within the general vicinity of the Project Site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction. The Project Site is generally bound by commercial development to the south, east, and west. Multi-family residential developments are located to the north and east. Museum and park uses (Hancock Park) are located west of the Project Site, across Curson Avenue.

i) Sensitive Receptors

Land uses that are considered more sensitive to environmental discharges than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to environmental discharges because the very young, the elderly, and the infirm are more susceptible due to their fragile immune systems and special sensitivity to environmental discharges than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods.

Surrounding uses that would be considered sensitive receptors with respect to hazardous material exposure include the multi-family residential uses located to the north and east. The closest schools to the Project Site are Cathedral Chapel School (755 S. Cochran Avenue) located approximately one-half

mile southeast of the Project Site, and Hancock Park Elementary School (408 S. Fairfax Avenue) located approximately one-half mile northwest of the Project Site.

D. Historic Use of the Project Site

i) Summary of Site History

Based on review of historical documentation and regulatory agency records, the Museum Square site was developed with an 11-story commercial office building and an affiliated surface parking lot in 1948 for use by the Prudential Insurance Company. A review of historical City of Los Angeles directories indicate that various other tenants of the office building complex have included administrative/office, medical, banking, concierge, conferencing facility, convenience store, dry cleaning and restaurant uses.

ii) Historical Maps and Aerial Photographs

Sanborn Fire Insurance maps provide historical land use information in some metropolitan areas. Sanborn maps were reviewed for the Museum Square site for the years 1927, 1950, and 1969. Historical aerial photographs were also reviewed for the years 1947, 1956, 1965, 1976, 1989, 1994 and 2005. Historical site utilization research indicates that the portion of Proposed Project Site to be developed with the office building component was undeveloped until a surface parking lot was constructed during the early 1950s. This portion of the Project Site remains utilized as an at-grade parking facility. The southern portion of the Museum Square site was developed with an 11-story office tower for the western headquarters of the Prudential Insurance Company in 1947. The existing five-story parking structure on the Project Site was approved and constructed in 1983.

E. Interviews

An Environmental Field Interview Questionnaire was completed on November 26, 2012 by key site manager Richard Corey. With the exception of the Project's location in a Methane Zone, no potential environmental concerns were identified based on the interview responses.

F. Project Site Reconnaissance

Site reconnaissance was conducted on November 21, 2012 by an individual meeting the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312⁴ and who has the specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20.⁵ During the site reconnaissance, the following general observations were made:

- The Project Site consists of a rectangular-shaped parcel of land that encompasses approximately 135,831 square feet. The Project Site is currently developed as an at-grade parking facility and a five-story parking structure.

⁴ *Code of Federal Regulations Title 40: Protection of Environment. Website: http://www.ecfr.gov/cgi-bin/text-id?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr312_main_02.tpl, accessed June 12, 2013.*

⁵ *A full statement of qualifications and license numbers are provided in the Phase I ESA, Appendix IV.F of this Draft EIR.*

- The area surrounding the Project Site consists of commercial, residential, park and museum and uses.
- The Project Site is nearly level. Drainage from the site is by sheet flow towards the adjacent city streets.
- No evidence of sumps or standing water was observed on the Project Site.
- No evidence of the past use, treatment, storage, disposal or generation of hazardous substances was observed on the Project Site.
- No evidence of hazardous substance use was observed on the Project Site.
- No evidence of existing aboveground or underground storage tanks, clarifiers, sumps, or grease interceptors was observed on the Project Site.
- No evidence of containers of hazardous or unidentified substances was observed on the Project Site.
- No evidence of onsite disposal or landfill of solid waste material was observed on the Project Site.
- No evidence of PCB containing transformers or equipment was observed on the Project Site.
- Heating and cooling equipment was not observed at the time of the site reconnaissance.
- No evidence of wastewater treatment or disposal systems was observed on the Project Site.
- No evidence of dry wells, irrigation wells, injection wells, abandoned wells, monitoring wells or other wells was observed on the Project Site.
- No evidence of strong, pungent or noxious odors was noted on the Project Site.
- No evidence of stressed vegetation was observed on the Project Site.
- No evidence of staining or residue was observed on the Project Site.
- No evidence of pits, ponds, and/or lagoons was observed on the Project Site.
- No other conditions of environmental concern regarding potential sources for soil and groundwater contamination were observed on the Project Site.
- Elevated concentrations of methane were detected in soil-gas beneath the Project Site.
- Natural petroleum hydrocarbons were found in shallow soil beneath the Project Site.

G. Environmental Risks

i) Historic Uses

The review of historical site use identified that the Museum Square site has been used for commercial purposes since 1950. No evidence of the past use, treatment, storage, disposal or generation of hazardous substances was identified in association with the current or historical use of the property.

ii) Asbestos-Containing Materials

Building materials containing asbestos (ACMs) were commonly used in structures between 1945 and 1980. These materials include vinyl flooring and mastic, wallboard and associated joint compound,

plaster, stucco, acoustic ceiling spray, ceiling tiles, heating systems components, and roofing materials. Airborne particles of asbestos have been found to be hazardous to human health. The Occupational Safety and Health Administration (OSHA) defines ACMs as those materials that contain more than one percent asbestos.

The Proposed Project Site contains a surface parking lot and a five-story parking structure built in 1983. The structure is built of steel-reinforced concrete with metal railings used throughout the stairwells. Given the date of construction and the type of materials used, no building components containing suspect ACMs would be likely at the Project Site. In 2011, approximately 1.2 tons of ACMs were identified and removed from the neighboring Museum Square Office Tower building and disposed of at a landfill pursuant to local, State and federal regulations.

iii) Lead-Based Paint

Lead-based paint (LBP) is considered a health hazard for people, especially children. From the turn of the century through the 1940's paint manufacturers used lead as a primary ingredient in many oil-based paints. Use of lead in paint decreased but was still used until 1978, when it was banned from residential use. California law requires that all residential buildings constructed on or before January 1, 1979 or schools constructed on or before January 1993 to be presumed to contain lead-based paint. Structures (residential, commercial, or industrial) are affected by lead based paint regulations if remodeling, renovations, or demolition activities would disturb lead-based paint surfaces.

The Proposed Project Site contains a surface parking lot and a five-story parking structure built in 1983. The structure is built of steel-reinforced concrete with metal railings used throughout the stairwells. Given the date of construction and the type of materials used, no building components containing suspect LBP would be likely at the Project Site.

iv) Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are mixtures of chlorinated compounds, which can exist as vapor, oily liquids, or solids. PCBs have been used as coolants and lubricants in transformers and other electrical equipment because they do not burn easily and are good insulators. When PCBs leak into the air, water, and soil they can result in skin rashes and liver damage in humans. PCBs are also probable human carcinogens. In 1977, the U.S. government banned the production of PCBs.

Older light ballasts associated with fluorescent light fixtures were typically manufactured with fluids containing PCBs. Newer light ballasts (post 1969) were typically manufactured free of PCBs and will generally be labeled "No PCBs." Based on the construction date of the existing parking structure (approximately 1983), the presence of PCBs is unlikely. No evidence of PCB containing transformers or equipment was observed on the Project Site at the time of the site reconnaissance. Therefore, no PCBs are anticipated to be encountered on site.

v) Underground Storage Tanks (USTs) and Aboveground Storage Tanks (ASTs)

The Museum Square site was formerly listed on the Leaking Underground Storage Tank (LUST) database for a leaking underground storage tank. The Los Angeles Regional Water Quality Control Board (RWQCB) was the lead agency responsible for monitoring and oversight. The RWQCB issued case closure in 1996. No USTs or ASTs are located within the Proposed Project Site.

vi) Landfills / Solid Waste

The Major Waste System maps for Los Angeles County, the Solid Waste Information Systems (SWIS), and the Waste Management Unit Database (WMUD) were reviewed to identify landfills and transfer stations located near the Museum Square site. Map no. 114-157 and the EDR database report indicate no landfills or transfer stations located within a 2,000-foot radius of the Project Site. No active hazardous waste landfills are located within Los Angeles County.

Trash bins are located within an enclosure located at the northwest corner of the Project Site. No evidence of spills and/or staining was observed on the pavement beneath the bins. No evidence of onsite disposal or landfill of solid waste material was observed on the Project Site at the time of the site reconnaissance.

vii) Methane

Methane (CH₄) is a naturally occurring, odorless, colorless, and extremely flammable gas with a wide distribution in nature. It is the major constituent of natural gas that is used as a fuel, and is an important source of hydrogen and a wide variety of other organic compounds. It is often found in conjunction with petroleum deposits. No long-term health effects are known to occur from exposure to methane. However, at very high concentration, methane can act as an asphyxiate by reducing the relative concentration of oxygen in the air that is inhaled (similar to carbon monoxide). The primary danger posed by methane build-up is the risk of fire or explosion.

The Project Site is adjacent to the east of the world-renowned La Brea Fossil Tar Pits. Numerous mammalian and bird fossils associated with the Pleistocene Epoch were preserved within the natural asphaltum (a black, oily, viscous material that is a naturally-occurring organic byproduct of decomposed organic materials) deposits that reach the ground surface in the area. Natural asphaltum is widespread in the shallow sediment beneath the region.

Methane in the atmosphere has both natural and anthropogenic (i.e., caused by humans) sources. Its atmospheric concentration is less than carbon dioxide (CO₂) and its lifetime in the atmosphere is brief (10-12 years) when compared to other gases. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning. (For further discussion regarding potential impacts on global warming from methane, refer to section IV.E. Greenhouse Gas Emissions of this Draft EIR.)

Methane has the potential to migrate into buildings through physical pathways that include cracks in concrete foundations, unsealed conduits or utility trenches, and other small openings common in building construction. Methane gas can also reach the surface through natural geologic features which may facilitate vertical, lateral or oblique migrations.

Worker exposure to methane is regulated by the federal Occupational Safety and Health Administration (OSHA) under CFR section 1910.146. This section regulates worker exposure to a 'hazardous atmosphere' within a confined space where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit.

Chapter IX, Article 1, Division 71, Section 91.7103 of the Los Angeles Municipal Code (LAMC), also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. The Project Site is located within a Methane Hazard Zone, as designated by Los Angeles

Department of Building and Safety (LADBS).⁶ Due to the potential environmental risk associated with Methane Hazard Zones, properties within a Methane Hazard Zone require methane testing and mitigation upon (re)development.

In compliance with Division 71, testing for methane gas was undertaken at the Project Site on November 21, 2012. Three nested 5-10 foot deep soil gas probes were placed by H & P Mobile Geochemistry (LADBS Certified Methane Test License #10231) under the direction of California Environmental Geologists & Engineers near the northern, central and southern portions of the surface parking lot on the Project Site. A hydraulic push drill rig was utilized for the placement of the probes to depths of five and ten feet below the ground surface (bgs). Perched, shallow groundwater (5-7 feet bgs) was identified during placement of the probes.

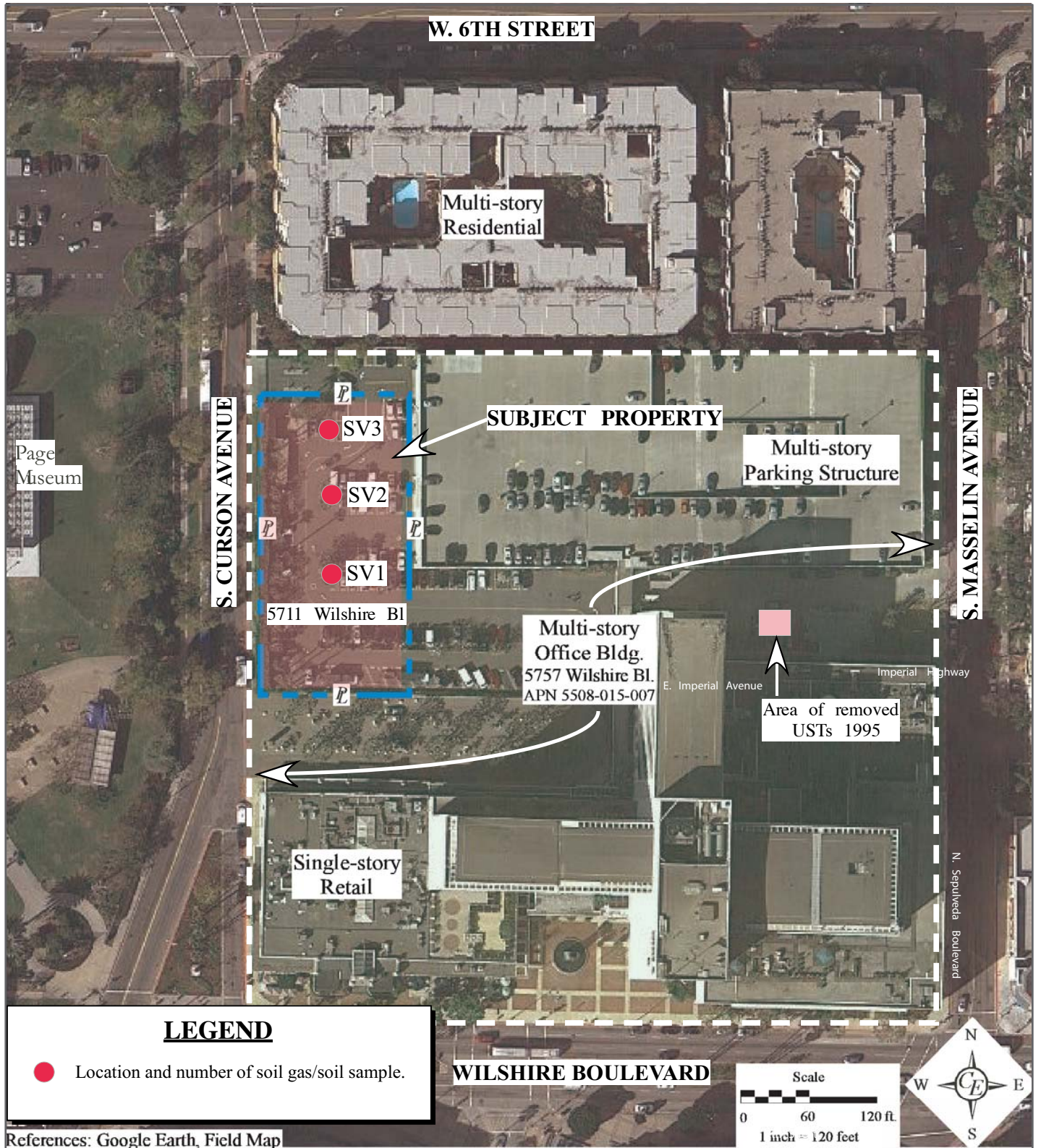
The soil gas probes consisted of a sampling tip attached to inert nylon tubing. Each segment was premeasured to ensure the correct depth. The sample point was set within a one foot sand sensing zone at five and fifteen feet bgs. Dry granular bentonite (a fine grained clay) was placed above the sand sensing zone and hydrated to seal the sensing zone. The probe was completed to the surface with the hydrated bentonite and capped with a gas-tight two-way valve preventing degassing of the vapor point. The soil gas probes were allowed to equilibrate prior to the collection of the soil-gas sample. A three-purge volume was utilized for the soil gas sampling.

Samples of soil gas were tested for the presence of methane and fixed gases (oxygen (O₂) and CO₂) using a Landtec GEM 2000 field analyzer. Atmospheric pressure and relative pressure in the probes were measured using a magnehelic pressure gauge. The gas probe pressures were measured at 0.0-inches of water in all locations. The locations of the three soil gas probes (SV1, SV2 and SV3) are shown on Figure IV.F-1. The three probes were sampled on November 21 and 26, 2012.

Methane was recorded at concentrations of 8,000 to 402,000 parts per million by volume (ppmv) in all probes and at all depths of 4.5 to 5 feet. The deep (10 foot) probe showed evidence of moisture intrusion during the initial sampling event (vapor could not be extracted). Perched groundwater was encountered in probe SV3 at a depth of 5.5 feet during the soil sampling activities.

Six soil samples were obtained from depths of 5, 10 and 20 feet from the soil gas probe pilot holes. The soil samples were tested for petroleum hydrocarbons (gasoline through oil range) using gas chromatography flame ionization detector (GC/FID) methods. Petroleum was detected in four of the six soil samples. The concentration of petroleum hydrocarbons ranged from 660 mg/kg in sample SV2 at 10 feet to 45,000 mg/kg in SV1 at 20 feet. The petroleum hydrocarbons are related to the natural asphaltum-oil seepage common to the region. Layers of oil-type hydrocarbons were observed in the sediment samples. The Methane Test Data summary and lab reports (soil-gas and soil) are provided in the Phase I ESA, Appendix VI.

⁶ *City of Los Angeles Department of Planning, Zone Information and Map Access System, 5701 W. Wilshire Blvd (et al). Website: <http://zimas.lacity.org/>, accessed November 28, 2012.*



Source: California Environmental, January 2013.

Further information regarding methane hazards and testing in the Project vicinity can be found in the EIR/EIS for the Westside Subway Extension (the Purple Line) prepared jointly by the U.S. Department of Transportation - Federal Transit Administration and the Los Angeles County Metropolitan Transportation Authority (Metro). All reports prepared for the purpose of CEQA disclosure, including all technical appendices, are available online at the following link:

<http://www.metro.net/projects/westside/westside-reports/>

In summary, an elevated concentration of methane gas (8,000 to 402,000 ppmv) was detected beneath the Project Site during the soil-gas testing, a condition associated with a regional oil field and the local natural asphaltum-oil seepage.

viii) Oil Wells

The State of California Division of Oil, Gas and Geothermal Resources (DOGGR) Map No. 118 indicates that the Project Site is located within the boundaries of the Salt Lake Oil Field. Most of the wells within the Salt Lake Oil Field have been abandoned. There are no active or abandoned wells on or nearby the Project Site. The nearest well to the Project Site is the abandoned well, Chevron "Salt Lake 406" located on a property approximately 400 feet to the northeast. Numerous abandoned oil wells are located beneath the Park La Brea development, north of the Project Site in the vicinity of 6th Street.

ix) Radon

According to the U.S. Environmental Protection Agency (EPA), the Project Site, being located in Los Angeles County, is situated within Radon Zone 2, with a predicted average indoor radon screening level between 2 and 4 picoCuries per Liter (pCi/L, moderate potential). Based on the January 2005 Radon Potential Zone Map for Southern Los Angeles County, published by the California Department of Health Services (DHS), the Project Site is located in an area of low potential (six percent) for indoor radon levels above the 4.0 pCi/L action level.

H. Regulatory Framework

i) Federal Regulations

A variety of laws and regulations governing the management and control of hazardous substances has been established at the federal level to protect the environment. These regulations fall under the jurisdiction of the United States Environmental Protection Agency (US EPA) and include the following principal laws:

- The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or "Superfund," creates national policy and procedures to identify and cleanup sites where hazardous substances have been released into the environment and provides the mechanisms by which these remedial actions are financed. Additionally, the Superfund Amendment and Reauthorization Act (SARA), which extended and amended CERCLA, required that due diligence be exercised in the investigation of past and current handling of hazardous substances prior to property sale.
- The Resource Conservation and Recovery Act (RCRA) was enacted in 1974 as the first step in regulating the potential health and environmental problems associated with solid hazardous and non-hazardous waste disposal.

- The Toxic Substances Control Act (TSCA), enacted in 1976, regulates and controls harmful chemicals and toxic substances in commercial use, in particular PCBs.
- The Federal Insecticide, Fungicide, and Rodenticide Act (as amended) controls the manufacture, use, and disposal of pesticides and herbicides.
- The Hazardous and Solid Waste Act (HSWA) includes the 1984 amendments to RCRA to address gaps in the area of highly toxic wastes.
- Title 29 Code of Federal Regulations (CFR), Part 1910 contains the Occupational Safety and Health Administration (OSHA) requirements for workers at hazardous waste sites including emergency response, hazard communication, and personal protective equipment.

ii) State Regulations

At the State level, California has developed hazardous waste regulations that are similar to the federal laws, but that are much more stringent in their application. The basic law established in California, similar to RCRA, is the Hazardous Waste Control Law (HWCL). More detailed information concerning the implementation of these requirements is given in Title 22 of California Code of Regulations (CCR), Chapter 230. The HWCL empowers the Department of Toxic Substances Control (DTSC), a division of CAL EPA (formerly part of the Department of Health Services), to administer the State's hazardous waste program and implement the federal program in California. This law includes UST regulation.

Other relevant State laws include the following:

- Proposition 65 focuses on carcinogenic or teratogenic contaminants and implements the State's community-right-to-know program.
- UST Law that regulates underground storage to prevent groundwater contamination.
- Porter-Cologne Water Quality Control Act, adopted in 1969, requires the maintenance of the highest reasonable quality of the State's waters. It authorizes the Regional Water Quality Control Board (RWQCB) to supervise cleanup efforts at spill sites that have affected groundwater.

The DTSC has the primary responsibility for enforcement and implementation of hazardous waste control laws in the State. However, this responsibility is shared with other State and local government agencies, including the State Water Resources Control Board (SWRCB), RWQCB, and City and County governments.

iii) Local Regulations

At the local level, the Los Angeles Fire Department (LAFD) administers hazardous materials environmental compliance programs within City jurisdiction. These programs include hazardous materials disclosure and business plans, underground storage tank programs, aboveground storage tank spill prevention control and countermeasures, hazardous waste generator programs (administered by Los Angeles County Fire Department), and the California Accidental Release Prevention Program.

In addition, the City of Los Angeles adopted Ordinance No. 175,790 in March of 2004. The Ordinance includes information describing the test protocols, design parameters, and installation procedures for the methane gas mitigation systems; and requires mitigation for methane gas intrusion into buildings located within a Methane Zone or Methane Buffer Zone as established under Sections 91.7101 et seq. of

the Los Angeles Municipal Code. The LADBS is responsible for administering compliance with methane mitigation systems.

iv) Regulatory Agency Search

A review of the most current databases and files from federal and state environmental regulatory agencies as well as local entities was conducted to identify use, generation, storage, treatment, or disposal of hazardous materials and chemicals, or release incidents of such materials, which may impact the Project Site.

v) Federal, State and Historic Lists

Federal Lists

The following federal environmental databases were reviewed to obtain information pertaining to the Project site and properties within the listed approximate search distance. These databases are maintained by the US EPA.

- US EPA National Priority List (NPL)
- US EPA Comprehensive Environmental Response, Compensation, and Liability Information System Database (CERCLIS)
- US EPA Resource Conservation and Recovery Act (RCRA) Large and Small-Quantity Generator lists and Permitted Treatment Storage and Disposal Facilities lists (RCRIS- LQG/SQG/TSD)
- Emergency Response Notification System (ERNS)
- Hazardous Materials Information Reporting System (HMIRS)
- Superfund (CERCLA) Consent Decrees (CONSENT)
- Department of Defense Sites (DOD)
- US EPA BROWNFIELDS
- Toxic Chemical Release Inventory System (TRIS)
- FIFRA/TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

State, Local and Historic Lists

The following State, local and historic environmental databases were reviewed to obtain information pertaining to the Project Site and properties within the listed minimum search distance of the Project Site.

- State Registered Underground Storage Tanks (UST);
- State and County Leaking Underground Storage Tanks List (LUST);
- Historic Underground Storage Tank Database (HIST UST)
- Sites with active and inactive USTs (CA FID UST)
- State, Regional and County Solid Waste Landfills, Incinerators, or Transfer Stations List (SWIS)
- Contaminated Water Wells Database (Cortese List)
- California Hazardous Waste Tracking System (Facility Index System Database -FINDS)
- Hazardous Waste Manifests Database (HAZNET)

- Statewide Environmental Evaluation and Planning System (SWEEPS)
- Solid Waste Recycling Facilities list (SWRCY)
- Spills, Leaks, Investigations, and Cleanups Section Database (CA-SLIC)
- Toxic Pits Cleanup Act
- LA County Site Mitigation
- Voluntary Cleanup Program Properties (VCP)
- Dry Cleaner Facilities
- Historical Auto Stations

These Agency database lists were reviewed for known or suspected contaminated sites and for sites that store, generate or use hazardous materials near the Museum Square site. The Museum Square site is listed on the LUST, EMI, CA FID UST, HAZNET and Cortese databases. Primary issues identified were removal of asbestos containing wastes and a leaky underground storage tank. The Museum Square site was reported on EMI (1987) and HAZNET lists (2011). As previously discussed, in 2011, approximately 1.2 tons of asbestos containing wastes were removed from the neighboring Museum Square Office Tower building and disposed of at a landfill. The Museum Square site was also listed on the LUST database for a leaky underground storage tank. The RWQCB was the lead agency responsible for monitoring and oversight. The RWQCB issued case closure in 1996.

Six environmental sites, listed on the LUST, Cortese, LOS ANGELES CO. HMS, SLIC, WIP, SWRCY, RCRA-SQG, FINDS, Historical Cleaners, HAZNET, EMI, UST, CA FID UST, SWEEPS UST, HIST UST, CA WDS and ERNS databases, are located nearby the Project Site. A listed environmental concern site is the George C. Page Museum (La Brea Tar Pits), located approximately 200 feet to the west. Another listed contaminated site near to the Project Site is California Federal Plaza Service Station, located approximately 200 feet to the south. A case was opened by the RWQCB in 1993 for a leaky underground storage tank located there. No specific contaminants of concern were reported. The RWQCB was the lead agency responsible for oversight and issued case closure in 1998. It is considered unlikely that the soil or groundwater beneath the Project Site is impacted by the releases identified on the government environmental databases, as these sites are located cross or down gradient of the Project Site. Selected environmental risk sites found to exist nearby the Project Site are listed in Table IV.F-1. The EDR Radius Map with GeoCheck is provided in the Phase I ESA in Appendix V.

Table IV.F-1
Locally Listed Environmental Sites of Concern near the Proposed Project Site

Name	Address	Distance from Project Site	Environmental Record Source
George C. Page Museum	5801 Wilshire Blvd	200 feet west	RCRA-SQG, FINDS
LaSalle Partners Asset Mgmt JH Snyder Company Cal Fed Savings	5750 Wilshire Blvd	200 feet south	UST, SWEEPS UST, CA FID UST, HAZNET
Beneficial Standard Life Ins Co	5700 Wilshire Blvd	200 feet south	RCRA-SQG, FINDS
California Federal Plaza Service Station 7152 Pacific Parking Corp Service Station 7152	5670 Wilshire Blvd	200 feet south	HIST UST, RCRA-SQG, FINDS, CA FID UST, SWEEPS UST, HAZNET
Green Jos	5666 Wilshire Blvd	200 feet south	EDR Historical Cleaners
Prepress Studio	5657 Wilshire Blvd	200 feet south	RCRA-NonGen, FINDS
<i>Source: California Environmental Geologists and Engineers, January 2013.</i>			

vi) Other Agencies

Other environmental record sources were also reviewed from the state Department of Toxic Substances Control (DTSC), the RWQCB, the South Coast Air Quality Management District (SCAQMD), Los Angeles County Health Department (LACHD), the County Sanitation Districts of Los Angeles County (Major Waste System maps for Los Angeles County, the Solid Waste Information Systems (SWIS), and the Waste Management Unit Database (WMUD)) the City of Los Angeles Department of Building and Safety (LADBS), and the LAFD.

Records reviewed and/or response letters received from the DTSC, the RWQCB, the SCAQMD, SWIS, WMUD, the LACHD, and the LADBS indicated that there were no records maintained showing any potential environmental concerns were identified for the Museum Square site address(es).

However, according to a representative of the City of Los Angeles Fire Department (LAFD), while there are no underground storage tank records or industrial waste files maintained for the portion of the Museum Square site to be redeveloped following the lot split (i.e. the Project Site), the LAFD does maintain a file for the property address at 5757 Wilshire Boulevard (the existing Museum Square building complex). The file contains permits for installation of two 5,000-gallon fuel oil USTs in 1948. A 1956 permit indicates the USTs were relocated. In 1995 the two 5,000-gallon USTs were abandoned by removal. The tanks were located in the service dock, north of the 5757 building, between the building and the existing parking structure, approximately 300 feet east of the site for the Proposed Project office building. The file contained the tank closure soil sample data that showed up to 24,000 mg/kg of TPH-diesel was detected in one soil sample obtained from the tank excavation. The LAFD required an assessment be conducted to determine the extent of the release. The following report was prepared at the request of the LAFD: Site Assessment Report, Museum Square, 5757 Wilshire Blvd. LA, CA 90036, Advanced Environmental Concepts, dated February 1996.

The report provides subsurface assessment data (soil and groundwater) obtained in the area of two removed 5,000-gallon diesel USTs. Four borings were drilled to a depth of 15 feet. TPH-diesel was not detected in the eight soil samples analyzed. TPH-oil was found in one sample at a concentration of 240

mg/kg. Volatile organic compounds (VOCs) found in petroleum derivatives such as gasoline, were not detected in the soil samples. TPH-diesel and VOCs were not detected in the groundwater sample. The subsurface testing confirmed that the hydrocarbon release detected during the tank removal was limited to the area immediately adjacent to the tank excavation. The report recommended that final closure for the tank removal work be granted by the LAFD. The LAFD referred the case to the RWQCB. The RWQCB issued final UST case closure for the release on the Project Site on May 21, 1996. The LAFD file data is included in the Phase I ESA as Appendix IV.

Notwithstanding the aforementioned items, in all other cases no violations were reported and/or no deleterious records were found indicating hazardous substances and materials located on or nearby the Project Site.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Proposed Project could have a potentially significant impact if it were to:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste 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 create a significant hazard to the public or the environment;
- 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, result in a safety hazard for people residing or working in the project area;
- f) For a project located within the vicinity of a private airport strip, result in a safety hazard for people residing or working in the project area;
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- 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.

City of Los Angeles CEQA Thresholds Guidelines

As set forth in the *L.A. CEQA Thresholds Guide 2006*, the determination shall be made on a case-by-case basis, considering the following factors:

- a) The regulatory framework;
- b) The probable frequency and severity of consequences to people or property as a result of a potential accidental release of explosion of a hazardous substance;
- c) The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences;
- d) The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;
- e) The regulatory framework for the health hazard;
- f) The probable frequency and severity of consequences to people from exposure to the health hazard; or
- g) The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

B. Project Impacts***i) Routine Transport, Use, or Disposal of Hazardous Materials***

Construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of commercial development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. Furthermore, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard best management practices (BMPs) set forth by the City and the RWQCB which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the Proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. Impacts would be less than significant.

The Proposed Project consists of the development of commercial uses and adding two levels of parking to an existing parking structure. The types of potentially hazardous materials associated with operation of the Proposed Project include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials include but are not limited to lacquer thinner, chemicals for weed control, and glass cleaners. However, all potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. With compliance with existing local, State, and federal regulations, the transport, storage and sale of these materials would not pose a significant hazard to the public or the environment. Therefore, Project impacts related to this issue would be less than significant.

ii) Historic Uses

As previously discussed, the review of historical site use identified that the Project Site has been used for commercial purposes since 1950. No evidence of the past use, treatment, storage, disposal or generation of hazardous substances were identified in association with the current or historical use of the property. Therefore there would be no impacts associated with this issue.

iii) Asbestos-Containing Materials

As previously discussed, the Proposed Project Site contains a surface parking lot and a five-story parking structure built in 1983. The structure is built of steel-reinforced concrete with metal railings used throughout the stairwells. Given the date of construction and the type of materials used, no building components containing suspect ACMs would be likely at the Project Site.

A limited number of ACMs may still be sold in the U.S., including, but not limited to asphaltic and bituminous roofing materials and pipeline coatings. However, the use and installation of these materials is strictly controlled by both federal (EPA and OSHA) and State (Cal-OSHA) regulations, ensuring their safe installation and use. Therefore, impacts associated with an exposure to ACMs during construction and operation of the Proposed Project would be less than significant.

iv) Lead-Based Paint

As previously discussed, the Proposed Project Site contains a surface parking lot and a five-story parking structure built in 1983. The structure is built of steel-reinforced concrete with metal railings used throughout the stairwells. Given the date of construction and the type of materials used, no building components containing suspect LBP were identified during the site inspection. Further, the use of LBP was discontinued in 1979. Therefore, there would be no impacts associated with an exposure to LBP during construction and operation of the Proposed Project.

v) Polychlorinated Biphenyls

As previously discussed, the Proposed Project Site contains a surface parking lot and a five-story parking structure built in 1983. No evidence of PCB containing transformers or equipment was observed on the Project Site at the time of the site reconnaissance. Therefore, no PCBs are anticipated to be encountered on site. Further, the use of PCBs was banned in 1977. Therefore, there would be no impacts associated with an exposure to PCBs during construction and operation of the Proposed Project.

vi) Underground Storage Tanks (USTs) and Aboveground Storage Tanks (ASTs)

As previously discussed, the only above-ground or underground storage tanks identified on or in the vicinity of the Project Site were the two USTs that were formerly located on the Museum Square site immediately south of the portion of the Project Site. These USTs have been removed, and the case has been closed by the RWQCB. No USTs or ASTs are located within the Proposed Project Site. Therefore, there would be no impacts associated with the risk of upset from leaking USTs or ASTs during construction and operation of the Proposed Project.

vii) Landfills / Solid Waste

As previously discussed, no landfills or transfer stations are located within a 2,000-foot radius of the Project Site. No active hazardous waste landfills are located within Los Angeles County.

Trash bins are located within an enclosure located at the northwest corner of the Project Site. No evidence of spills and/or staining was observed on the pavement beneath the bins. No evidence of onsite disposal or landfill of solid waste material was observed on the Project Site at the time of the site reconnaissance. Further all federal, state and local regulations governing the storage and disposal of solid waste will be enforced during Proposed Project construction and operation. Therefore, there would be no impacts associated with the risk of upset regarding solid waste during construction and operation of the Proposed Project.

viii) Methane

As previously discussed, Chapter IX, Article 1, Division 71, Section 91.7103 of the LAMC, also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. The Project Site, as with every other property in the Project vicinity, is located within a Methane Hazard Zone, as designated by LADBS. Due to the potential environmental risk associated with Methane Hazard Zones, properties within a Methane Hazard Zone require methane testing and mitigation upon (re)development. In compliance with this requirement, soil-gas testing was conducted in November 2012 which confirmed methane gas concentrations of 8,000 to 402,000 ppmv beneath the Project Site.

Methane Seepage Regulations base the required methane mitigation system on the Site Design Level. There are five site design levels based on the methane concentration at the Project Site. Level I is applicable to concentration levels of 0-100 parts per million by volume (ppmv), Level II is applicable to concentrations of 101-1,000 ppmv, and so on up to Level V for concentrations greater than 12,000 ppmv.

Based on the results of the soil-gas testing, in order to ensure the safety of future occupants of the Proposed Project would be required to comply with Site Design Level V of the City's Methane Seepage Regulations, which is applicable to sites with methane concentrations of 12,000 ppmv and over. Pursuant to the requirements of the methane regulations, the methane mitigation system may require, but not be limited to, a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within the building, and installing a gas (methane) detection system. Design of the methane mitigation system would be confirmed and approved by the DOGGR, LADBS and LAFD prior to the issuance of building permits for the Proposed Project. Regulatory Compliance Measure HAZ-1 below ensures compliance with City code and regulations. Regulatory Compliance Measure HAZ-2 has been included to ensure the protection of construction workers from the potential for methane explosion during earth moving and foundation construction activities.

In addition, the Phase I ESA recommends that a contingency should be provided for handling and potential offsite disposal of natural petroleum impacted soils should they be encountered during future site construction activities. Mitigation Measure HAZ-1 below provides for the mitigation of this possibility.

With the implementation of Regulatory Compliance Measures HAZ-1, HAZ-2 and Mitigation Measure HAZ-1, potential construction and operational impacts from methane gas and petroleum impacted soil would be reduced to a less than significant level.

ix) Oil Wells

As previously discussed, there are no active or abandoned wells on or nearby the Project Site. Therefore, there would be no impacts associated with the risk of upset from active or abandoned wells on or nearby the Project Site during construction and operation of the Proposed Project.

x) Radon

As previously discussed, the Project Site is located in an area of low potential (six percent) for indoor radon levels above the 4.0 pCi/L action level. Therefore, there would be no impacts associated with high levels of radon during construction and operation of the Proposed Project.

xi) Proximity to a School

The closest schools to the Project Site are Cathedral Chapel School (755 S. Cochran Avenue) located approximately one-half mile southeast of the Project Site, and Hancock Park Elementary School (408 S. Fairfax Avenue) located approximately one-half mile northwest of the Project Site. There are no other schools within 0.25 miles of the Project Site. However, the George C. Page Museum, approximately 200 feet west of the Project Site, hosts numerous primary and secondary school children on field trips on a regular basis. As the Proposed Project will comply with all standards, regulations, and good housekeeping practices, it is not anticipated to emit any hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste during construction or operation. Further, implementation of Regulatory Compliance Measure HAZ-1 would prevent the build-up of methane gas at the Project Site to avert the risk of fire or explosion. Therefore, the Project is not expected to adversely affect Cathedral Chapel School, Hancock Park Elementary School or visitors to the George C. Page Museum, and impacts would be less than significant.

xii) Proximity to an Airport or Private Airstrip

The closest public airports to the Project Site are the Burbank Airport, Santa Monica Airport and the Los Angeles International Airport (LAX). However, neither of these airports are located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area⁷, nor is it located in the vicinity of a private airstrip. Therefore, no impact would occur.

xiii) Emergency Response Plan

The Proposed Project is not located on or near an adopted emergency response or evacuation route.⁸ The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and no impact would occur.

xiv) Wildland Fire

The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Fire High Fire Hazard Severity Zone (VHFHSZ).⁹ Therefore, no impact from wildland fires would occur.

⁷ ZIMAS Op Cit.

⁸ Safety Element, Op cit.

⁹ ZIMAS, Op cit.

4. CUMULATIVE IMPACTS

Development of the Proposed Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, following the implementation of Regulatory Compliance Measures RC-HAZ-1 and RC-HAZ-2, and Mitigation Measure MM-HAZ-1, the potential impact associated with the Proposed Project would be less than significant and, therefore, not cumulatively considerable. As with the Proposed Project, with respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, compliance with all applicable local, State, and federal laws regarding hazardous materials would further reduce impacts associated with the development of the related projects. The Proposed Project would not contribute to a cumulatively significant impact with respect to hazardous materials. As a result, cumulative impacts would be less than significant.

5. REGULATORY COMPLIANCE MEASURES AND MITIGATION MEASURES

Regulatory Compliance Measures:

RC-HAZ-1 As the Project Site is within a methane zone, prior to the issuance of a building permit, the Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval.

RC-HAZ-2 During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.

Mitigation Measure:

MM-HAZ-1 If any visual or olfactory indication of potentially contaminated soil, groundwater and/or toxic materials is encountered during demolition, excavation, grading or foundation construction activities, activities shall be temporarily halted. The City of Los Angeles and other appropriate agencies shall be contacted for consultation on the appropriate level of mitigation of the contamination (e.g., excavation and disposal, or treatment in-situ (in-place)) to be implemented so as so render the site suitable for construction activities to resume.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the regulatory compliance measures and the mitigation measure, impacts related to hazards and hazardous materials would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

G. LAND USE PLANNING

1. INTRODUCTION

This section evaluates the Proposed Project's potential land use impacts based upon whether the project would physically divide an established community, the physical compatibility of the Proposed Project with its surrounding area and vicinity, consistency with applicable local and regional plans, regulations and policies of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating environmental impacts. Whether the Proposed Project would impact any applicable habitat conservation plan or natural community conservation plan was previously discussed in section IV.A., Impacts Found to be Less Than Significant of this Draft EIR.

2. ENVIRONMENTAL SETTING

A. Project Site

i) Existing On-Site Land Uses

The Museum Square site is a rectangular shaped property that is approximately 7-1/2 acres (327,613 square feet); it is fully developed with a commercial office complex with an associated surface parking lot and parking structure, located at 5757 W. Wilshire Boulevard, between Curson Avenue and Masselin Avenue in the Wilshire Community Plan Area of the City of Los Angeles (see Figure II-1, Regional and Project Vicinity Map). As illustrated in Figure II-2, Aerial Map, the Project Site is bounded to the south and east by commercial buildings and parking structures, to the north by a multi-family residential building, and to the west of the Museum Square site is Hancock Park and the George C. Page Museum, which is part of the Natural History Museum of Los Angeles County and includes the La Brea Tar Pits and associated paleontological sites¹. The 20-acre, seven building campus of the Los Angeles County Museum of Art (LACMA) is located to this west of this facility.

The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot. The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site, to create a separate, financeable parcel under the new building. Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story commercial office building and the addition of two new levels of parking to the existing five-level parking structure. No structures are located on the portion of the Project Site proposed for development of the new office building.

¹ For purposes of this EIR, references to "Hancock Park" are meant encompass the Page Museum, La Brea Tar Pits, excavation pits, observation pits, gardens, walkways and open space areas associated with this facility.

There are 43 trees with a trunk diameter greater than eight inches (8") in diameter at breast height (DBH) located in the area of the Project Site that will be redeveloped; all of the trees are ornamental/non-native species. An approximately 12 foot high hedgerow of Indian Laurel Fig (*Ficus retusa nitida*) currently screens the surface parking lot from view along Curson Avenue. There are two Jacarandas (*Jacaranda mimosifolia*) planted as street trees in the parkway along Curson Avenue in front of the Proposed Project Site. The topography of the Project Site is relatively flat, with a gradual slope from the north to the south. Photographs depicting land uses on the Project Site and the immediate surrounding area are provided in Section III, Environmental Setting.

ii) Surrounding Uses

The Project Site is located on a heavily trafficked segment of Wilshire Boulevard in the Miracle Mile area of the City west of downtown Los Angeles and Mid-City. The land uses within the general vicinity of the Project Site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction.

The area immediately surrounding the Project Site is developed with a mix of multi-family residential, commercial, retail and institutional buildings with associated parking structures and surface parking lots, of varying architectural style and dates of construction. Sharing the block and to the immediate north of the Project Site are five-story Museum Terrace Apartments building (600 S. Curson Avenue) and the five-story Masselin Park West apartment building (5700 W. 6th Street). To the north of that, across W. 6th Street, is the 160 acre, Park La Brea residential development which includes 18 Art Deco style apartment towers, along with numerous Modern Colonial style low-rise townhouse and garden apartment buildings, providing over 4,000 residences and affiliated on-site amenities. Sharing the parcel and to the south of the Project Site, fronting along Wilshire Boulevard, is the existing 11-story, approximately 530,000 square foot Museum Square Office building complex, which includes office, banking, concierge, conferencing facility, convenience store, dry cleaning and restaurant uses. Across Wilshire Boulevard, south of the Project Site, is the Wilshire Courtyard complex (5700 and 5750 Wilshire Boulevard), comprised of two six-story commercial office buildings linked by a central drive and park-like open spaces. Directly east of the Project Site (across Masselin Avenue) are a two-story commercial retail building housing an Office Depot store and two five-story, multi-family residential developments; Renaissance Apartment Homes located at 630 Masselin Avenue and Tiffany Court Apartment Homes, located at 616 Masselin. West of the Project Site is Hancock Park and the George C. Page Museum, which is part of the Natural History Museum of Los Angeles County and includes the La Brea Tar Pits and associated paleontological sites. The 20-acre, seven building campus of the Los Angeles County Museum of Art (LACMA) is located to this west of this facility. Photographs depicting surrounding land uses of the Project Site are provided in Section III, Environmental Setting.

iii) Applicable Land Use Policies and Regulations

The Project Site is located in the Miracle Mile area of the City of Los Angeles. As such, the Project Site is subject to the applicable policies and zoning requirements of several local and regional plans. At the regional/subregional level, development within the Project Site is subject to the State Senate Bill 375, Southern California Association of Governments' (SCAG) *2008 Regional Comprehensive Plan*, SCAG's *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*, SCAG's *Southern California Compass Blueprint Growth Vision Report*, the South Coast Air Quality Management District's (SCAQMD) *2007 Air Quality Management Plan* (the "AQMP"), and the Los Angeles County Metropolitan Transportation Authority's (Metro) *Comprehensive Management Plan for Los Angeles County* (CMP). At the City level, development within the Project Site is subject to the *City of Los Angeles General Plan*

(General Plan), the *Wilshire Community Plan* (Community Plan), , and the *City of Los Angeles Municipal Code* (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (the “Planning and Zoning Code”). The Project Site is located within the *Miracle Mile Community Design Overlay District* and is subject to the City of Los Angeles Planning Department *Walkability Checklist*. An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may be less relevant to an environmental impact analysis.

1) Senate Bill 375

In 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32) into law, which requires that California greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020, a reduction of 28.3 percent from existing levels. As shown in Figure IV.G-1 (Southern California Association of Government Subregions), it includes input from each of the 14 subregions that make up the Southern California percent from existing levels. Subsequently, the Legislature adopted Senate Bill 375 (SB 375”) as one means of meeting the mandate of AB 32. Effective as of January 1, 2009, SB 375 directs local governments to modify their approach to regional planning and calls for the integration of transportation, land use, and housing planning in regional plans.

SB 375 requires the California Air Resources Board (CARB) to develop regional reduction targets for GHG emissions, and calls for the creation of regional plans to reduce those emissions from vehicle use (passenger vehicles and small trucks) throughout the state. With those targets in mind, California’s 18 Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), must develop “Sustainable Community Strategies” (SCS). The MPOs are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed reduction targets by 2020 and 2035. The MPOs must develop an Alternative Planning Strategy (APS) if the SCS cannot reach the regional target.

SB 375 has special provisions that apply to SCAG. It states that “a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy ... for that subregional area.” In addition, SB 375 authorizes SCAG to “adopt a framework for a subregional SCS or a subregional APS to address the intraregional land use, transportation, economic, air quality, and climate policy relationships.” Finally, SB 375 requires SCAG to “develop overall guidelines, create public participation plans, ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.” See Government Code Section 65080(b)(2)(C).

On April 4, 2012, SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future. The Proposed Project’s consistency with the RTP/SCS and smart growth principles that are embodied in SB 375 are analyzed in Section IV.C (Air Quality). Among other design concepts, these principles call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors. Sponsors of the SB 375 have stated that because most people commute to work, and cars and light trucks generate approximately 30 percent of the GHG emissions in California, reducing the amount of GHGs emitting into the environment is partially dependent on increasing the number of jobs near residential development to shorten commute times. According to the principles of “smart growth,” solutions to ever-increasing commute times include enabling more Californians to live near where they work and/or to increase the ridership of public transportation. The simple theory behind SB 375 is that if Californians spend less time in their

vehicles, those vehicles would emit fewer GHGs. This can be done, in part, by locating growth in areas already devoted to urban uses that are readily accessible to transit.

2) Regional Plans

a) 2008 Regional Comprehensive Plan

SCAG prepared and issued the *2008 Regional Comprehensive Plan* (“RCP”) in response to SCAG’s Regional Council directive in the 2002 Strategic Plan to define solutions to inter-related housing, traffic, water, air quality, and other regional challenges.² The most recent RCP, adopted October 2, 2008, serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life.³ The RCP incorporates principles and goals of the Compass Blueprint Growth Vision, as discussed below. The RCP includes nine chapter areas: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. Each chapter is organized into three sections: goals, outcomes, and action plans. Each action plan contains “Constrained Policies”, which provide a series of recommended near-term policies that developer and key stakeholders should consider for implementation. A comprehensive review and consistency analysis for each of the RCP goals and policies is discussed in greater detail in Table IV.G-1 (Project Consistency with the Applicable Regional Comprehensive Plan Objectives).

b) Southern California Compass Blueprint Growth Vision

The *Southern California Compass Blueprint Growth Vision Report* (Compass Growth Vision), published by SCAG in June 2004, presents a comprehensive vision for growth in the six-county SCAG region, as well as the means of achieving that growth vision. The Compass Growth Vision is intended to provide planning guidance and mechanisms for improved mobility, livability, prosperity, and sustainability for all Southern Californians by reorienting development around existing and planned transportation infrastructure on just 2 percent of the region’s land area. The Compass Growth Vision notes that limitations on the amount of undeveloped land suitable for development may hinder the ability to accommodate new housing and jobs within the region. The report identified that under current adopted general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land. Infill, or new development in already developed areas, would be relied upon to provide locations for nearly half of the anticipated new housing region-wide. The Compass Growth Vision concludes that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure would prove to be of enormous benefit in accommodating future growth, while also recognizing that incremental and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to individual cities. These projected benefits led to the Compass Growth Vision being incorporated into the region’s *Regional Transportation Plan*.

² *Southern California Association of Governments Final 2008 Regional Comprehensive Plan*, website: <http://scag.ca.gov/rcp/index.htm>, June 20, 2013.

³ Final 2008 RCP, *Op cit*.



Source: <http://www.scag.ca.gov/eMap/images/subregion.jpg>, 2012.

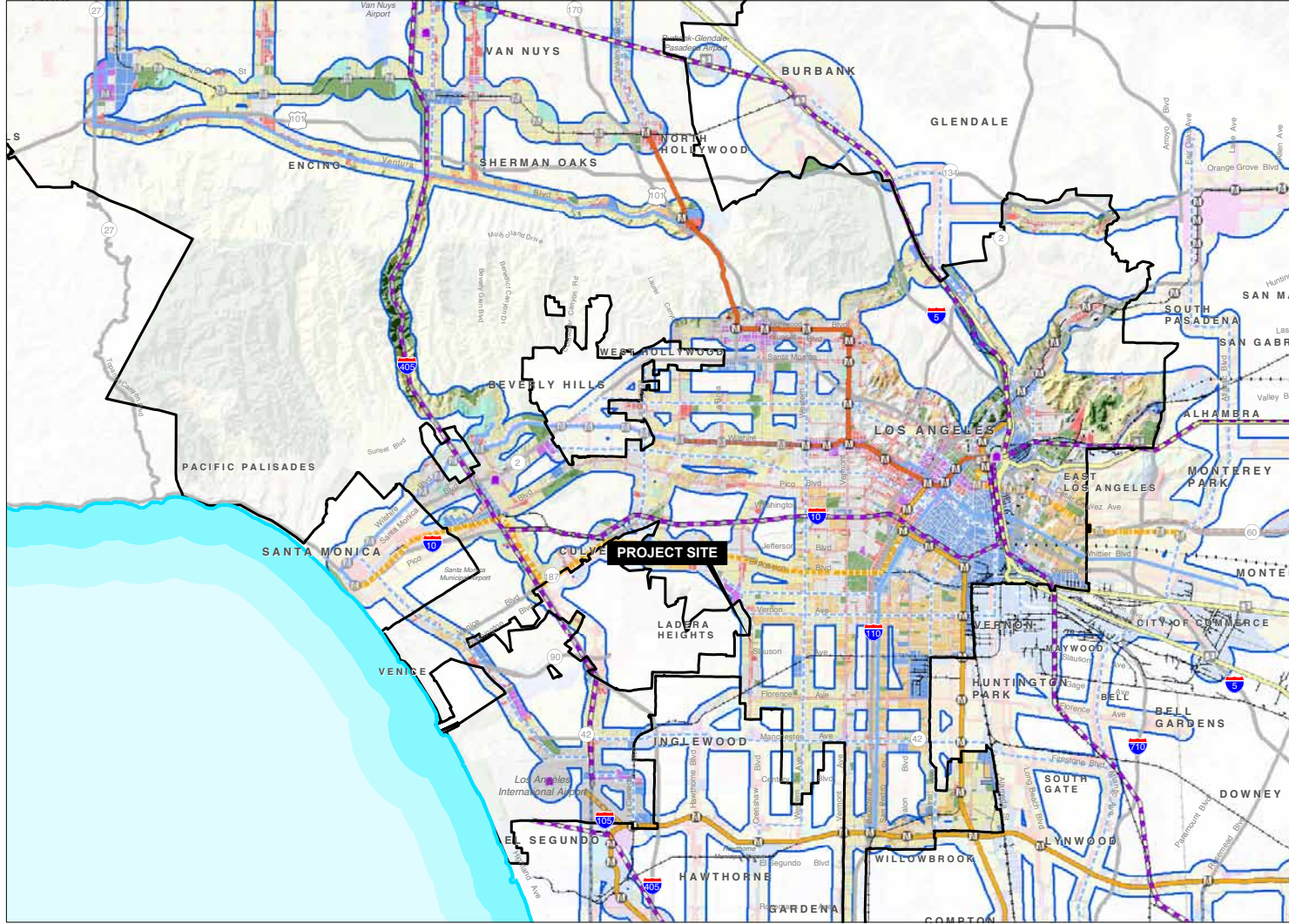
The Compass Growth Vision's "2 Percent Strategy" calls for changes to current land use and transportation trends within the 2 Percent Strategy Opportunity Areas. The 2 Percent Strategy was created to implement the Compass Growth Vision, by working closely with local jurisdictions and the public at large. The 2 Percent Strategy Opportunity Areas comprise approximately 2 Percent of the land in Southern California and are made up primarily of local areas of regional significance that are currently, or are projected to be, major employment and residential centers, areas attracting large numbers of work commuters that are well-accessible by both highway and transit, city centers, rail transit stops, bus rapid transit corridors and airports, ports, and industrial centers that are significant in the region's economy. Priority residential in-fill areas that have the potential to absorb a fair share of projected regional residential growth and to provide regional and sub-regional transportation benefits are also identified as areas of opportunity. Figure IV.G-2 (Compass Blueprint Growth Vision-City of Los Angeles-North) depicts the 2 Percent Strategy Opportunity Area for the City of Los Angeles (North Area). The intent of the 2 Percent Strategy is to increase the region's mobility by encouraging transportation investments and land use decisions that are mutually supportive; locating new housing near existing jobs and new jobs near existing housing; encouraging transit-oriented development; and promoting a variety of travel choices. The strategy has identified a series of opportunity areas having a high potential to implement projects, plans, and/or policies consistent with the principles resulting in the aforementioned benefits.

The Compass Growth Vision principles and related strategies are as follows:

- Principle 1.* Improve mobility for all residents. Strategies to support Principle 1 include: (a) encourage transportation investments and land use decisions that are mutually supportive; (b) locate new housing near existing jobs and new jobs near existing housing; (c) encourage transit-oriented development; and (d) promote a variety of travel choices.
- Principle 2.* Foster livability in all communities. Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- Principle 3.* Enable prosperity for all people. Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.
- Principle 4.* Promote sustainability for future generations. Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize "green" development techniques.

A comprehensive review and consistency analysis for each of the Compass Growth Vision principles is discussed in greater detail and compared to the Proposed Project under the "Project Impacts" subheading later in this Section.

City of Los Angeles - Central



City Limits
 Subregional Boundaries
 Compass 2% Strategy Opportunity Areas

Interstate
Freeway
Highway
Arterial
Minor Street
Railroad

Existing Transit
 Metro Rail Transit Station
 Metrolink Commuter Rail Station
 Metro Rapid Bus
 Metro Red Line Heavy Rail
 Metro Light Rail
 Metrolink Commuter Rail

Planned Transportation Projects
 Metro Rail Transit Station
 Metrolink Commuter Rail Station
 Metro Rapid Bus
 Busway/Transitway
 Light Rail
 Metrolink Commuter Rail
 Railroad

Potential Transportation Projects
 Metro Rail Transit Station
 Metro Rapid Bus
 Busway/Transitway
 Heavy Rail
 Light Rail
 Light Rail (Alignment to be Determined)
 Rail (Technology Unspecified)
 Truck Lane
 Railroad

Maglev
 Station
 Rail Alignment

Simplified General Plan
 Commercial/Downtown
 Office/Business Park
 Industrial/Airport/Harbor
 Mixed Use
 Specific Plan/Planned Development
 High Density Residential
 Medium to Low Density Residential
 Agriculture/Rural Residential
 Public/Indian Reservation
 Open Space
 Open Water/Floodways
 Other

1 0.5 0 1 2 3 Miles
 6,000 3,000 0 6,000 12,000 18,000 Feet

Source: Compass Blueprint 2010.



Figure IV.G-2
 Compass Blueprint Growth Vision-City of Los Angeles-Central



c) Regional Transportation Plan / Sustainable Communities Strategy

Federal guidelines require that all new regionally significant transportation projects be included in a *Regional Transportation Plan* (RTP) before they can receive federal or State funds or approvals. Metro submits the program of Los Angeles County projects for inclusion in the Regional Transportation Improvement Program (RTIP). The RTP must be updated and federally approved every three years. Federal approval requires a positive demonstration that the RTP projects would not generate travel emissions that exceed those assumed in the applicable *Air Quality Management Plan*; this requirement is known as “transportation conformity”.

As previously discussed, SCAG adopted the *2012-2035 Regional Transportation Plan / Sustainable Communities Strategy: Towards a Sustainable Future* (RTP/SCS) on April 4, 2012. The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region’s residents. For the first time, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB as required by SB 375. The RTP/SCS provides an alternative to “business as usual” development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by State and federal agencies in June 2012, the RTP/SCS includes approximately \$180 billion in projected funding for transportation projects for Los Angeles County.

The RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region’s needs through 2035. The RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2012-2035 RTP/SCS is guided by and incorporates all projects from Metro’s own Long-Range Transportation Plan. A total of 1,614 Los Angeles County-specific projects are contained in the 2012-2035 RTP/SCS.⁴ On June 6, 2013, the Transportation Committee of SCAG approved Amendment #1 to the RTP/SCS and Amendment #13-04 to the 2013 Federal Transportation Improvement Program (FTIP) after a 30-day public review and comment period. The Draft Amendments were developed as a response to changes to projects in the 2012-2035 RTP/SCS and 2013 FTIP.⁵

The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. Goals and policies relevant to the Proposed Project are provided in Table IV.G-2 (Consistency of the Proposed Project with the Applicable Goals of the RTP/SCS) with a consistency analysis. Regional transportation impacts of the Proposed Project are analyzed in greater detail in Section IV.C (Traffic/Transportation) of this EIR.

d) South Coast Air Quality Management District

The Project Site is located within the South Coast Air Basin (Basin) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD

⁴ *Benefits of the 2012–2035 RTP/SCS for City of Los Angeles Subregion factsheet. Website: <http://scag.ca.gov/publications/pdf/benefitsFS/LosAngelesCityLA.pdf>, accessed July 24, 2013.*

⁵ *Amendment 1 to the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. Website: <http://rtpscs.scag.ca.gov/Pages/Amendment-1.aspx>, accessed July 24, 2013.*

is responsible for formulating and implementing air pollution control strategies. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Air quality impacts of the Proposed Project and consistency of the project impacts with the AQMP are analyzed in greater detail in Section IV.C (Air Quality) of this EIR.

e) Congestion Management Plan

Within Los Angeles County, the Metro is the designated congestion management agency responsible for coordinating regional transportation policies. The Congestion Management Program (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects, which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Metro is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Proposed Project's Transportation Study, which is presented in greater detail in Section IV.C (Traffic/Transportation) of this EIR, was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (LADOT) Guidelines.

3) Local Plans

a) City of Los Angeles General Plan

Land uses on the Project Site are guided by the City of Los Angeles General Plan (General Plan). The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses City-wide policies, and also includes the 35 community plans that guide land use at a more local level.

i) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework), adopted in December 1996, and readopted in August 2001, sets forth a City-wide comprehensive long-range growth strategy and defines City-wide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework land use policies are implemented at the community level through community plans and specific plans.

The Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. The Framework includes a Long Range Land Use Diagram for the metro region, which identifies the Project Site as Regional Center (see Figure IV.G-3 [Long-Range Land Use Diagram]). According to the Framework's Long-Range Land Use Diagram for the metro region, the Regional Center is an area targeted for high-density, and a focal point of regional commerce, identity, and activity.⁶ Table 3-1 of the Framework lists the following as "encouraged uses" within a Regional Center: corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and similar uses.⁷ In addition to these uses, a Regional Center contains a diversity of uses such as mixed-use structures which integrate housing with commercial uses, and multi-family housing (independent of commercial), along with the inclusion of small parks and other community-oriented activity facilities.⁸ Regional Centers generally range from floor area ratios of 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by buildings of 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.⁹

The Urban Form and Neighborhood Design chapter of the Framework establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and city-wide scales. "Urban Form" refers to the general pattern of building height, development intensity, and structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood Design" refers to the physical character of neighborhoods and communities within the City. The Framework does not directly address the design of individual neighborhoods or communities, but embodies generic neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the updating of community plans. With respect to neighborhood design, the Framework's Urban Form and Neighborhood Design chapter encourages growth in centers that have a sufficient base of both commercial and residential development to support transit service.

The Open Space and Conservation chapter of the Framework calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply, and therefore suggests that vacated railroad lines, drainage channels, planned transit routes, and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

⁶ *City of Los Angeles Department of City Planning, City of Los Angeles General Plan Framework, Long Range Land Use Diagram, Metro.*

⁷ *Op. Cit., Table 3-1, Land Use Standards, page 3-23.*

⁸ *Op. Cit., page 3-40.*

⁹ *Op. Cit., Table 3-1, Land Use Standards, page 3-23.*

INTRODUCTION

The General Plan Framework is a long range, citywide, comprehensive growth strategy. It is a special element of the general plan which looks to the future as required by law and replaces Concept Los Angeles and the Citywide Plan (adopted in 1974). Because it looks at the city as a whole, the Framework provides a citywide context within which local planning takes place. Both the benefits and challenges of growth are shared.

The Framework sets forth a conceptual relationship between land use and transportation on a citywide basis and defines new land use categories which better describe the character and function of the city as it has evolved over time. The new categories - Neighborhood District, Community Center, Regional Center, Downtown Center and Mixed Use Boulevards - are broadly described (with ranges of intensity/density, heights and lists of typical uses) and generally shown on this long range land use diagram. The definitions reflect a range of land use possibilities found in the city's already diverse urban, suburban and rural land use patterns - patterns which have evolved over time at different rates and in different locations. Their generalized locations reflect a conceptual relationship between land use and transportation.

Because it is citywide, the Framework cannot anticipate every detail. Therefore, the community plans must be looked to for final determinations as to boundaries, land use categories, intensities and heights that fall within the ranges described by the Framework.

The Citywide General Plan Framework Element neither overrides nor supersedes the Community plans. It guides the city's long range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and community plans. The Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.

LEGEND Districts, Centers & Mixed Use Boulevards



Neighborhood District

A focal point for surrounding residential neighborhoods and containing a diversity of land uses such as restaurants, retail outlets, grocery stores, child care facilities, small professional offices, community meeting rooms, pharmacies, religious facilities and other similar services. The clustering of uses minimizes automobile trip-making and encourages walking to and from adjacent neighborhoods. Pedestrian-oriented areas are encouraged, and the district may be served by a local shuttle service. Generally, Neighborhood Districts are at a floor area ratio of 1.5:1 or less and characterized by 1- or 2-story buildings.



Community Center

A focal point for surrounding residential neighborhoods and containing a diversity of uses such as small offices and overnight accommodations, cultural and entertainment facilities, schools and libraries, in addition to neighborhood oriented services. Community Centers range from floor area ratios of 1.5:1 to 3.0:1. Generally, the height of different types of Community Centers will also range from 2- to 6-story buildings, e.g., some will be 2-story Centers, some 4- or 6-story Centers depending on the character of the surrounding area. Community Centers are served by small shuttles, local buses in addition to automobiles and/or may be located along rail transit stops.



Regional Center

A focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Generally, different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.



Downtown Center

An international center for finance and trade that serves the population of the five county metropolitan region. Downtown is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Convention Center. The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high rise buildings.



Mixed Use Boulevard

These connect the city's neighborhood districts and community, regional and Downtown centers. Mixed Use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. Generally, different types of Mixed Use Boulevards will fall within a range of floor area ratios from 1.5:1 up to 4.0:1 and be generally characterized by 1- to 2-story commercial structures, up to 3- to 6-story mixed use buildings between centers and higher buildings within centers. Mixed Use Boulevards are served by a variety of transportation facilities.

Relationship To Community Plans

Adoption of the Framework neither overrides nor mandates changes to the Community Plans. The Community Plans reflect appropriate levels of development at the time of the Framework's adoption. As community plans are updated utilizing future population forecasts and employment goals, the Framework is to be used as a guide - its general recommendations to be more precisely determined for the individual needs and opportunities of each community plan area. During that process, nothing suggests that a community plan must be amended to the higher intensities or heights within the ranges described in the Framework. The final determination about what is appropriate locally will be made through the community plans - and that determination may fall anywhere within the ranges described.

As the city evolves over time, it is expected that areas not now recommended as Neighborhood Districts, Community and Regional Centers, and Mixed Use Boulevards may be in the future appropriately so designated, and areas now so designated may not be appropriate. Therefore, the Framework long range diagram may be amended to reflect the final determinations made through the Community Plan update process should those determinations be different from the adopted Framework.

Examples of the application of Framework definitions:

1. A Regional Center located in a low- to mid-rise suburban area characterized by large vacant lots may have a lower intensity, while an urban area, where most lots are smaller and built upon at higher intensities may have higher overall intensities. While the uses of these two types of Regional Centers will generally be the same (e.g., large office buildings, major entertainment facilities, extensive retail, including large shopping malls, overnight accommodations, served by major transportation and close to housing), the development characteristics will differ and be determined through the Community Plan process, taking into account the surrounding area.
2. A Community Center in one part of the city may be identified for a low intensity, e.g., floor area ratio of 1.5:1 and a height of 3 stories, while in another part of the City, a Community Center may start with a low intensity, e.g., floor area ratio of 1.5:1, but permit a bonus density (e.g., permit an additional floor area ratio of 0.5:1) and higher building heights whenever new development also includes housing.

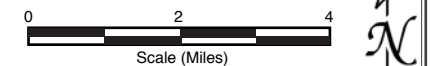
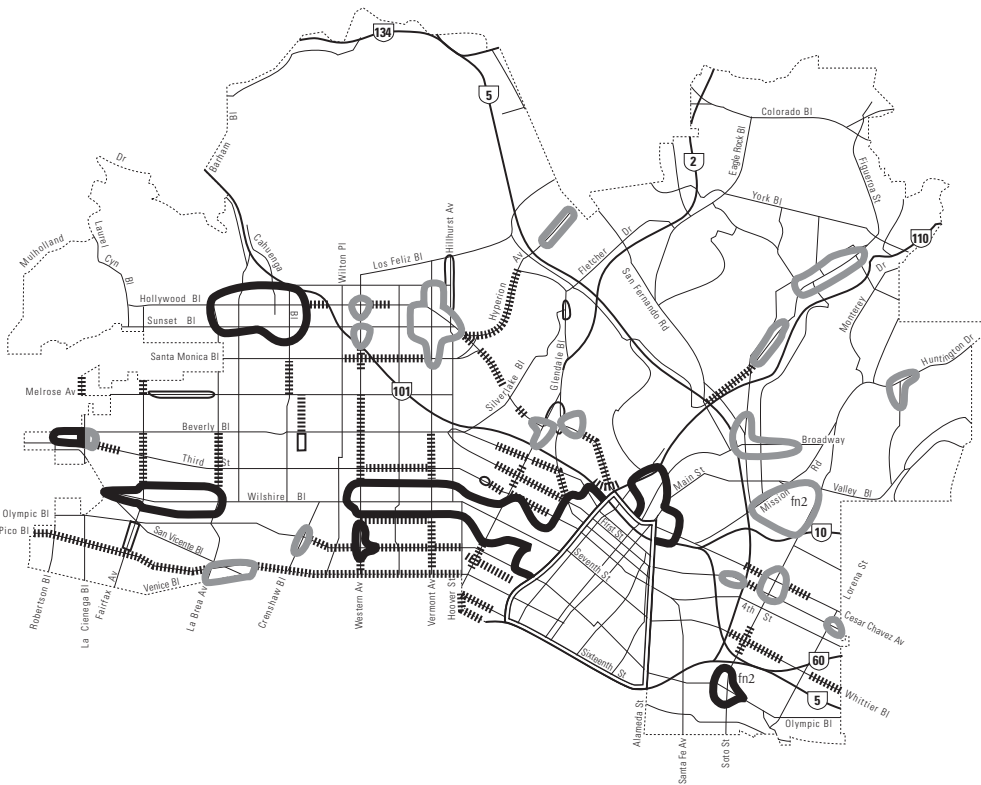
These kinds of more precise determinations are made through the Community Plans. The General Plan Framework provides the range within which the determinations are made.

Relationship To Specific Plans

The city has a number of adopted specific plans which set detailed development regulations for local areas and include various types of regulatory limitations. Examples of these limitations include "trip caps," Design Review Boards, density/intensity limits, maximum heights, landscape, lot coverage, etc. The General Plan Framework is consistent with and does not supersede nor override these local requirements.

Footnotes

1. The General Plan Framework is comprised of the generalized Long Range Land Use Diagram, policies and programs. For a comprehensive understanding of the Framework's recommendations, both maps and text should be consulted.
2. Special Study Area: Future changes in use require approval by appropriate decision makers through appropriate studies and procedures. Changes may result in a community plan amendment, specific plan, development agreement, change of zone, and may include further restrictions, if necessary.
3. As decisions are made to fund or withdraw funding from transit stations, adjacent land uses will be re-evaluated.
4. Compact areas identified for future growth are known as Districts, Centers and Mixed Use Boulevards. They are also defined by their function within the community, citywide and regional context and take into consideration adjacent property in adjoining cities when appropriate. They offer a range of development potential because some are developed to their maximum, while others are not.



Source: City of Los Angeles General Plan Framework, February 19, 2003.

The Transportation chapter of the Framework includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. The Transportation chapter acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City's economy, as well as the living environment of its citizens.¹⁰ The Transportation chapter stresses that transportation investment and policies would need to follow a strategic plan, including capitalizing on currently committed infrastructure and adoption of land use policies to better utilize committed infrastructure. The Transportation chapter of the Framework is implemented through the Transportation Element of the General Plan.

The applicable policies and the consistency analysis of each of the Framework chapters are discussed in Table IV.G-3 (Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element).

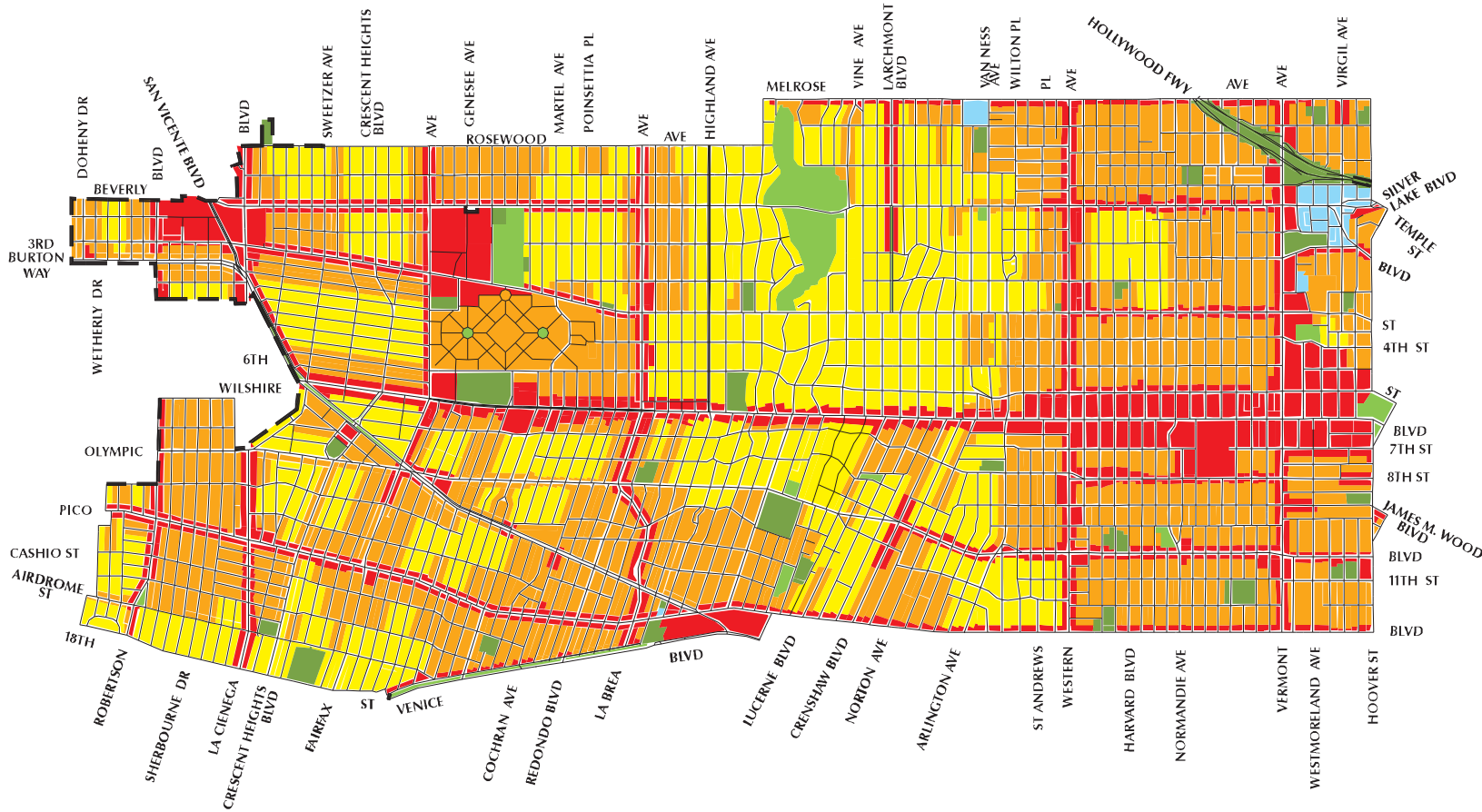
ii) Wilshire Community Plan

The Community Plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plans are also intended to guide development in order to create a healthful and pleasing environment. The Community Plans coordinate development among the various communities of the City of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Wilshire Community Plan guides land uses on the Project Site and in the surrounding areas. The current plan (adopted Sept. 19, 2001) sets forth planning goals and objectives to maintain the community's distinctive character by:







- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.¹¹

¹⁰ *Op. Cit., page 8-2.*

¹¹ *Wilshire Community Plan, Sept. 19, 2001, page II-3.*



LEGEND

- | | |
|---|---|
|  Residential Single Family |  Industrial |
|  Residential Multiple Family |  Open Space |
|  Commercial |  Public Facilities |

Source: City of Los Angeles Department of City Planning, September 12, 2012.



As shown in Figure IV.G-4 (Wilshire Community Plan Land Use Designations), the Community Plan designates the Project Site for Commercial use. This land use designation corresponds with the CR, C1.5, C2, C4, P, PB, RAS3, RAS4, R3, R4 and R5 zoning classifications and allows for a FAR of up to 6:1. An assessment of the Proposed Project's compliance with the purpose of the Community Plan is presented later in this Section in Table IV.G-4 (Comparison of Wilshire Community Plan Objectives to Proposed Project Characteristics).

b) The Miracle Mile Community Design Overlay District (CDO)

The Miracle Mile is a one mile commercial corridor fronting Wilshire Boulevard, generally recognized as extending from Sycamore Avenue to Fairfax Avenue. The Project Site is located within the Miracle Mile CDO (refer to Figure G-5, Miracle Mile Community Design Overlay District Map). Conceived as an affluent shopping area for the nouveau riche in the early twenties, real estate developer A.W. Ross designed the district with the newly introduced automobile in mind. As a result, Wilshire Boulevard was much wider than other streets in the City at the time with large storefronts and windows so that motorists could easily see what was inside of the stores lining the roadway. However, unlike commercial strip malls of today, the Miracle Mile still resembled a traditional main street with a strong pedestrian orientation. Thus, the Miracle Mile was developed to accommodate both pedestrians and automobiles with parking located in the rear and two dominant entrances, one in the front for pedestrians and one in the rear for those traveling by car. These retail buildings were highly stylized, designed in Art Deco, and constructed of high quality materials to lure wealthy clients. Today, Miracle Mile is characterized by numerous high rise office buildings, neighborhood retail, well-known entertainment establishments and the City's greatest concentration of museums.¹²

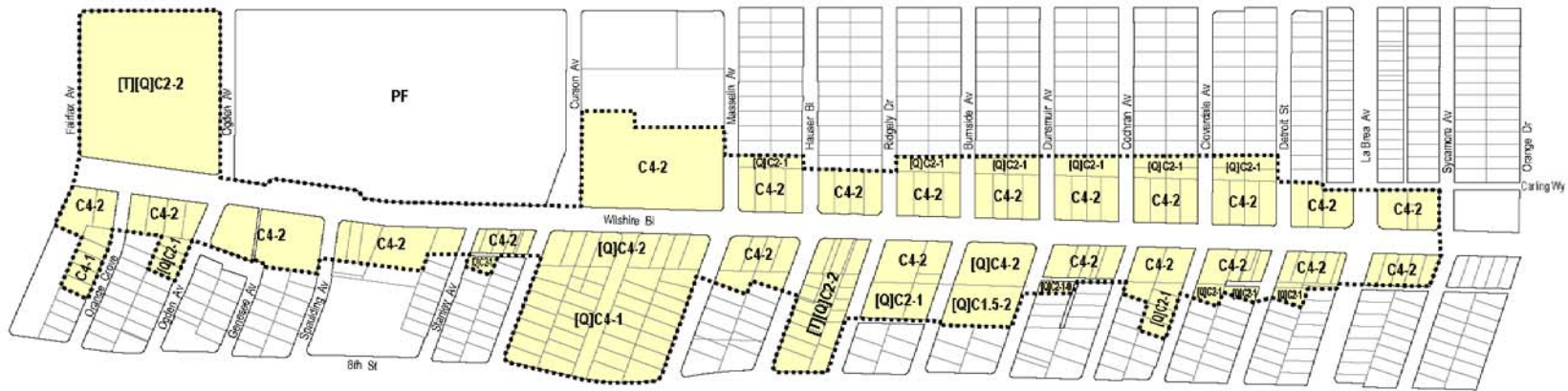
The CDO provides guidelines and standards for public and private development projects in commercially zoned areas along the Miracle Mile. The intent of the CDO is to provide guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity and promote the pedestrian environment of the District.

An assessment of the Proposed Project's compliance with the purpose of the CDO and the CDO Development Standards and Design Guidelines is presented in Table IV.G-5 (Miracle Mile CDO Consistency Analysis).

c) City of Los Angeles Planning and Zoning Code

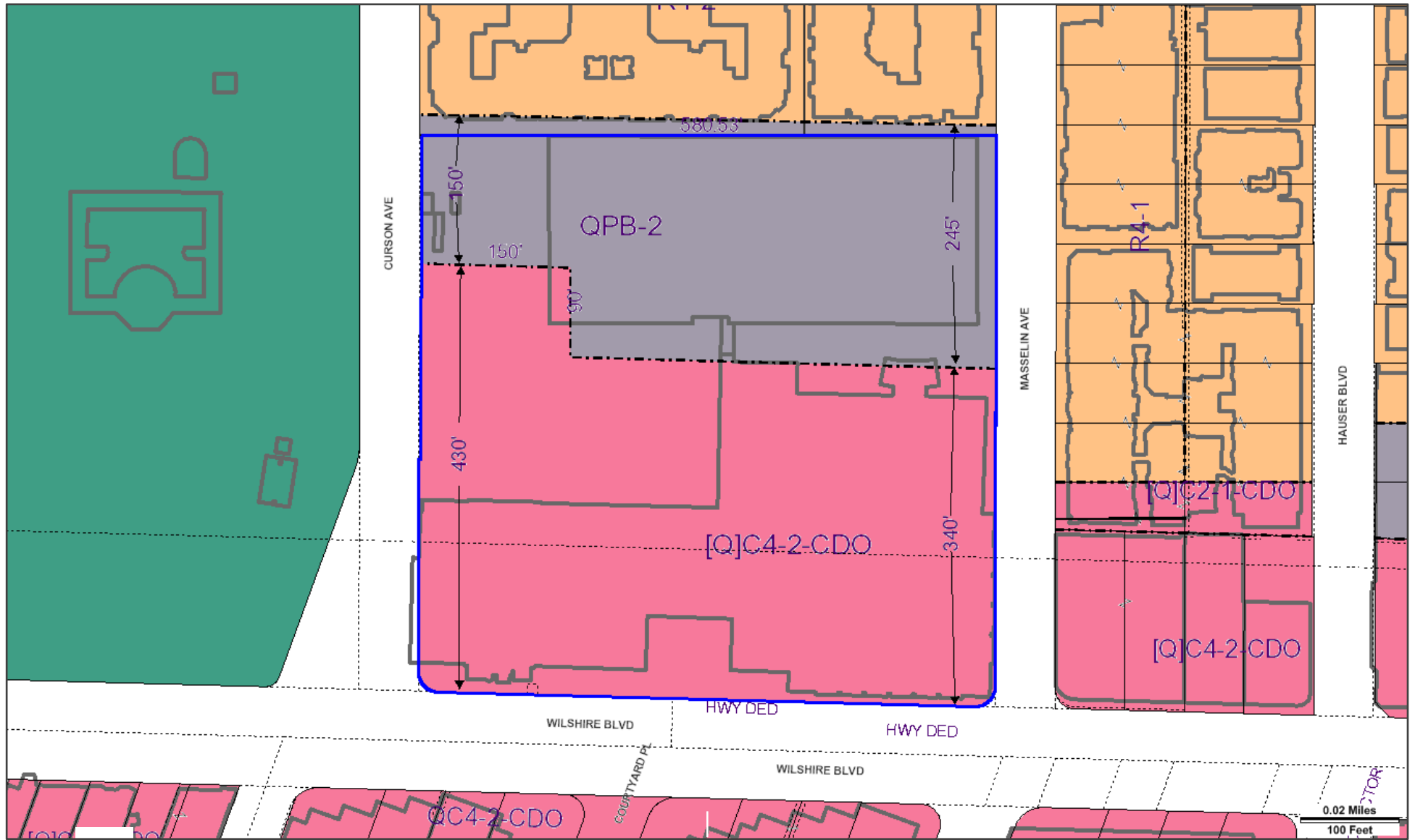
All on-site development activity is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. As shown in Figure IV.G-6 (Existing City Zoning Designations), at present, the northern approximate third of the parcel is zoned Q-PB-2. This zoning was put into place when the currently existing parking structure was approved in 1983. The remaining portion of the Project Site is zoned Q-C4-2-CDO (where C4 = Commercial; 2 = Height District No. 2), which is consistent with Regional Center Commercial land uses in the Wilshire Community Plan/Miracle Mile CDO. The Height District 2 permits a Floor Area Ratio (FAR) of 6:1 with no height limit.

¹² *Miracle Mile Community Design Overlay District, Development Standards and Design Guidelines, Page 3*



Source: City of Los Angeles Department of City Planning, January 16, 2005.





Source: City of Los Angeles Department of City Planning, November 28, 2012.

The 'Q' conditions were imposed on the Project Site with the approval of the Miracle Mile CDO by City of Los Angeles Ordinance Nos. 176,332, 176,333, and 176,334 effective January 16, 2005. Along with requiring projects within the CDO to comply with the Development Standards and Design Guidelines, the Q-condition on the PB zoned portion of the property limits the parking structure to five levels and requires 15 foot landscaped buffer setbacks along the west and east property lines.

i) Permitted Uses

Uses allowed in the C4 zone include uses allowed in the C2 zone (i.e., bank, club, hotel, public parking area, child care facilities, residential uses, etc.); uses allowed in the C1 zone (i.e., office, business or professional, television production [no outdoor sets], bakery, barber, stationery store, drug store, grocery store, etc.); uses allowed in the C1.5 zone (i.e., auditorium, broadcasting studio, department store, museum, theater, etc.); uses allowed in the R4 zone (i.e., multiple dwellings, group dwellings, and apartment houses); and more extensive retail stores (i.e., pet store, restaurant, art or antique shop, and tire shop).¹³

ii) Setback Requirements

Pursuant to LAMC Section 12.14.C.1 and 12.16.C, within the C4 zone, front yard setbacks are not required. Furthermore, side and rear yard setbacks are not required for buildings used exclusively for commercial purposes. For buildings more than two stories in height, one foot shall be added to the width of the side yard for each additional story above the second story, not to exceed 16 feet in width. For a building more than three stories in height, one foot shall be added to the depth of the rear yard for each additional story above the third story, not to exceed 20 feet in depth.

iii) Height District

The Project Site is located within Height District 2. The Height District 2 permits a Floor Area Ratio (FAR) of 6:1 with no height limit.

iv) Parking Requirements

Parking requirements for commercial development are subject to the Planning and Zoning Code. Pursuant the Planning and Zoning Code, one parking space is required for every 500 square feet of commercial office uses.¹⁴ The auditorium use within the existing Museum Square complex requires one parking space for every 35 square feet.

v) Sign Regulations and Policies

The City of Los Angeles regulates the placement, construction, and modification of all exterior signs and sign support structures through Section 14.4 of the Planning and Zoning Code. Building permits must be obtained from the Department of Building and Safety for any proposed signs and electrical permits must be obtained for signs illuminated by electrical lighting. Specific LAMC requirements and restrictions are dependent upon signage type; however, general constraints on design, construction, materials,

¹³ See LAMC § 12.16.A.

¹⁴ LAMC § 12.21(A)(4)(i).

potential for hazard to traffic and determination of such hazards are applicable. Further signage guidelines are contained the CDO Development Standards and Design Guidelines.

d) CALGreen Building Code

The 2013 California Green Building Standards Code, referred to as CALGreen, became effective on January 1, 2014. CALGreen sets minimum standards that all new structures can meet to minimize significantly the state's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new CALGreen standards. The CALGreen Standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

CALGreen requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. CALGreen's mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs in a slow economy.

CALGreen has mandatory measures as well as more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The nonresidential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

The code addresses the critical issue of compliance verification by utilizing the existing building code enforcement infrastructure. The mandatory CALGreen measures would be inspected and verified by local building departments, using special inspectors as they determine necessary.

e) Los Angeles Green Building Code

As of January 3 2014, the City of Los Angeles has implemented Ordinance No. 182,849

as the most recent update to the Los Angeles Green Building Code ("LA Green Building Code"). The LA Green Building Code is based on the 2013 California Green Building Standards Code (commonly known as CALGreen as discussed above), that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All addition (residential and non-residential)
- Alterations with building valuations over \$200,000 (residential and non-residential)

f) United States Green Building Council

Projects have the option to meet the intent of the criteria of the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) rating system's "certified" performance level. Developers are required to submit a LEED checklist, a signed declaration from a LEED accredited professional asserting that the project would meet the intent of the LEED rating system's "certified" level, and a set of plans that identifies the LEED measures.

g) City of Los Angeles Planning Department Walkability Checklist

In January of 2007, the City of Los Angeles Planning Department created the *Walkability Checklist: Guidance for Entitlement Review* (Walkability Checklist). The purpose of the Walkability Checklist is to guide the City of Los Angeles Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City of Los Angeles. The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. Each of the implementation strategies on the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the General Plan Framework Element. Incorporating these guidelines into a project's design encourages pedestrian activity, more adequate forms, and placemaking. Guidelines that apply to the Proposed Project are described in greater detail and compared to the Proposed Project later in this Section under the "Project Impacts" subheading.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, the Proposed Project could have a potentially significant impact if it were to:

- a) Physically divide an established community;
- 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; or
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

As discussed in Section IV.A Impacts Found to be Less Than Significant and the Initial Study (see Appendix I-1 to this Draft EIR), the Proposed Project would have no impact with respect to Threshold c) listed above. No Further analysis of this topic is required.

City of Los Angeles CEQA Thresholds Guidelines

As set forth in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance levels of impacts of the Proposed Project related to land use consistency are determined on a case-by-case basis considering the following factors:

- a) Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site;

Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;

The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;

The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; or

The number, degree, and type of secondary impacts on surrounding land uses that could result from implementation of the Proposed Project.

As set forth in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance levels of impacts of the Proposed Project related to land use compatibility are determined on a case-by-case basis considering the following factors:

- a) The extent of the area that would be impacted, the nature and degree of impacts and the type of land uses within the area;
- b) The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated and the duration of the disruptions; and
- c) The number, degree and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

B. Project Impacts

i) Project Characteristics

As previously discussed, the Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site. Following the lot split, the existing surface parking lot would be demolished, allowing for the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to the existing five-level parking structure.

The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

The current zoning across a portion of the Proposed Project Site is not consistent with the proposed use. In order to allow for the Proposed Project, the Project Applicant, along with the request for the granting of a lot split, will seek a zone change to convert the approximately 118,596 sf portion of the parcel which contains a portion of the surface parking lot and the parking structure, from QPB-2 zoning to

(Q)C4-2 zoning (refer to Figure II-5, Proposed Zone Change Map). This change will result in the entire Museum Square site being singularly zoned for commercial use.

1) Design and Architectural Features

The proposed new Museum Square Office Building would be designed in a modern vernacular. The new building would be visible from Hancock Park and the LACMA campus and from distant vistas driving east on 6th Street and Wilshire Boulevard. The glass façade of the new building integrates screening as an element to soften the building face while offering privacy that will benefit both the neighboring residential units and the office tenants. The placement of the new office building would also screen the parking structure from direct view from the LACMA campus/Hancock Park. The service storage and access will be located to the north side of the building, keeping the lobby and the main entrance separate from the back of house functions. An approximately 68 foot setback on the northern property line and landscaping would serve to provide further privacy enhancement to residents of the Museum Terrace apartment building and to pull the park edge into the Museum Square ground plane (refer to Figures II-6 through II-10).

The Proposed Project would provide public amenities such as street trees, tree well covers, a landscaped plaza possibly including a water feature, outdoor seating, bike racks, and trash receptacles. Furthermore, the Proposed Project would include an enhanced open air entry drive and courtyard with a dedicated office drop off area, upgraded lighting and well lit pedestrian pathway garden/green buffer between the residential complex and the new office green wall designed to enhance the parking façade. The Proposed Project would also incorporate water quality features, which includes a storm water quality treatment system designed to treat roof water.

2) Parking and Access

Access for pedestrians would be from Wilshire Boulevard and Curson Avenue, with vehicle access to the parking structure, for both tenants and visitors, provided along Curson Avenue and Masselin Avenue. Entries and exits from Curson Avenue will be indicated by formal tree canopies marking a clear vehicular circulation path. An additional service lane will be added to the north vehicular entry from Curson Avenue for easy access to the service entry and to ensure adequate ingress and egress for building patrons.

The Applicant will be requesting a variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required for auditorium space. The auditorium is not utilized on a regular basis, but rather is used intermittently and generally at off-peak hours, such that more parking is currently required than needed and more than sufficient parking exists for use on these occasions.

ii) Requested Discretionary Applications or Actions

The City of Los Angeles Planning Department is the lead agency for the Proposed Project. In order to permit development of the Proposed Project, the City may require approval of one or more of the following discretionary actions:

- A Lot Split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development and parking structure), to create a separate, financeable parcel under the new building;

- A Zone Change to convert the approximately 118,596 sf portion of the parcel which contains a portion of the surface parking lot and the parking structure (the Proposed Project Site), from QPB-2 zoning to (Q)C4-2 zoning;
- A Conditional Use Permit to allow floor area ratio averaging for a unified commercial development in a C zone, which is requested in conjunction with the subdivision of the current parcel into two parcels.
- A Variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required for auditorium space;
- Removal of the current 15' building line setback in connection with the Zone Change and needed for the Project to be properly situated on the Site and consistent with the Miracle Mile CDO, which was adopted subsequent to the 15' building line setback, and requires that buildings be built "to the street" (note: a two foot irrevocable right of way easement was dedicated and recorded April 1997);
- Green Building Program Applications; and
- Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate, in order to execute and implement the Proposed Project. Such approvals may include, but are not limited to: architectural design, landscaping, lighting and signage in accordance with the City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Transportation permits for driveways/curb cuts; storm water discharge permit; issuance of permits from the City of Los Angeles Department of Building and Safety that may include permit approvals for demolition and grading, approval of the haul route for the export of demolition debris, approvals for foundations, and structural improvements; building permits; installation and hookup approvals for public utilities and related permits. Additional discretionary or ministerial action may include sewer and water hook-up permits from the City of Los Angeles Department of Water and Power and a Site Plan review by Department of City Planning.

iii) Community Division

1) Land Use Compatibility

The Project would not physically divide an established community because it is being built on a site that has already been developed with commercial uses within an established community. No existing streets will be eliminated and no existing residents will be dislocated. Therefore neither the physical characteristics of the Project or the physical impacts of the Project will physically divide or isolate portions of the established community.

The *L.A. CEQA Thresholds Guide 2006* addresses land use compatibility as it relates to assessing impacts on surrounding land uses. Evaluating the significance of environmental impacts, i.e., physical impacts and changes to the environment, related to compatibility requires more than merely comparing the physical attributes of the proposed building to the physical attributes of buildings adjacent to the Project Site and in the surrounding area. A significant impact is not generated simply because a proposed building is different than some of the buildings or even many of the buildings in the surrounding area. For purposes of evaluating environmental impacts related to compatibility, it is useful to address the

functional compatibility of the Proposed Project with its surrounding land uses. Functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a Proposed Project hinders the functional patterns of use and relationships associated with existing land uses. Patterns of use relate to the interaction and movement of people, goods, and/or information.

The physical compatibility of the Proposed Project with its environs is based on an analysis of proposed uses and improvements and their potential on-site and off-site impacts on traffic, noise, air quality, and aesthetics. These impacts, together with proposed mitigation measures, where applicable, are discussed in their respective sections of this EIR. As such, this section focuses on the compatibility of the Proposed Project from a functional perspective.

The Project Site is located in the Miracle Mile community, which is generally characterized by a mix of residential, commercial, and institutional uses. The area surrounding the Project Site is developed with commercial office uses of varying sizes and uses, institutional uses, retail uses, multi-family residential uses, parking structures and surface parking areas. As the uses proposed by the Project, which are commercial in nature, are similar to those mentioned above, the Proposed Project would be functionally compatible with the types of uses surrounding the Project Site.

The building heights and massing that would be developed with the implementation of the Proposed Project would create a change in the visual character of the Project Site from what currently exists. The Proposed Project would provide a visual contrast to the surface parking lot currently on the Project Site. However, it would be similar in design and use to many of the surrounding commercial uses. As the Proposed Project would include similar uses to those of the surrounding area and be consistent with the design of surrounding development, no significant impacts would result from the Proposed Project with regard to land use functional compatibility.

iv) Consistency with SB 375

The Proposed Project is consistent with the mandate of SB 375. The Miracle Mile community is currently served by Metro buses and the LADOT DASH Fairfax service. The nearest Metro rail line (Purple Line) Station to the Project Site is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Project Site. Work to bring the Metro Purple Line to the Westside of the City of Los Angeles is moving forward, with plans approved to add nine miles of subway. New Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue and Wilshire Boulevard and Fairfax Avenue. Local bus routes serving the area include Metro Local Lines 20, 212/312, and 217 and Metro Rapid Lines 720 and 780. The City provides the Fairfax DASH shuttle service, which loops between the Hancock Park/Miracle Mile area to the Cedars-Sinai Medical Center and generally runs along Wilshire Boulevard, Fairfax Avenue, Melrose Avenue and La Cienega Boulevard. Additionally, the Wilshire Bus Rapid Transit (BRT) Project, which is scheduled for completion in November 2014, will convert the existing curb lane along Wilshire Boulevard to bus and right-turn-only operation during the weekday AM and PM peak periods throughout the area, will improve area transit services and bus travel times by an estimated 24%. The Proposed Project is proximate to a variety of shops and services for employees (e.g., food services) that would further reduce vehicle miles travelled and associated GHG emissions. The Proposed Project would also incorporate pedestrian improvements and amenities for bicycles, to encourage users of the site to arrive on foot or bicycle.

The location of the Project Site in an existing urban center also reduces the need for new infrastructure. As discussed previously, the Project Site is well-served by public transit, which reduces the need for construction of new roads and transportation infrastructure. Other new infrastructure needs are also lessened by the availability of existing infrastructure at the site.

v) Consistency with Land Use Plans

As previously discussed, the development of the Proposed Project would be subject to numerous City land use plans as well as the development regulations in the LAMC. The Proposed Project's consistency with the policies and goals of applicable land use plans and policy documents, including the General Plan, the Community Plan, the LAMC, the Redevelopment Plan, Miracle Mile Community Design Overlay (CDO), and SCAG's RCP, are described in detail in this Section. The Project Site is also part of the Los Angeles State Enterprise Zone and is recommended to meet the goals of the Walkability Checklist. These are also analyzed later in this Section. As required by CEQA, the Proposed Project's consistency with the AQMP is addressed in Section IV.C (Air Quality), and the Proposed Project's consistency with the CMP is addressed in Section IV.I (Traffic/Transportation) of this EIR.

2) 2008 Regional Comprehensive Plan

The Proposed Project would conform to the goals set forth in the RCP, including those goals related to regional growth, mobility, and sustainability as shown in Table IV.G-1 (Project Consistency with Applicable Regional Comprehensive Plan Objectives).

**Table IV.G-1
Project Consistency with the Applicable Regional Comprehensive Plan Objectives**

Objective	Project Consistency
Successfully integrate land and transportation planning and achieve land use and housing sustainability.	Consistent: The Proposed Project supports the 2008 RCP goals by locating the Proposed Project's growth within a regional transportation hub and in proximity to a jobs rich area (see Section IV.C [Air Quality], subheading AQMP Consistency), thus minimizing urban sprawl, associated automobile trip emissions, and demand on local infrastructure. Furthermore, the Project Site is located in proximity to existing public transit opportunities provided by Metro and LADOT DASH, which serve the immediate project vicinity. Therefore, the Proposed Project would be consistent with this objective.
Develop sufficient water supplies through environmentally sustainable imports, local conservation, conjunctive use, reclamation, and reuse.	Consistent: According to LADWP, the Proposed Project's demand for domestic water associated with the Proposed Project could be accommodated by existing water supplies (see Section IV.A Impacts Found to be Less Than Significant [Utilities - Water]). Furthermore, as the Proposed Project would be consistent with the land uses and density provided within the City's land use regulations, the Proposed Project's water supply needs have already been accommodated within water supply projections for the region. In addition, while building plans are still in the preliminary phase, the Proposed Project would be designed to meet all provisions of CALGreen, the LA Green Building Code and the LEED Green Building Rating System, which would further

**Table IV.G-1
Project Consistency with the Applicable Regional Comprehensive Plan Objectives**

Objective	Project Consistency
	reduce potential impacts on water supplies. Therefore, the Proposed Project would be consistent with this objective.
Foster comprehensive and collaborative watershed planning within the region that produces water wise programs and projects.	Consistent: The Proposed Project would incorporate the use of existing and planned stormwater catchment systems and would direct stormwater in a manner that would not result in substantial erosion or flooding within the Project Site or off-site locations. In addition, new storm drains would be designed and sized using the Los Angeles County Hydrology Manual method for a minimum 50-year-frequency storm event capacity. Therefore, the Proposed Project would be consistent with this objective.
Reduce our region’s consumption of non-renewable energy.	Consistent: The Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section II, Project Description, Green Building and Sustainability). More specifically, the Proposed Project is pursuing LEED compliance from the USGBC for its efforts toward an energy efficient, sustainable, and environmentally-friendly design and the building will be designed and constructed in conformance with CALGreen and the LA Green Building Code mandatory measures. The sustainable design features may include, but is not limited to: <ul style="list-style-type: none"> • Recycling of asphalt, concrete and cardboard waste generated during demolition and construction; • Installation of a “cool white roof” that reflects the sun’s heat and reduces urban heat island effect; • Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible; • Use of locally (within 500 miles) manufactured construction materials, where possible; • Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills; • Use of energy efficient lighting; • Use of Energy Star appliances for office equipment; • Use of high energy efficiency rooftop heating and conditioning systems; • Use of ultra-low-flow toilets and low-flow metered hand-wash faucets; • Use of smart irrigation systems to avoid over-watering of landscape;

**Table IV.G-1
Project Consistency with the Applicable Regional Comprehensive Plan Objectives**

Objective	Project Consistency
	<ul style="list-style-type: none"> • Use of indigenous and/or water-appropriate plants in landscaping; and • Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to sewer systems. <p>Therefore, the Proposed Project would be consistent with this objective.</p>
Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.	Consistent: As discussed in Section IV.C (Air Quality), the Proposed Project would comply with all relevant air quality standards set forth in the AQMP. Therefore, the Proposed Project would be consistent with this objective.
Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.	Consistent: The Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section II, Project Description, Green Building and Sustainability). In addition, while building plans are still in the preliminary phase, the Proposed Project would be designed to meet all provisions of CALGreen, the LA Green Building Code and the LEED Green Building Rating System, which would further reduce potential impacts on energy, water supply, and other resource areas. Therefore, the Proposed Project would be consistent with this objective.
Minimize land uses that increase risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM ₁₀ , PM _{2.5} , ultrafine), and carbon monoxide.	Consistent: As discussed in Section IV.C (Air Quality), the Proposed Project would comply with all relevant air quality standards set forth in the AQMP. Therefore, the Proposed Project would be consistent with this objective.
Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.	Consistent: The Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section II, Project Description, Green Building and Sustainability). In addition, while building plans are still in the preliminary phase, the Proposed Project would be designed to meet all provisions of CALGreen, the LA Green Building Code and the LEED Green Building Rating System, which would further serve to reduce energy-related emissions from developments to increase economic benefits to business and residents. Therefore, the Proposed Project would be consistent with this objective.

Source: Southern California Association of Governments, Final 2008 Regional Comprehensive Plan, October 2008; EcoTierra Consulting, 2013.

Accordingly, the Proposed Project would be consistent with the 2008 RCP Goals and related land use impacts would be less than significant.

3) Southern California Compass Blueprint Growth Vision

The four main principles of the Compass Growth Vision are applicable to the Proposed Project.

a) Improve Mobility For All Residents

The Proposed Project would be consistent with the Compass Growth Vision goal to improve mobility for all residents. As an infill development, the Proposed Project's location two blocks east of the planned Wilshire Fairfax Metro Purple Line station and in an area served by several Metro bus lines and DASH lines, facilitates access for future employees and visitors to the Project Site, and with the local availability of retail, restaurant, and other amenities for employees, and visitors, the Proposed Project would reduce vehicle trips, vehicle miles traveled (VMT), and related emissions. Furthermore, the Proposed Project would incorporate urban design elements, such as a possible water feature and streetscape improvements that would provide for attractive street frontages to promote use by pedestrians. In addition, appropriate access and circulation improvements on-site would be implemented to accommodate Project traffic and increase site mobility. The entrances to the parking area would be located to allow continued traffic flow along streets and driveways would provide sufficient reservoir area to minimize in-street queuing. In addition, the Proposed Project would provide efficient access to the surrounding street system, while minimizing traffic impacts on surrounding uses. The Proposed Project would therefore be consistent with the Compass Growth Vision principle to improve mobility for all residents.

b) Foster Livability In All Communities

The Proposed Project would create a pedestrian-friendly, commercial development, expanding on the existing Museum Square complex's commercial office and retail/restaurant uses. The Proposed Project's landscaping would promote pedestrian activity and interaction among existing residents in the area, employees, and visitors. Moreover, the Proposed Project would provide new employment opportunities for residents within the community, which are presently served by traveling outside the community. The Proposed Project would be consistent with the Compass Growth Vision principle to foster livability in all communities.

c) Enable Prosperity For All People

This objective is primarily an economic objective, not directly related to environmental impacts. Nevertheless, the commercial office uses would provide a variety of skilled and unskilled jobs, both high-wage and entry-level employment opportunities and career growth opportunities with potential benefits for the regional economy. The Proposed Project would provide a substantial amount of employment opportunities, and thus, would be consistent with the Compass Growth Vision principle to enable prosperity for all people.

d) Promote Sustainability For Future Generations

The Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor

environmental quality. More specifically, the Proposed Project is pursuing compliance from the USGBC for its efforts toward an energy- efficient, sustainable, and environmentally-friendly design and all buildings would be designed and constructed in conformance with CALGreen and the LA Green Building Code mandatory measures. Sustainable design features may include, but are not limited to:

- Recycling of asphalt, concrete and cardboard waste generated during demolition and construction;
- Installation of a “cool roof” that reflects the sun’s heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Use of energy efficient lighting;
- Use of Energy Star appliances for office equipment;
- Use of high energy efficiency rooftop heating and conditioning systems;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to sewer systems.

The Proposed Project would utilize development methods and incorporate project design features to increase the energy and resource efficiency of proposed development and would also consider applicable “best practices” measures regarding energy, water, materials, and resource efficiency, as part of the development process. In addition, the Proposed Project would promote pedestrian activity and public transit use thereby reducing vehicle miles traveled and consumption of resource. As such, the Proposed Project would be consistent with the Compass Growth Vision principle to promote sustainability for future generations.

In conclusion, by maximizing development potential of an infill site within walking distance to a planned Metro Purple Line station, and including pedestrian improvements and other amenities for future employees and visitors, the Proposed Project would reduce vehicle trips, VMT, and related emissions. Furthermore, the Proposed Project would incorporate energy conservation approaches throughout the Project Site through implementation of project design features that encourage pedestrian access and energy efficiency. Therefore, the Proposed Project would be consistent with the principles of the Compass Growth Vision. Accordingly, potential land use impacts relative to the principles of SCAG’s Compass Growth Vision would be less than significant.

4) Regional Transportation Plan

As shown in Table IV.G-2 (Consistency of the Proposed Project with the Applicable Goals of Regional Transportation Plan), the Proposed Project would conform to the goals identified in the RTP.

**Table IV.G-2
Consistency of the Proposed Project with the
Applicable Goals of the 2012-2035 RTP/SCS**

Goal	Project Consistency
Maximize mobility and accessibility of all people and goods in the region.	Consistent: The Proposed Project supports the RTP goal by locating the Proposed Project within close proximity of a regional transportation hub and within a jobs rich area (see Section IV.C [Air Quality], subheading AQMP Consistency). Furthermore, the Project Site is located in proximity to existing public transit opportunities provided by Metro and DASH, which serve the Project Site. Therefore, the Proposed Project would be consistent with this goal.
Ensure travel safety and reliability for all people and goods in the region.	Consistent: The Project Site is located in proximity to existing public transit opportunities provided by Metro and DASH, which serve provide safe and reliable travel options for people and goods within the project area. Therefore, the Proposed Project would be consistent with this goal.
Preserve and ensure a sustainable regional transportation system.	Consistent: The Proposed Project supports the RTP goal by being located within proximity to existing public transit opportunities provided by Metro and DASH. Therefore, the Proposed Project would be consistent with this goal.
Maximize the productivity of our transportation system.	Consistent: The Proposed Project would provide infill development in an urbanized area at a greater density than what currently exists on the site that would provide accessible to the regional bus and rail transit systems. The Proposed Project would concentrate new development and jobs at a site within walking distance to the planned Metro Rail Purple Line Wilshire/Fairfax station and served by several Metro bus lines and DASH service, thus providing opportunities for employees to use public transit for work trips, and walk to restaurants and shops within and adjacent to the Proposed Project Site. Therefore, the Proposed Project would be consistent with this goal.
Protect the environment and health of our residents by improving air quality, and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent: The Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section II, Project Description, Green Building and Sustainability). The Proposed Project would be designed to meet USGBC LEED compliance and the building would be designed and constructed in conformance with CALGreen and the LA Green Building Code mandatory measures. In addition, the project's convenient location to bus and rail transit, and pedestrian-friendly design and provision for bicycle

**Table IV.G-2
Consistency of the Proposed Project with the
Applicable Goals of the 2012-2035 RTP/SCS**

Goal	Project Consistency
	racks, would provide alternate means of access to the project, primarily by employees but also to a lesser extent by visitors, which would reduce automobile trips and associated emissions, thereby improving air quality and promoting active transportation modes. Therefore, the Proposed Project would be consistent with this goal.
Actively encourage and create incentives for energy efficiency, where possible.	Consistent: The Proposed Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality (refer to Section II, Project Description, Green Building and Sustainability). The Proposed Project would be designed to meet USGBC LEED compliance and the building would be designed and constructed in conformance with CALGreen and the LA Green Building Code mandatory measures. In addition, the project’s convenient location to bus and rail transit and pedestrian-friendly design, would provide alternate means of access to the project, primarily by employees but also to a lesser extent by visitors, which would reduce automobile trips and associated emissions, thereby improving air quality. Therefore, the Proposed Project would be consistent with this goal.
Encourage land use and growth patterns that complement our transportation investments.	Consistent: The Proposed Project would provide infill development in an urbanized area at a greater density than what currently exists on the site that would provide jobs accessible to the regional bus and rail transit systems. The Proposed Project would concentrate new development and jobs at a site within walking distance to the planned Metro Rail Purple Line Wilshire/Fairfax station and served by several Metro bus lines and DASH service, thus providing opportunities for employees to use public transit for work trips, and walk to restaurants and shops adjacent to the Proposed Project. Therefore, the Proposed Project would be consistent with this goal.
Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Consistent: The Proposed Project would comply with <i>The Design Out Crime Guidelines: Crime Prevention Through Environmental Design</i> , published by the LAPD. The Proposed Project would develop a comprehensive security plan, which would include site security personnel, CCTV, secured access, and other security measures to reduce potential demand on police services and assist with rapid recovery planning. Therefore, the Proposed Project would be consistent with this goal.
<i>Source: Southern California Association of Governments, 2012-2035 RTP/SCS, April 2012; EcoTierra Consulting, 2013.</i>	

Therefore, the impacts of the Proposed Project’s land uses would be less than significant as related to the RTP.

5) City of Los Angeles General Plan Framework Element

As shown in Table IV.G-3 (Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element), the Proposed Project would conform to the objectives and policies identified in the various Elements of the General Plan. Therefore, the impacts of the Proposed Project’s land uses would be less than significant as related to the General Plan.

**Table IV.G-3
Consistency of the Proposed Project with the
Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element***

Objectives/Policies	Evaluation of Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors.	Consistent. The Proposed Project would develop new commercial uses, which would contribute to the diversity of uses in the Miracle Mile area, which currently includes commercial, residential, retail, restaurant, and institutional uses. Therefore, the Proposed Project would be consistent with this objective.
Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	Consistent. The Project Site is identified as a Regional Center on the Framework’s Long-Range Land Use Diagram (Metro). Development of commercial uses would serve the needs of existing and possible future residents in the area and would expand the diversity of uses within this Regional Center. The Proposed Project would increase the vitality in the area through maximizing development of an underutilized site with new commercial uses that would provide numerous job opportunities and support services. The concentration of development would support the project area’s existing range of services and commercial activities and would be consistent with the Regional Center designation. Therefore, the Proposed Project would be consistent with this policy.
Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Element Long-Range Land Use Diagram.	Consistent. The Proposed Project would be consistent with the Framework’s Long-Range Land Use Diagram (Metro), which identifies the Project Site as a Regional Center. The Regional Center is an area targeted for high-density, and a focal point of regional commerce, identity, and activity. Encouraged uses include corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. The Proposed

**Table IV.G-3
Consistency of the Proposed Project with the
Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element***

Objectives/Policies	Evaluation of Project Consistency
	Project, which would provide commercial uses, would be consistent with the Regional Center land use designation. Therefore, the Proposed Project would be consistent with this policy.
<p>Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p>Consistent: The Proposed Project would provide a new commercial building and jobs at a site adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the planned Metro Rail Purple Line Wilshire/Fairfax station, thus providing opportunities for employees, visitors, and local residents to use transit and reduced vehicle trips and VMTs. Therefore, the Proposed Project would be consistent with this objective.</p>
<p>Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City’s neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p>Consistent. The Proposed Project would provide new development that is consistent with existing uses in the Miracle Mile area, which currently includes commercial, residential, retail, restaurant, and institutional uses. The development of the Proposed Project within a Regional Center as well as on a primary transit corridor served by the Metro subway and bus service, DASH service, and freeways supports the Framework’s policies to encourage retail, commercial, and office uses along primary transit corridors. The Proposed Project would serve the City’s projected growth and demand, while conserving existing related districts since it would not encroach upon or cause the removal or relocation of uses in these districts. Therefore, the Proposed Project would be consistent with this objective.</p>
<p>Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.</p>	<p>Consistent. The Proposed Project would maximize the redevelopment potential with a commercial building reinforcing and enhancing the existing Regional Center, which currently accommodates a broad range of uses and job opportunities and attractions that are, and would continue to be, accessible to the region. The concentration of development adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the planned Metro Rail Purple Line Wilshire/Fairfax station would promote the use of public transit for employees and visitors to the Project Site. Furthermore, the Proposed Project would serve the adjacent community and has incorporated design features to encourage pedestrian activity, including landscaping and an attractive street frontage. Therefore, the Proposed</p>

**Table IV.G-3
Consistency of the Proposed Project with the
Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element***

Objectives/Policies	Evaluation of Project Consistency
	Project would be consistent with this objective.
Urban Form and Neighborhood Design Chapter	
<p>Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.</p>	<p>Consistent. The location of the Proposed Project adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the planned Metro Rail Purple Line Wilshire/Fairfax station would support the interconnection of diverse neighborhoods. The Regional Center is a multi-use center that encourages the development of a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. The Proposed Project supports the policy of creating a livable City for existing and possible future residents. By developing a commercial building on the Project Site, the Proposed Project would generate economic activity in the area and could help attract future investment to the area. Therefore, the Proposed Project would be consistent with this goal.</p>
<p>Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.</p>	<p>Consistent. The Proposed Project is located in a Regional Center in which activity is already concentrated and it is served by the Metro subway system and a regional and local bus system. The Proposed Project would support this objective by providing concentrated development and enhanced activity adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the Metro Rail Purple Line Wilshire/Fairfax station. Therefore, the Proposed Project would be consistent with this objective.</p>
<p>Policy 5.2.2: Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.</p>	<p>Consistent. The Proposed Project’s concentration of employment and commercial uses would be consistent with the existing surrounding land uses. The Proposed Project’s development of a commercial use with additional parking conforms since it would provide a commercial development on Curson Avenue, proximate to Wilshire Boulevard, which are considered a Collector street and Major Highway Class II, respectively. Project buildout would also be of a scale and built form consistent with the existing surrounding commercial uses. The uses would support transit use and support the function of the existing buildings on the Project Site. Therefore, the</p>

**Table IV.G-3
Consistency of the Proposed Project with the
Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element***

Objectives/Policies	Evaluation of Project Consistency
	Proposed Project would be consistent with this policy.
<p>Policy 5.2.2.c: The built form of regional centers will vary by location. In areas such as Wilshire and Hollywood Boulevards, buildings will range from low- to mid-rise buildings, with storefronts situated along pedestrian-oriented streets. In areas such as Century City and Warner Center, freestanding high rises that are not pedestrian-oriented characterize portions of these centers. Nevertheless, regional centers should contain pedestrian-oriented areas, and incorporate the pedestrian-oriented design elements.</p>	<p>Consistent. The 13-story commercial building would extend to a height approximately 207 feet above Curson Avenue and would share the immediate vicinity with the existing 11-story, approximately 180-foot tall Museum Square Office building complex¹⁵, which includes office, banking, concierge, conferencing facility, convenience store, dry cleaning and restaurant uses. Thus the Proposed Project is proximate to a variety of shops and services for employees (e.g., food services) that would encourage pedestrian, rather than vehicle, traffic. The Proposed Project has incorporated design features to encourage pedestrian activity, including landscaping, amenities for bicycles, and an attractive street frontage. Therefore, the Proposed Project would be consistent with this policy.</p>
Transportation Chapter	
<p>Goal A: Adequate accessibility to work opportunities and essential services, and acceptable levels of mobility for all those who live, work, travel, or move goods in Los Angeles.</p>	<p>Consistent. The location of the Project Site adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the planned Metro Rail Purple Line Wilshire/Fairfax station would provide adequate accessibility to work opportunities and acceptable levels of mobility. Furthermore, the development of the Proposed Project within a Regional Center as well as a primary transit corridor served by the Metro subway, Metro bus service, DASH service, and freeways supports meets this objective. Therefore, the Proposed Project would be consistent with this goal.</p>

¹⁵ Emporis Building Data, website: <http://www.emporis.com/building/museumsquare-losangeles-ca-usa>, accessed July 8, 2013.

**Table IV.G-3
Consistency of the Proposed Project with the
Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element***

Objectives/Policies	Evaluation of Project Consistency
<p>Objective 3: Support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plans.</p>	<p>Consistent. The Project Site is located within the Miracle Mile area, which is designated as a Regional Center in the Framework. The Proposed Project would be consistent with the Framework’s goal of targeting Regional Centers as high-density, and a focal point of regional commerce, identity, and activity by proposing the development a commercial oriented project. Therefore, the Proposed Project would be consistent with this objective.</p>
<p><i>* This table lists only those policies that are applicable to the Proposed Project.</i></p> <p>Source: The Citywide General Plan Framework Element, website: http://cityplanning.lacity.org/Framework.html, October 29, 2010; EcoTierra Consulting, 2013.</p>	

6) Wilshire Community Plan

a) Consistency with Community Plan Land Use Designation

The Community Plan is part of the Land Use Element of the Citywide General Plan, and sets forth specific land use requirements and required entitlements for projects in a specific community within the City. Both the General Plan Framework Element and the Community Plan Land Use Diagram designate the Miracle Mile as a Regional Commercial Center. Commercial land use describes the existing diversity of development in the Project vicinity, including mid to high rise office buildings, mid to low-rise apartments, entertainment centers, museums, and regional shopping complexes. Overall, the Proposed Project would be consistent with the Regional Commercial land use designation.

b) Consistency with Community Plan Objectives

As shown in Table IV.G-4 (Comparison of Wilshire Community Plan Objectives to Proposed Project Characteristics), the Proposed Project would implement a number of Community Plan policies, thereby assisting the City in meeting many of the Community Plan’s objectives.

**Table IV.G-4
Comparison of Wilshire Community Plan Objectives to Proposed Project Characteristics***

Objectives	Consistency of the Proposed Project
<p>Objective 2-1: Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.</p>	<p>Consistent. Development of the Proposed Project would support this objective by providing new commercial development within an existing commercial area. The Proposed Project would be consistent with this objective.</p>

**Table IV.G-4
Comparison of Wilshire Community Plan Objectives to Proposed Project Characteristics***

Objectives	Consistency of the Proposed Project
Objective 2-2: Promote distinctive commercial districts and pedestrian-oriented areas.	Consistent. Development of the Proposed Project would support this objective by providing new commercial development within an existing commercial area. Pedestrian use would be encouraged through the provision of public amenities such as street trees, tree well covers, a landscaped plaza possibly including a water feature, outdoor seating, bike racks, and trash receptacles. The Proposed Project would be consistent with this objective.
Objective 2-3: Enhance the visual appearance and appeal of commercial districts.	Consistent. The Proposed Project is designed in a modern vernacular, replacing a surface parking lot, and providing a more formalized backdrop to the seven-building LACMA campus and Hancock Park while enhancing the surrounding public spaces and concealing the parking garage within the existing Museum Square Office Building complex. Thus the proposed Museum Square Office Building would contribute to improving the visual quality along the Miracle Mile Corridor. Proposed Project would be consistent with this objective.
Objective 10-2: Increase work trips and non-work trips made on public transit.	Consistent. Development of the Proposed Project would support this objective by providing development and enhanced activity adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the planned Metro Rail Purple Line Wilshire/Fairfax station. The Proposed Project would be consistent with this objective.
Objective 12-1: Pursue Transportation Demand Management Strategies that maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.	Consistent: As discussed in Section IV.C (Traffic/Transportation) the Proposed Project will comply with the requirements of the City of Los Angeles TDM Ordinance (No. 167,700) as a non-residential development in excess of 100,000 gross square feet in size. Furthermore, the location of the Project Site adjacent to several Metro bus lines and within walking distance to LADOT Dash service and the planned Metro Rail Purple Line Wilshire/Fairfax station would provide adequate accessibility to work opportunities and acceptable levels of mobility. Therefore, the Proposed Project would be consistent with this objective.
Objective 15-1: Provide off-street parking in appropriate locations in accordance with Citywide standards and community needs.	Consistent. Development of the Proposed Project would support this objective with the addition of two new levels of parking (approximately 162,768 square feet) to an existing five-level parking structure. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces. Therefore, the Proposed Project would be consistent with this objective.
<p>* This table lists only those objectives that are applicable to the Proposed Project. Source: Wilshire Community Plan adopted September 19, 2001; EcoTierra Consulting, 2013.</p>	

7) Miracle Mile Community Design Overlay District

a) Land Use Designation

As previously discussed, Miracle Mile CDO is confined to commercially zoned properties only in the area generally bounded by Sycamore Avenue to the east, Fairfax to the west, 6th Street to the north and 8th street to the south. Consequently the Proposed Project is considered an allowed use per the Miracle Mile CDO.

b) Goals of the Miracle Mile CDO

The intent of the CDO is to provide guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity and promote the pedestrian environment of the District. Specifically, the goals of the CDO are:

- To promote development that preserves and enhances the physical appearance of the corridor and contributes to the District’s unique historical context.
- To encourage development that adds to a pedestrian friendly retail environment and contributes to the safety and comfort of both pedestrian and automobile traffic.
- To provide direction in site planning and insure a high degree of design quality in development of the Miracle Mile through the use of Design Guidelines and Standards.
- To preserve architecturally significant buildings in the Miracle Mile by providing direction of the responsible rehabilitation of these developments.

c) Development Standards and Design Guidelines

The Miracle Mile CDO sets forth various Development Standards and Design Guidelines; the Proposed Project’s consistency with the development standards and design guidelines of the Miracle Mile CDO is set forth in Table IV.G-5 (Miracle Mile Community Design Overlay District Consistency Analysis).

**Table IV.G-5
Miracle Mile Community Design Overlay District Consistency Analysis ***

Development Standard/Design Guideline	Consistency With Proposed Project
Site Planning	
<p>Guideline 2: Provide easy sidewalk access to pedestrians by locating vehicle access and loading areas where there will be minimal physical or visual impact on pedestrians, the flow of traffic, and/or adjacent uses.</p>	<p>Consistent. The lobby of the Museum Square Office Building (MSOB) is designed to facilitate the multiple entry points of the pedestrian experience. The main entry will be located on the northeastern corner of the building. The Proposed Project will provide an enhanced open air entry drive and courtyard for a dedicated office drop off area. Vehicular entries and exits would be marked by formal tree canopies indicating a clear vehicular circulation path, separate from the pedestrian pathways. Therefore, the Proposed Project would be consistent with these guidelines.</p>

**Table IV.G-5
Miracle Mile Community Design Overlay District Consistency Analysis ***

Development Standard/Design Guideline	Consistency With Proposed Project
Guideline 3: Locate utilities, storage areas, mechanical equipment, fire alarms, sprinklers and other service areas so that they are not visible from the public right-of-way.	Consistent. The MSOB would locate storage and access on the north side of the building, keeping the lobby and the main entrance separate from the back of house functions. An additional service lane will be added to the north vehicular entry for easy access to the service entry to ensure ingress and egress flows seamlessly. Mechanical, life safety, and irrigation equipment will be screened from public view. Therefore, the Proposed Project would be consistent with these guidelines.
Architecture	
Guideline 1: Reduce the monotony of large buildings by breaking architectural elements into smaller pedestrian scale components or through use of varied materials, textures or colors, trim, roof lines, canopies and awnings in order to provide variation and visual interest.	Consistent. The MSOB would employ varying building materials such as concrete, steel, glazing, metal panels, and other such contemporary materials to break-up the façade and provide consistency with recent contemporary development that has occurred near the Project Site. The MSOB building features floating orthogonal volumes that articulate the office space along its frontage on Curson Avenue to provide variation and visual interest. Therefore, the Proposed Project would be consistent with these guidelines.
Guideline 2: Maintain building openings that enhance building design and continuity, as well as the pedestrian experience.	Consistent. The lobby of the MSOB is designed to facilitate the multiple entry points of the pedestrian experience. The main entry will be located on the northeastern corner of the building. The Proposed Project would provide public amenities such as street trees, tree well covers, a landscaped plaza possibly including a water feature, outdoor seating, bike racks, and trash receptacles. Therefore, the Proposed Project would be consistent with these guidelines.
Guideline 4: Design new buildings to achieve consistency by creating continuity between the heights of adjacent roofs, parapets, and cornices.	Generally Consistent. The MSOB building features a rooftop viewing deck with an articulated shade structure, complementing the roofline of the existing Museum Square office tower. Therefore, the Proposed Project would be generally consistent with these guidelines.
Guideline 5: Select building materials to reduce building mass, create visual interest, and complement the existing historic resources of the Miracle Mile.	Consistent. The MSOB would employ varying building materials such as concrete, steel, glazing, metal panels, and other such contemporary materials to break-up the façade and provide consistency with recent contemporary development that has occurred near the Project site. The MSOB building features floating orthogonal volumes that articulate the office space along its frontage on Curson Avenue to provide variation and visual interest. Therefore, the Proposed Project would be consistent with these guidelines.

**Table IV.G-5
Miracle Mile Community Design Overlay District Consistency Analysis ***

Development Standard/Design Guideline	Consistency With Proposed Project
<p>Guideline 6: Add visual interest and create a feeling of openness by incorporating windows with architectural defining features such as window frames, sashes, muntins, glazing, paneled or decorated jambs and moldings.</p>	<p>Consistent. The MSOB would employ varying building materials such as concrete, steel, glazing, metal panels, and other such contemporary materials to break-up the façade and provide consistency with recent contemporary development that has occurred near the Project Site. The MSOB building features floating orthogonal volumes that articulate the office space along its frontage on Curson Avenue to provide variation and visual interest. Therefore, the Proposed Project would be consistent with these guidelines.</p>
<p>Guideline 8: Use a color palette which complements adjacent buildings and promotes the Art Deco identity of the Miracle Mile.</p>	<p>Consistent. The MSOB would utilize a muted color palette which would harmonize with the adjacent commercial and residential buildings. Therefore, the Proposed Project would be consistent with these guidelines.</p>
<p>Guideline 10: Incorporate lighting into the design not only to accentuate architectural features, but to provide a safe environment for pedestrian activity.</p>	<p>Consistent. The Proposed Project would include upgraded exterior lighting and well lit pedestrian pathways for both way-finding and security. All Project lighting will be shielded to prevent glare to adjacent properties. Therefore, the Proposed Project would be consistent with these guidelines.</p>
<p>Guideline 11: Screen or enclose existing utilities, storage areas, mechanical equipment, fire alarms, sprinklers and other service areas with attractive landscaping or architectural barriers.</p>	<p>Consistent. The MSOB would locate storage and service access on the north side of the building, keeping the lobby and the main entrance separate from the back of house functions. An additional service lane will be added to the north vehicular entry for easy access to the service entry to ensure ingress and egress flows seamlessly. Mechanical, life safety, and irrigation equipment will be screened from public view. Therefore, the Proposed Project would be consistent with these guidelines.</p>
Parking	
<p>Guideline 2: Integrate a parking structure into the overall design of a development through compatible materials, color and architectural defining features.</p>	<p>Consistent. The Proposed Project would add two new levels to the existing parking structure, featuring enhanced landscaping, i.e., a ‘green wall’ design, to enhance the structure’s façade. Therefore, the Proposed Project would be consistent with these guidelines.</p>
Landscaping	
<p>Guideline 1: Buffer existing parking adjacent to a public right-of-way as well as residential buildings with a landscaped barrier.</p>	<p>Consistent. The Proposed Project would feature a generous landscaped setback on the northern property line. Vehicular entries and exits would be marked by formal tree canopies indicating a clear vehicular circulation path. Therefore, the Proposed Project would be consistent with these guidelines.</p>

**Table IV.G-5
Miracle Mile Community Design Overlay District Consistency Analysis ***

Development Standard/Design Guideline	Consistency With Proposed Project
Guideline 2: Landscape the areas surrounding a building including site entrances, walkways and parking lots with small trees, planter boxes and tubs of flowers.	Consistent. The Proposed Project would feature a generous landscaped setback on the northern property line. Vehicular entries and exits would be marked by formal tree canopies indicating a clear vehicular circulation path. The Proposed Project would have a landscaped plaza possibly including a water feature, outdoor seating, bike racks, and trash receptacles. Therefore, the Proposed Project would be consistent with these guidelines.
Signage	
Guideline 1: Design signage which is incorporated into the overall design of a building and complements the facade or architectural element on which it is placed.	Consistent. The Proposed Project would feature monument signs of simple, contemporary design to provide identification and way-finding. Therefore, the Proposed Project would be consistent with these guidelines.
Guideline 2: Develop coordinated pedestrian signage, which complements the pedestrian orientation of the Miracle Mile.	Consistent. The Proposed Project would feature monument signs of simple, contemporary design to provide identification and way-finding. Therefore, the Proposed Project would be consistent with these guidelines.
Guideline 5: Signs which direct vehicular and pedestrian traffic to parking areas or other onsite destinations or explain parking fees should not exceed nine (9) square feet or a vertical or horizontal dimension of thirty-six (36) inches, and should be consistent in design with the signage for the rest of the project.	Consistent. The Proposed Project would provide way-finding signage in a manner consistent with the contemporary design vernacular of the Project and in compliance with the size requirements of the CDO Guidelines. Therefore, the Proposed Project would be consistent with these guidelines.
<p><i>* This table lists only those policies that are applicable to the Proposed Project. Source: Miracle Mile Community Design Overlay District - Development Standards and Design Guidelines, January 16, 2005; EcoTierra Consulting, 2013.</i></p>	

8) Consistency with City of Los Angeles Planning and Zoning Code Requirements

a) Permitted Uses

The Proposed Project includes a request for a zone change to convert the approximately 118,596 sf portion of the Museum Square Site, which contains a portion of the surface parking lot and the parking structure, from QPB-2 zoning to (Q)C4-2 zoning. The requested change is consistent with Wilshire Community Plan land use designation of Regional Center Commercial. A zone change to the C4 zone is necessary to construct the Proposed Project because the proposed office building and the addition of two levels of parking to the existing parking structure are not permitted with the existing QPB-2 zone.

In accordance with Sections 12.14 of the City of Los Angeles Planning and Zoning Code, the Proposed Project uses are permitted in and consistent with the C4 zone. C4 is a commercial zone, which allows for the construction of a variety of commercial uses, including retail stores, offices, restaurants, parking structures, as well as hotel and multi-family residential uses. The Proposed Project would include uses that are within these categories and would therefore be consistent with the C4 zoning designation.

b) Setback Requirements

Pursuant to LAMC Sections 12.14.C, front yard setbacks are not required for commercial uses within the C4 zone. Furthermore, side and rear yard setbacks are not required for buildings used exclusively for commercial purposes. The Proposed Project will be requesting the removal of the current 15' building line setback in connection with the Zone Change, which is needed for the Project to be properly situated on the Site and consistent with the Miracle Mile CDO, which was adopted subsequent to the 15' building line setback and requires that buildings be built "to the street" (note: a two foot irrevocable right of way easement was dedicated and recorded April 1997 – refer to Figure II-3).

c) Height District

The Project Site is located in Height District 2, which typically permits a maximum FAR of 6:1 with no height limit in the C4 zone. The full Museum Square Site is a rectangular shaped property that is approximately 7-1/2 acres (327,613 square feet). The existing Museum Square office complex is approximately 530,000 square feet. The Proposed Project would add an approximately 249,500 square-foot commercial office building.

The Proposed Project is requesting a Conditional Use Permit ("CUP") to allow floor area ratio averaging for a unified commercial development in a C zone, which is requested in conjunction with the subdivision of the current parcel into two parcels, as previously discussed.

With the granting of the CUP, the FAR for the full Museum Square Site, including the existing development and the Proposed Project would be 2.38:1, which falls within the allowable 6:1 FAR. Therefore, the Proposed Project would be consistent with the height district limitations.

d) Parking Requirements

Parking for the Proposed Project would be provided in a parking structure comprised of seven levels of parking (five levels in the existing structure plus the two new levels added under the Proposed Project). The required parking ratio of the LAMC is one parking space required for every 500 square feet of commercial office uses.¹⁶ The auditorium use within the existing Museum Square complex requires one parking space for every 35 square feet. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces. The Applicant is requesting a variance from Section 12.21 A.4(e) of the LAMC to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet. The auditorium is not utilized on a regular basis, but rather is used intermittently and generally at off-peak hours, such that more parking is currently required than needed; and more than sufficient parking exists for use during these occasions. With implementation of the requested parking variance, the Proposed Project would be consistent with the parking requirements of the LAMC.

e) Sign Regulations and Policies

The Proposed Project would incorporate project identity signs and address signs, which would be compliant with LAMC § 12.11.5-B.4 and § 14.4.4-E, as well as the Miracle Mile CDO Development Standards and Design Guidelines. No advertising signage is proposed to be included in the Project.

¹⁶ LAMC § 12.21.A.4.

Furthermore, all signage would be subject to review by the appropriate City entities. Therefore, the Proposed Project would have less than significant impacts with regards to signage regulations and policies.

f) CALGreen and LA Green Building Codes

The Proposed Project's proximity to public transportation and services would aid in reducing vehicle miles traveled for employees. The Museum Square site is currently served by Metro buses and the LADOT DASH Fairfax service. As previously discussed, the nearest Metro rail line (Purple Line) Station is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Museum Square site. Under the Purple Line Extension project's planned schedule for Section 1, two new Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue (approximately 0.7 mile (eight blocks, 3,696 feet) east of the Museum Square site) and Wilshire Boulevard and Fairfax Avenue (approximately 1/3 of a mile (one long block - 1,850 feet) west of the Museum Square site). Local bus routes serving this area include Metro Local Lines 20, 212/312, and 217 and Metro Rapid Lines 720 and 780. The City provides the Fairfax DASH shuttle service, which loops between the Hancock Park area to the Cedars-Sinai Medical Center and generally runs along Wilshire Boulevard, Fairfax Avenue, Melrose Avenue and La Cienega Boulevard. Additionally, the Wilshire Bus Rapid Transit (BRT) Project, which is scheduled for completion in November 2014, will convert the existing curb lane along Wilshire Boulevard to bus and right-turn-only operation during the weekday AM and PM peak periods throughout the area, which will improve area transit services and bus travel times by an estimated 24 percent. The Proposed Project is proximate to a variety of shops and services for employees (e.g., food services) that would further reduce the need for vehicle trips.

i. CALGreen Building Code

The 2013 California Green Building Standards Code, referred to as *CALGreen*, became effective on January 1, 2014. *CALGreen* sets minimum standards that all new structures can meet to minimize significantly the state's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new *CALGreen* standards. The *CALGreen* Standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

CALGreen requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. *CALGreen*'s mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs in a slow economy.

CALGreen also has more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two tiered system designed to allow jurisdictions to adopt codes that go beyond the state mandatory provisions. The nonresidential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for

clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

The code addresses the critical issue of compliance verification by utilizing the existing building code enforcement infrastructure. The mandatory CALGreen measures would be inspected and verified by local building departments, in this case the City of Los Angeles Department of Building and Safety, using special inspectors as they determine necessary.

ii. Los Angeles Green Building Code

As of January 3, 2014, the City of Los Angeles implemented Ordinance No. 182,849, the latest update to the Los Angeles Green Building Code (“LA Green Building Code”). The LA Green Building Code is based on the 2013 California Green Building Standards Code, commonly known as CALGreen as discussed above, that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use; reduce waste; and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over \$200,000 (residential and non-residential)

iii. United States Green Building Council

Projects have the option to meet the intent of the criteria of the United States Green Building Council’s (“USGBC”) Leadership in Energy and Environmental Design (“LEED”) rating system’s “certified” performance level. Developers are required to submit a LEED checklist, a signed declaration from a LEED accredited professional asserting that the Project would meet the intent of the LEED rating system’s “certified” level, and a set of plans that identifies the LEED measures.

While building plans are still in the preliminary phase, the Proposed Project would be designed to meet all provisions of CALGreen, the LA Green Building Code and LEED Green Building Rating System standards to reduce energy and water use, reduce waste, and reduce the carbon footprint.

Specific measures to be incorporated into the Proposed Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete and cardboard waste generated during demolition and construction;
- Installation of a “cool roof” that reflects the sun’s heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;

- Use of energy efficient lighting;
- Use of Energy Star appliances for office equipment;
- Use of high energy efficiency rooftop heating and conditioning systems;
- Use of ultra low-flow toilets and low-flow metered hand-wash faucets;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to sewer systems.

Therefore, the Proposed Project would be consistent with the requirements of the green building code.

9) City of Los Angeles Planning Department Walkability Checklist

While the guidance provided by the Walkability Checklist is not mandatory and is not a part of the LAMC, incorporating the criteria listed to the maximum extent feasible would create a more walkable environment and a higher quality of urban form for the Proposed Project. The essential purpose of the Walkability Checklist is to guide Department of City Planning staff in working with developers to make developments more “walkable” by way of enhancing pedestrian activity, access, comfort, and safety. In addition, the Walkability Checklist encourages planners and developers to protect neighborhood character and pursue high-quality urban form. The following is an analysis of the Proposed Project’s consistency with the applicable guidelines.

a) Building Orientation

The Proposed Project generally supports the walkability guidelines discussing building orientation, which describe that a building’s placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. Employees and visitors would be able to walk to restaurants and shops within and adjacent to the Project Site. The Proposed Project would provide a landscaped plaza possibly including a water feature, outdoor seating, bike racks, and trash receptacles to make it more inviting and walkable. Furthermore, the Proposed Project provides an unimpeded pedestrian access way along the Curson Avenue frontage. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to building orientation.

b) Building Frontage

The Proposed Project generally supports the walkability guidelines discussing building frontage, which describe that a building’s frontage could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. The Proposed Project would integrate a pedestrian scale design, including a variety of textures, materials, signage, and architectural features appropriate to the Project Site, thereby minimizing the effects of building mass and street walls in relation to street frontage. The Proposed Project would incorporate transparent building elements on the ground floor façade along Curson Avenue. In addition, substantial openings, open areas, glazed elements and windows have been incorporated on the upper levels of the Proposed Project. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to building frontage.

c) On-Site Landscaping

While building plans are still in the preliminary phase, the Proposed Project would be designed to generally support the walkability guidelines discussing on-site landscaping. The Proposed Project would contribute to the public realm because it would act as an extension of the public right-of-way for passers-by; thus creating the sense of an “outdoor room.” The Proposed Project would incorporate landscaping that would be designed to facilitate pedestrian movement where appropriate and used to provide separation between service areas and public zones, as well as to define edges throughout the varying elements of the Proposed Project. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to on-site landscaping.

d) Off-Street Parking and Driveways

The Proposed Project generally supports the walkability guidelines discussing off-street parking and driveways, which states that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated.

The Proposed Project will provide an enhanced open air entry drive and courtyard for a dedicated office drop off area. Vehicular entries and exits would be marked by formal tree canopies indicating a clear vehicular circulation path, separate from the pedestrian pathways.

Furthermore, pedestrian walkways from the parking structure and to the building entrances would be identifiable with the use of landscape and hardscape materials, lighting, and signage. The width of driveways would meet and not exceed the standard width identified as necessary to accommodate vehicles and all parking areas would be illuminated with adequate, uniform, and glare-free lighting. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to off-street parking and driveways.

e) Building Signage and Lighting

While building plans are still in the preliminary phase, the Proposed Project would be designed to generally support the walkability guidelines discussing building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and “place making”. Signage would be designed to be consistent with and complement the elements of the MSOB and its surrounding environment. Building lighting would be designed to supplement street lighting and help illuminate the sidewalk and pedestrian pathways. Furthermore, the Proposed Project would include pedestrian-scale way-finding signage and pedestrian-scale lighting to facilitate access to the building and parking structure and for safety and security purposes. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to building signage and lighting.

f) Sidewalks

The Proposed Project generally supports the walkability guidelines discussing sidewalks, which describes that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. The sidewalk along Curson Avenue would be maintained as a continuous, straight pathway, designed to be able to accommodate pedestrian flow and provide for pedestrian safety. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to sidewalks.

g) Utilities

The Proposed Project generally supports the walkability guidelines discussing utilities, which describe that ideally utilities should be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path. If new utility equipment is needed, the Proposed Project would place utility equipment underground and/or in the specified zones outlined in the Walkability Checklist. Therefore, the Proposed Project would be substantially consistent with Walkability Checklist guidelines related to utilities.

4. CUMULATIVE IMPACTS

Cumulative land use impacts could occur if other related projects in the vicinity of the Project Site would result in land use impacts in conjunction with the Proposed Project. A total of 46 proposed or approved projects were identified that could potentially contribute to the cumulative effects of the Proposed Project (as listed in Section III, Environmental Setting). Development of the Proposed Project, in conjunction with the related projects, would result in an intensification of existing prevailing land uses in the project vicinity. These projects would be subject to specific findings and conditions, which are based on maintaining general conformance with the land use plans applicable to the area. As such, development of the Proposed Project and related projects is not anticipated to substantially conflict with the intent of the City's General Plan regarding the future development of the Wilshire / Miracle Mile community, or with other land use regulations required to be consistent with the General Plan, such as the Planning and Zoning Code. Development of the Proposed Project, in conjunction with the identified related projects, would not be expected to result in cumulatively considerable effects with respect to land use regulations.

5. MITIGATION MEASURES

The Proposed Project would be consistent with applicable plans and policies as outlined in regulatory and guidance documents relevant to land use at the Project Site; no mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required and no significant land use compatibility or plan consistency impacts would result from the Proposed Project.

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. NOISE

1. INTRODUCTION

This section evaluates the potential for noise and groundborne vibration impacts resulting from implementation of the Proposed Project. This includes the potential for the Proposed Project to result in impacts associated with a substantial temporary and/or permanent increase in ambient noise levels in the vicinity of the Project Site; exposure of people in the vicinity of the Project Sites to excessive noise levels, groundborne vibration, or groundborne noise levels; and whether this exposure is in excess of standards established in the local general plan or noise ordinance. Finally, mitigation measures intended to reduce impacts to noise and vibration are proposed, where appropriate, to avoid or reduce significant impacts of the Proposed Project.

This section is based on the information provided in the Environmental Noise Impact Analysis for the Museum Square Office Building, by Cadence Environmental Consultants, dated October 2013 (Noise Report). The Noise Report, including all calculation data is incorporated herein by this reference, and provided in Appendix IV.H to this Draft EIR. Data used to prepare this analysis were obtained from the City of Los Angeles General Plan Noise Element, the City Municipal Code, and by measuring and modeling existing and future noise levels at the Project Site and the surrounding land uses. Traffic information contained in the traffic study prepared for the Proposed Project (included as Appendix IV.I-1 to this Draft EIR) was used to prepare the noise modeling for vehicular sources.

2. ENVIRONMENTAL SETTING

A. Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway. Table IV.H-1 (Representative Environmental Noise Levels), illustrates representative noise levels in the environment.

**Table IV.H-1
Representative Environmental Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet	105	
	—100—	
Gas Lawnmower at 3 feet	95	
	—90—	
	85	Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime	75	
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area	65	Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
	55	Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
	45	
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime	35	
	—30—	Library
Quiet Rural Area during Nighttime	25	Bedroom at Night, Concert Hall (background)
	—20—	
	15	Broadcast/Recording Studio
	—10—	
	5	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: California Department of Transportation, Technical Noise Supplement, October 1998.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq} , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA “weighting” during the hours of 7:00 PM to 10:00 PM and a 10 dBA “weighting” added to noise during the hours of 10:00 PM to 7:00 PM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45–60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

Generally, a difference of 3 dBA over 24 hours is a barely-perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors such as the weather and reflecting or shielding also intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA. Noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally 30 dBA or more.

B. Fundamentals of Environmental Groundborne Vibration

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby, creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as ground-borne vibration. Ground-borne vibration is measured as peak particle velocity (PPV) in inches per second. The general human response to different levels of ground-borne vibration velocity levels is described below in Table IV.H-2. Ground-borne vibration levels that could induce potential damage to buildings are identified in Table IV.H-3

Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible.

**Table IV.H-2
Human Response to Different Levels of Groundborne Vibration**

Human Reaction	Maximum PPV in Inches per Second	
	Transient Sources	Continuous / Frequent Intermittent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.1
Severe	2.0	0.4

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: California Department of Transportation, 2004.

**Table IV.H-3
Groundborne Vibration Damage Potential Criteria**

Structure and Condition	Maximum PPV in Inches per Second	
	Transient Sources	Continuous / Frequent Intermittent Sources
Extremely Fragile Historic Buildings, Ruins, Ancient Monuments	0.12	0.08
Fragile Buildings	0.2	0.1
Historic and Some Old Buildings	0.5	0.25
Older Residential Structures	0.5	0.3
New Residential Structures	1.0	0.5
Modern Industrial/Commercial Buildings	2.0	0.5

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: California Department of Transportation, 2004.

C. Existing Conditions

i) Existing Ambient Daytime Noise Levels

The Museum Square site is located on a heavily trafficked segment of Wilshire Boulevard in the Miracle Mile area of the City west of downtown Los Angeles and the Mid-City community. The land uses within the general vicinity of the Museum Square site are characterized by a mix of low- to high-intensity commercial, institutional and residential uses, which vary widely in building style and period of construction.

The Museum Square site is fully developed with an 11-story commercial office complex with an associated surface parking lot and parking structure. The existing building complex is located on the southern approximately one-half of the lot with a surface parking area and parking structure located on the northern half of the lot. The existing office building complex was originally constructed in 1948 as the Prudential Insurance Company Building. The existing parking structure was approved and constructed in 1983. The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot. The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building. Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story commercial office building and the addition of two new levels of parking to the existing five-level parking.

Across Wilshire Boulevard, south of the Museum Square site, is the Wilshire Courtyard complex (5700 and 5750 Wilshire Boulevard), comprised of two six-story commercial office buildings linked by a central drive and park-like open spaces.

Multi-family residential buildings sharing the block and to the immediate north of the Proposed Project Site are five-story Museum Terrace Apartments building (600 S. Curson Avenue) and the five-story Masselin Park West apartment building (5700 W. 6th Street). To the north of that, across W. 6th Street, is the 160 acre, Park La Brea residential development which includes 18 Art Deco style apartment towers, along with numerous Modern Colonial style low-rise townhouse and garden apartment buildings, providing over 4,000 residences and affiliated on-site amenities. Directly east of the Museum Square site (across Masselin Avenue) are a two-story commercial retail building housing an Office Depot store which fronts on Wilshire Boulevard and two five-story, multi-family residential developments; Renaissance Apartment Homes located at 630 Masselin Avenue and Tiffany Court Apartment Homes, located at 616 Masselin. West of the Proposed Project Site is Hancock Park, which includes the La Brea Tar Pits and the George C. Page Museum. Further to the west is the 20-acre, seven-building campus of the Los Angeles County Museum of Art (LACMA).

The primary sources of noise at the Museum Square site include traffic along Curson Avenue, traffic activities within the Museum Square site, human activity (e.g., children playing and talking loudly) at the Page Museum, Tar Pits and LACMA campus, landscape maintenance at the Museum Square site and adjacent properties, and occasional aircraft overflights.

Methodology

The analysis of the existing and future noise environments presented in this section is based on noise level measurements, noise prediction modeling, and empirical observations. Existing ambient noise levels were measured using a Larson•Davis Model 820 sound level meter, which meets and exceeds the minimum industry performance requirements for “Type 1” standard instruments as defined in the American National Standards Institute (ANSI) S1.4. The sound level meter was programmed to measure using the “A” weighting scale and the “fast” detector response as recommended by the California Department of Transportation (Caltrans). The sound level meter was calibrated immediately prior to the first measurement to a sound level of 114 dB with a Larson•Davis Precision Acoustic Calibrator Model CAL200 and checked again following the final measurement. Each event occurred over a period of 15 minutes and the traffic volumes along the adjacent roadway segments were counted during each measurement. The estimated 24-hour roadway noise levels at the measurement locations were then calculated using a spreadsheet noise model based upon the equations provided in the Caltrans Technical Noise Supplement (TeNS) document (2009) and traffic volumes provided in the Draft Traffic Impact Study for the Proposed Museum Square Office Building at 5757 Wilshire Boulevard, City of Los Angeles (March 2013).

Pursuant to the Caltrans TeNS noise measurement methodology, a noise level measurement representing a 1-hour period does not need to last the entire hour. As long as the noise levels do not change drastically, a shorter time period will usually be sufficient to represent the entire period of interest. When vehicular traffic is the primary source of noise being measured, the vehicle spacing and differences in vehicle types are responsible for fluctuating noise levels. Near the beginning of each measurement period, the average sound levels for a location will fluctuate considerably. However, after more data are collected, they tend to stabilize. The time necessary to stabilize depends on the amount of noise fluctuation and a measurement may be terminated when the average noise levels measurement displayed on the sound level meter has stabilized.

Monitoring Locations

To establish baseline noise conditions, existing daytime noise levels were measured at 10 locations on May 9, 2013. The measurement locations are illustrated in Figure IV.H-1 and each of these is described as follows:

Location 1 Northern property line of Proposed Project Site parking lot: The residential building nearest to the proposed office building is located to the immediate north of the Project Site. Noise levels were measured adjacent to the northern property line of the Project Site since ambient noise levels would be similar on the other side of the short fence at the adjacent multi-family residential property. The primary sources of noise at this location were traffic on Curson Avenue, an airplane overflight, construction activities within the residential building parking garage, people talking, and children playing near the Page Museum/Tar Pits area.

Location 2 Northern edge of parking structure near Masselin Park West apartments: The Masselin Park West apartment building is located to the immediate north of the existing Project Site parking structure. Noise levels were measured adjacent to the northern property line at the top level of the parking structure since ambient noise levels would be similar on the other side of the wall at the adjacent apartment building. The primary sources of noise at this location were general ambient traffic noise, children playing near the Page

Museum/Tar Pits area, landscape maintenance at a nearby residential location, and emergency vehicle sirens.

Location 3 6th Street west of Curson Avenue: Multi-family residential buildings are located along 6th Street west of Curson Avenue. Noise levels were measured at the edge of the public right-of-way in front of the residential unit at 5841 6th Street. The primary source of noise at this location was traffic on 6th Street. The secondary sources of noise were children playing near the Page Museum/Tar Pits area and a helicopter overflight. A total of 238 vehicles travelled along this segment of 6th Street during the 15-minute noise level measurement period.

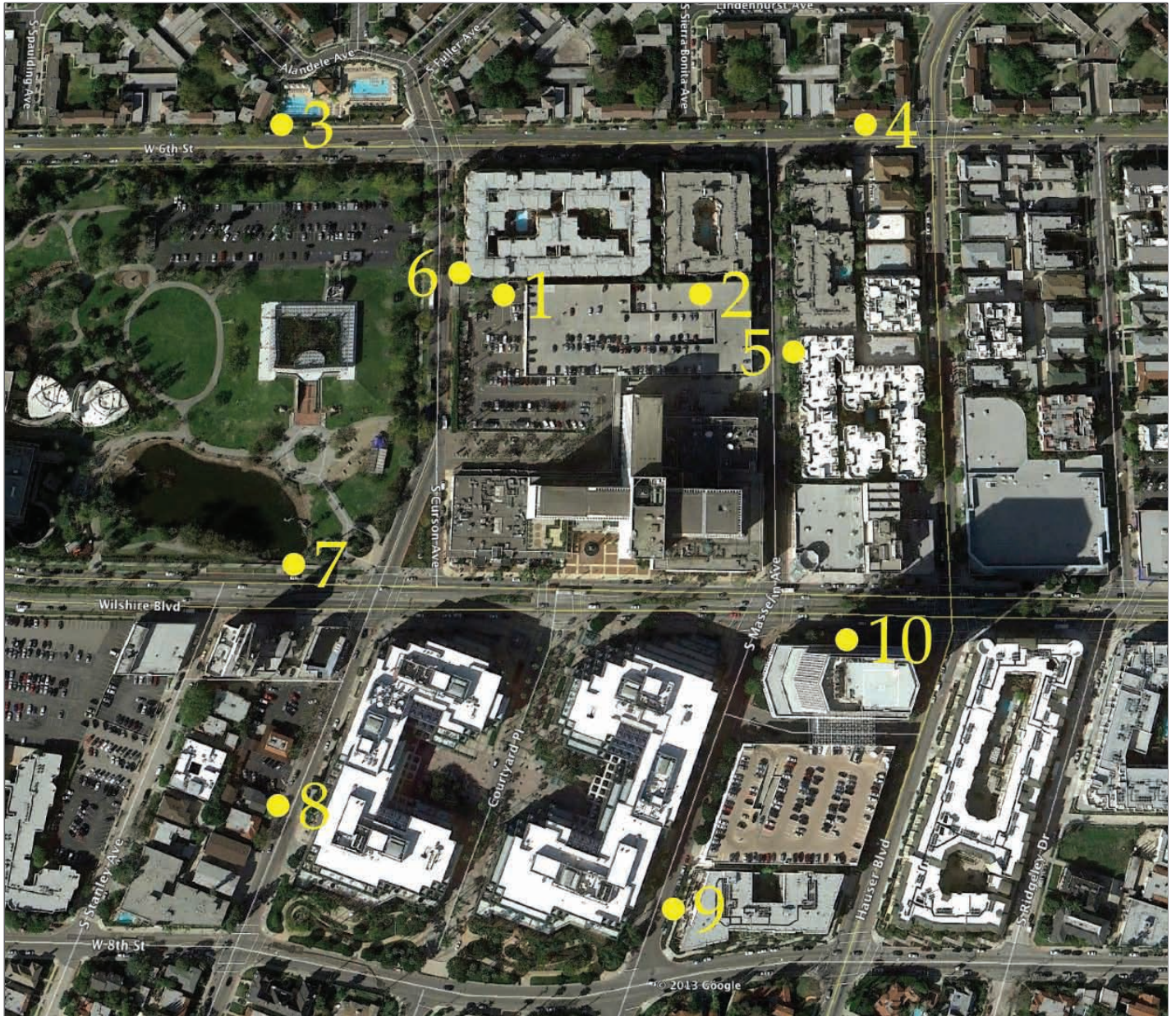
Location 4 6th Street west of Hauser Boulevard: Multi-family residential buildings are located along 6th Street west of Hauser Boulevard. Noise levels were measured at the edge of the public right-of-way in front of the residential unit at 5667 6th Street. The primary source of noise at this location was traffic on 6th Street. The secondary sources of noise were people talking and a carpet cleaning machine operating along Masselin Avenue. A total of 336 vehicles travelled along this segment of 6th Street during the 15-minute noise level measurement period.

Location 5 Masselin Avenue across from Project Site parking structure: Multi-family residential buildings are located along the eastern side of Masselin Avenue between Wilshire Boulevard and 6th Street. Noise levels were measured at the edge of the public right-of-way in front of the residential unit across from the Project Site parking structure. The primary source of noise at this location was traffic on Masselin Avenue. The secondary sources of noise were general ambient traffic noise from other roadways and people talking. A total of 50 vehicles travelled along this segment of Masselin Avenue during the 15-minute noise level measurement period.

Location 6 Curson Avenue north of Project Site: The residential building nearest to the proposed office building is located to the immediate north of the Project Site. Noise levels were measured at the edge of the public right-of-way in front of the residential building to the north of the Project Site. The primary sources of noise at this location were traffic on Curson Avenue, idling buses, and people talking. A total of 83 vehicles travelled along this segment of Curson Avenue during the 15-minute noise level measurement period.

Location 7 Wilshire Boulevard west of Curson Avenue: The La Brea Tar Pits and Page Museum are located along the northern side of Wilshire Boulevard west of Curson Avenue. Noise levels were measured within the public right-of-way in front of the Tar Pits. The primary source of noise at this location was traffic on Wilshire Boulevard. The secondary source of noise was people talking. A total of 482 vehicles travelled along this segment of Wilshire Boulevard during the 15-minute noise level measurement period.

Location 8 Curson Avenue south of Wilshire Boulevard: Multi-family residential buildings are located along the western side of Curson Avenue between Wilshire Boulevard and 8th Street. Noise levels were measured at the edge of the public right-of-way in front of the residential building at 741 Curson Avenue. The primary source of noise at this location was traffic on Curson Avenue. The secondary sources of noise were general ambient traffic noise from other roadways and people talking. A total of 71 vehicles travelled along this segment of Curson Avenue during the 15-minute noise level measurement period.



Location 9 Masselin Avenue south of Wilshire Boulevard: Multi-family residential buildings are located along the eastern side of Masselin Avenue between Wilshire Boulevard and 8th Street. Noise levels were measured at the edge of the public right-of-way in front of the residential building north of 8th Street. The primary source of noise at this location was traffic on Masselin Avenue. The secondary sources of noise were general ambient traffic noise from other roadways and people talking. A total of 60 vehicles travelled along this segment of Masselin Avenue during the 15-minute noise level measurement period.

Location 10 Wilshire Boulevard east of Masselin Avenue: Commercial and office uses are located along Wilshire Boulevard east of Masselin Avenue. Noise levels were measured within the public right-of-way in front of the office building at 5670 Wilshire Boulevard. The primary source of noise at this location was traffic on Wilshire Boulevard. The secondary source of noise was people talking. A total of 590 vehicles travelled along this segment of Wilshire Boulevard during the 15-minute noise level measurement period.

Additional information regarding each of the measurement locations, including location maps, is provided in Appendix A of the Noise Report. The daytime noise levels measured at each of the locations are identified in Table IV.H-4. The estimated peak traffic hour noise levels at the receptors along the study area roadway segments are presented in Table IV.H-5. The existing daytime noise levels are characteristic of a typical urban commercial environment.

**Table IV.H-4
Existing Daytime Noise Levels at Off-site Locations**

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics		
		L _{eq}	L _{min}	L _{max}
1. Northern property line of Project Site parking lot.	Traffic on Curson Avenue, vehicles in parking lot, construction noise in adjacent residential parking garage, people talking, children playing at Tar Pits/Page Museum.	60.4	79.2	54.9
2. Northern edge of site parking structure - top level.	General ambient traffic noise, children playing near Tar Pits/Page Museum area, landscape maintenance, sirens.	53.4	68.1	47.0
3. 6th Street west of Curson Avenue.	Traffic on 6th Street.	67.3	83.1	47.7
4. 6th Street west of Hauser Boulevard.	Traffic on 6th Street.	73.0	84.0	55.7
5. Masselin Ave. across from site parking structure.	Traffic on Masselin Avenue.	61.0	83.8	52.9
6. Curson Avenue north of Project Site.	Traffic on Curson, idling buses.	66.4	87.5	50.8
7. Wilshire Blvd. west of Curson Ave.	Traffic on Wilshire Boulevard.	72.2	90.0	55.3
8. Curson Ave south of Wilshire Blvd.	Traffic on Curson Avenue.	60.5	77.1	48.5
9. Masselin Ave. south of Wilshire Bl.	Traffic on Masselin Avenue.	58.0	74.1	51.7
10. Wilshire Blvd. east of Masselin Ave.	Traffic on Wilshire Boulevard.	69.4	81.4	57.5

Source: Cadence Environmental Consultants, June 29 2013. Noise measurement data are provided in Appendix IV.H-1.

ii) Existing Roadway Noise Levels Off-site

Existing roadway noise levels were calculated for the roadway links in the Project vicinity that have noise-sensitive uses facing the roadways. This task was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) (the FHWA Model) and traffic volumes from the Project traffic analysis. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table IV.H-5 (Existing Roadway Noise Levels Offsite).

**Table IV.H-5
Existing (2013) Roadway Noise Levels Offsite**

Roadway	Roadway Segment	Existing Land Uses	Peak Hour L_{eq}	
			AM	PM
6th Street	west of Curson Avenue	Multi-Family	70.2	69.4
	west of Hauser Boulevard	Multi-Family	74.8	74.3
Wilshire Boulevard	west of Curson Avenue	Museum & Commercial	73.6	73.6
	west of Hauser Boulevard	Commercial & Office	70.1	70.2
Curson Avenue	north of Project Site	Multi-Family	68.5	69.0
	south of Wilshire Boulevard	Multi-Family	63.6	63.9
Masselin Avenue	north of Wilshire Boulevard	Multi-Family	63.1	62.9
	south of Wilshire Boulevard	Multi-Family	60.2	60.0

Source: Cadence Environmental Consultants, June 2013. Calculation data provided in Appendix IV.H-1.

iii) Existing Groundborne Vibration Levels

Aside from seismic events, the greatest regular source of ground-borne vibration in the vicinity of the Project Site is currently roadway truck traffic. Heavy trucks currently transport materials along the roadways in the vicinity of the Project Site. These trucks typically generate ground-borne vibration velocity levels of around 63 vibration decibels (VdB), and these levels could reach 72 VdB where trucks pass over bumps in the road,¹ although no such roadway dips were observed in the immediate vicinity of the Project Site.

¹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

D. Regulatory Framework

i) Applicable City of Los Angeles Standards

The Noise Element of the City of Los Angeles General Plan identifies the noise standards that have been adopted by the City of Los Angeles for the purpose of establishing standards for noise exposure. Based on Exhibit I (Guidelines for Noise Compatible Land Use) of the Los Angeles General Plan Noise Element, the City of Los Angeles allows new office and commercial buildings to be constructed where the average noise environment in outdoor activity areas is up to 75.0 dBA CNEL, provided that the buildings are constructed using conventional techniques and materials with closed windows and fresh air or air conditioning systems.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Specifically, Section 41.40 prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the city or within 500 feet thereof. Specifically, any construction machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment may not generate a maximum noise level exceeding 75 dBA at a distance of 50 feet from the equipment. However, the above noise limitation does not apply where compliance is technically infeasible (Sections 112.05, LAMC). LAMC Section 112.05 defines technical infeasibility to mean that "said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment."

The City of Los Angeles has also adopted a Noise Ordinance (Section 111 et seq. of the LAMC), which identifies noise standards for various sources, specific noise restrictions, exemptions, and variances for sources of noise within the city. The Noise Ordinance applies to all noise sources with the exception of any vehicle that is operated upon any public highway, street or right-of-way, or to the operation of any off-highway vehicle, to the extent that it is regulated in the State Vehicle Code, and all other sources of noise that are specifically exempted. The sources regulated by the City Noise Ordinance that would be applicable to the Proposed Project are as follows:

- Section 112.01 Radios, television sets, and similar devices.
- Section 112.02 Air conditioning, refrigeration, heating, pumping, and filtering equipment.
- Section 112.04 Powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices.
- Section 112.05 Maximum noise level of powered equipment or powered hand tools.
- Section 113.01 Rubbish and trash collection.
- Section 114.02 Motor driven vehicles.

- Section 114.06 Vehicle theft alarm systems.
- Section 114.07 Audible status indicator (for vehicle theft alarms systems).
- Section 115.02 Prohibitions and regulations (for amplified sound).
- Section 114.01 Loud, unnecessary and unusual noise.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

i) Appendix G of the State CEQA Guidelines

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant impact associated with noise if any of the following were to occur:

- a) Exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies;
- b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels;
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- d) A substantial temporary or periodic increase in ambient noise levels in the project above levels existing without the project;
- e) Exposure of people residing or working in the project area to excessive noise levels if the project is located within an area covered by an airport land use plan, or where such plan has not been adopted, within two miles of a public airport or public use airport; or
- f) Exposure of people residing or working in the project area to excessive noise levels if the project is located in the vicinity of a private airstrip.

As discussed in Section IV.A Impacts Found to be Less Than Significant and the Initial Study (see Appendix I-1 to this Draft EIR), the Proposed Project would have no impact with respect to Thresholds e) and f) listed above. No further analysis of these topics is required.

ii) Applicable Noise Standards

The noise standards adopted by the City are discussed previously in this section. These standards would apply to the commercial land use that would be constructed within the Project Site.

iii) Ground-Borne Vibration

The State CEQA Guidelines do not define the levels at which ground-borne vibration or ground-borne noise are considered “excessive.” In addition, the City of Los Angeles has not adopted any thresholds for ground-borne vibration impacts. However, Caltrans has adopted the vibration standards identified

previously in Tables IV.H-2 and IV.H-3 to evaluate potential impacts related to construction activities. This analysis utilizes the Caltrans thresholds to evaluate the construction-related and operational impacts of the Proposed Project.

iv) Permanent Increase in Ambient Noise Levels

As previously discussed, a noise level increase of 3 dBA is barely perceptible to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. Based upon the criteria established in the *L.A. CEQA Thresholds Guide 2006*, a significant operational noise impact would occur if the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at the property line of residential uses where the resulting noise level would be at least 70 dBA CNEL.

v) Temporary Increase in Ambient Noise Levels

According to the *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if construction activities lasting more than 10 days in a three month period would increase the ambient noise levels by 5 dBA or more at any off-site noise-sensitive location.

B. Project Impacts

i) Construction Noise

Demolition of the existing surface parking lot and construction activities associated with the Proposed Project would require the use of heavy equipment for site preparation, grading, building construction, and site paving. Noise from smaller power tools, generators, and other sources of noise would also be associated with construction of the Proposed Project. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The Federal Highway Administration has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented in Table 6 for the types of equipment that are expected to be used at the Project Site based on industry standard practices and observations of other similar construction sites by Cadence staff.

As shown in Table IV.H-6 (Noise Levels of Typical Construction Equipment), construction equipment used for the Proposed Project could produce maximum noise levels of 73 to 90 dBA L_{max} at a distance of 50 feet from the source. Because sensitive uses are located in close proximity to the Project Site and construction equipment operating at the Site could generate noise levels in excess of 75 dBA L_{max} at 50 feet from the source, the project developer would be required to reduce the noise levels extending beyond the Project Site.

**Table IV.H-6
Noise Levels of Typical Construction Equipment**

Construction Equipment	L_{max} Noise Levels at 50 feet
Backhoe	80
Concrete Pump Truck	82
Concrete Saw	90
Crane	85
Dump Truck	84
Flat Bed Truck	84
Front End Loader	80
Gradall Forklift	85
Jackhammer	85
Paver	85
Pneumatic Tools	85
Scraper	85
Vacuum Street Sweeper	80
Welder/Torch	73
<i>Source: Federal Highway Administration, 2006.</i>	

Construction of the Proposed Project would generate a substantial temporary or periodic increase in ambient noise levels in the Project vicinity. The maximum daytime noise levels that would be expected to occur as a result of demolition, Project Site preparation, grading, building construction, and paving activities have been calculated for the sensitive uses located in close proximity to the Project Site. The calculated noise levels are shown in Table IV.H-7.

**Table IV.H-7
Maximum Daytime Construction Noise Levels**

Sensitive Receptor	Peak Daily Construction Noise Level in dBA L_{eq}					
	Existing Noise Level	Demolition	Grading	Building Const.	Paving	Parking Structure Const.
Multi-family building to the north of the new office building site	60.4	73.8	72.9	71.7	74.6	67.7
Multi-family building to the north of the parking structure	53.4	59.7	58.9	58.0	60.3	75.0
Multi-family building to the east of the parking structure	61.0	61.9	61.7	61.5	62.0	67.0

Bold numbers are 5dBA or more above existing daytime noise levels and represent a significant temporary noise impact.

Office building construction noise levels for the multi-family buildings north and east of the parking structure assume a reduction of 10.0 dBA for the existing parking structure.

Source: Cadence Environmental Consultants.

Noise level calculation data and results are provided in Appendix D of the Noise Report.

As shown, maximum daytime noise levels would be more than 5 dBA above the existing average daytime noise levels at the nearby residential locations. As such, a substantial temporary increase in ambient noise levels would occur at these nearby sensitive uses during construction of the Proposed Project. The multi-family buildings to the east of the parking structure would only be exposed to significant noise impacts during the expansion of the parking structure

Mitigation measures recommended to address these significant impacts are described in the Mitigation Measures section below.

ii) Construction-Related Groundborne Vibration

Construction activities that would occur at the Project Site have the potential to generate low levels of ground-borne vibration. The buildings adjacent to the Project consist of newer residential structures and commercial buildings of more modern steel and concrete construction. Based on the criteria identified previously in Table IV.H-3, a significant structural ground-borne vibration impact could occur if the adjacent residential buildings are exposed to vibration levels of 0.3 inches per second PPV, or if the adjacent commercial building is exposed to vibration levels of 0.5 inches per second PPV. The potential for nearby residents and commercial workers and students to be annoyed by ground-borne vibration would be significant if vibration levels reach 0.10 inches per second PPV.

Table IV.H-8 identifies various vibration velocity levels for the types of construction equipment that would operate at the Project Site during construction. Based on the information presented in Table 8, vibration levels could reach as high as approximately 0.089 inches per second PPV within 25 feet of the

an operating large bulldozer. The maximum vibration level of 0.089 inches per second PPV would be below the thresholds of significance for both potential building damage and human annoyance. Therefore, the potential impacts associated with construction vibration would be less than significant.

Table IV.H-8
Vibration Source Levels for Construction Equipment

Construction Equipment	Reference PPV at 25 feet
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003
<i>Source: California Department of Transportation, 2004.</i>	

iii) Operational Noise

Future noise levels at the Project Site would continue to be dominated by vehicular traffic on Curson Avenue. Using data provided by the project traffic engineer, the future peak hour traffic noise level along the western side of the Project Site are calculated to be less than 70.0 dBA L_{eq} (see Appendix B of the Noise Report). As a general rule 24-hour CNEL noise levels are within about 2 dBA of the peak traffic hour L_{eq} under normal traffic conditions.² This noise level would not exceed the city's 75.0 dBA CNEL exterior noise standard for new office and commercial uses. As discussed previously, the exterior-to-interior reduction of newer office buildings is generally more than 30 dBA. This is based on the situation in which new buildings must comply with California Code of Regulations ("CCR") Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, which requires substantial building insulation and also reduces exterior to interior noise levels. Assuming a 30 dBA exterior to interior noise reduction for new office uses would provide an interior noise level of less than 45 dBA CNEL, which is the state's interior standard for residential uses.

The HVAC system that would be installed for the Proposed Project would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. As discussed previously, CNELs for constant noise sources are about 6.7 dBA greater than 24-hour L_{eq} measurements. As such, the HVAC equipment associated with the Proposed Project could generate noise levels that average from 47 to 57 dBA CNEL at 50 feet from the source when the equipment is operating continuously over a 24-hour period. However, as part of the Proposed Project, these HVAC units would be mounted on the rooftop of the proposed building and would be screened from view by parapets and/or walls, as well as being provided with proper shielding to reduce noise levels. The shielding that would be installed around these systems would typically reduce noise levels by approximately 15 dBA. Thus, the noise levels from these HVAC systems could be reduced to between approximately 32 to 42 dBA L_{eq} at 50 feet from the equipment, which would result in noise levels of approximately 38.7 to 48.7 dBA CNEL. These noise levels would not exceed the City's exterior noise level standard of 65 dBA CNEL for nearby multi-family residences and would also comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on adjacent properties by more than 5 dBA.

² ICF Jones & Stokes, 2009.

Based on this information, operation of the Proposed Project would not expose persons to or generate noise levels in excess of standards established by the City of Los Angeles and the impact of the Proposed Project would be less than significant.

Locations in the vicinity of the Project Site would experience a slight increase in noise resulting from the additional traffic generated by the Proposed Project and the increased activity at the Project Site. According to the project traffic engineer, the Proposed Project would generate an increase of approximately 1,388 vehicle trips per day with 228 trips occurring during the AM peak traffic hour and 242 trips during the PM peak traffic hour. The changes in future noise levels along the study-area roadway segments in the project vicinity are identified in Table IV.H-9. As shown, the traffic generated by the Proposed Project would increase local noise levels by a maximum of 1.2 dBA L_{eq} , which would be imperceptible to most people and would not exceed the applicable thresholds of significance for the affected existing land uses. The maximum increase would occur along Masselin Avenue north of Wilshire Boulevard. The maximum increase along any other roadway segment would be 0.3 dBA L_{eq} .

The Proposed Project would also result in increased vehicular activity within the Project Site. The resulting noise levels would be similar to the existing noise levels within the parking areas within the Project Site. There would be fewer vehicles parking near the existing multi-family building along Curson Avenue north of the Project Site. The parking areas within the expanded parking structure would be shielded from the Masselin Park West apartments by solid masonry walls like the existing ones on the northern side of the parking structure. As such, the on-site activities would not substantially increase noise levels at the adjacent multi-family residential buildings.

Therefore, operation of the Proposed Project would not generate a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the project. The impact of the Proposed Project would be less than significant.

**Table IV.H-9
Project Traffic Noise Impacts Offsite**

Roadway	Roadway Segment	Noise Levels in dBA L _{eq}				
		Existing Traffic Volumes	Existing Plus Project	Increase	Significance Threshold ^a	Significant Impact?
AM Peak Hours						
6th Street	west of Curson Avenue	70.2	70.2	0.0	3.0	No
	west of Hauser Blvd.	74.8	74.9	0.1	3.0	No
Wilshire Boulevard	west of Curson Avenue	73.6	73.7	0.1	3.0	No
	west of Hauser Blvd.	70.1	70.2	0.1	3.0	No
Curson Avenue	north of Project Site	68.5	68.7	0.2	3.0	No
	south of Wilshire Blvd.	63.6	63.8	0.2	5.0	No
Masselin Avenue	north of Wilshire Blvd.	63.1	64.1	1.0	5.0	No
	south of Wilshire Blvd.	60.2	60.4	0.2	5.0	No
PM Peak Hours						
6th Street	west of Curson Avenue	69.4	69.5	0.1	3.0	No
	west of Hauser Blvd.	74.3	74.4	0.1	3.0	No
Wilshire Boulevard	west of Curson Avenue	73.6	73.7	0.1	3.0	No
	west of Hauser Blvd.	70.2	70.3	0.1	3.0	No
Curson Avenue	north of Project Site	69.0	69.3	0.3	3.0	No
	south of Wilshire Blvd.	63.9	64.1	0.2	5.0	No
Masselin Avenue	north of Wilshire Blvd.	62.9	64.1	1.2	5.0	No
	south of Wilshire Blvd.	60.0	60.2	0.2	5.0	No

^a For locations where the resulting noise level would exceed the 70 dBA "normally unacceptable" level for residential and institutional uses, the significance threshold established by the L.A. CEQA Thresholds Guide is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA

Traffic Information Source: Crain & Associates, 2013.

Table Source: Cadence Environmental Consultants, June 2013.

iv) Operational-Related Groundborne Vibration

The Proposed Project does not include uses that are expected to generate measurable levels of groundborne vibration during operation of the Proposed Project. The Proposed Project, as a commercial development, would not include stationary equipment that would result in high vibration levels, which are more typical for large industrial projects. Although groundborne vibration at the Project Site and immediate vicinity currently occurs from heavy-duty vehicular travel (e.g., heavy duty trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in a substantial increase in these heavy-duty vehicles. The greatest regular source of Project-related groundborne vibration would be from delivery trucks and garbage trucks traveling to and from the

Project Site. Trucks typically generate groundborne vibration velocity levels of around 63 VdB, and these levels could reach 72 VdB where trucks pass over bumps in the road.³ Because these vibration levels would not exceed the FTA's 80 VdB threshold for infrequent events at residential uses and the 83 VdB threshold for infrequent events at institutional uses, impacts from vibration would be less than significant at nearby sensitive uses.

4. CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with other related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized Wilshire Community Plan area of the City of Los Angeles. The Draft Traffic Impact Study for the Proposed Museum Square Office Building at 5757 Wilshire Boulevard, City of Los Angeles identifies 48 related projects within the an approximate 2-mile radius of the proposed Project Site.⁴ Of these projects, 28 are located within the City of Los Angeles, six are in the City of Beverly Hills, and 14 are in the City of West Hollywood.

A. Construction

The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise and ground-borne vibration for the Proposed Project and each related project (that has not yet been built) would be localized. The nearest related project is a new commercial and office building proposed for 5900 Wilshire Boulevard (related project location number 19). That project is located far enough away that construction activities at that location would have very little noise effect and no ground-borne vibration effect on the sensitive residential uses in the close proximity to the proposed Project Site. Other than related project location number 19, all of the other related general development Project Sites are located over 1,000 feet away from the Project Site and, therefore, would not be close enough to contribute to a direct cumulative construction noise or ground-borne vibration impact.

Therefore, the Proposed Project would not contribute to significant short-term cumulative construction related noise impacts in the immediate vicinity of the Project Site.

B. Operational

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing roadway noise levels and future noise levels with the Proposed Project and cumulative development. The noise levels associated with existing traffic volumes and future year 2016 traffic volumes with the Proposed Project are identified in Table IV.H-10. As shown, the traffic generated by the Proposed Project and cumulative development would increase local noise levels by a maximum of 1.3 dBA L_{eq} , which is

³ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

⁴ *Crain & Associates, 2013.*

inaudible/imperceptible to most people and would not exceed the City of Los Angeles thresholds of significance. Therefore, this cumulative impact would be less than significant.

With respect to stationary operational noise sources, all related projects would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. In addition, all related projects would require exterior walls to be constructed to provide a Sound Transmission Class of 50 or greater as defined in Uniform Building Code No. 35-1, 1979 edition or any amendment thereto, or would be required to ensure that interior noise levels are less than 45 dBA CNEL in any habitable room to comply with Title 24 of the State Building Code. As discussed previously, the Proposed Project would shield on-site equipment (i.e., HVAC system), and operational noise levels would not exceed city's standards. Therefore, the Proposed Project would not contribute to cumulative noise impact associated with stationary and on site operational noise sources.

**Table IV.H-10
Cumulative Project Traffic Noise Impacts Offsite**

Roadway	Roadway Segment	Noise Levels in dBA L _{eq}				
		Existing Traffic	Future Plus Project ^a	Increase	Significance Threshold ^b	Significant Impact?
AM Peak Period						
6th Street	west of Curson Avenue	70.2	70.5	0.3	3.0	No
	west of Hauser Blvd.	74.8	75.1	0.3	3.0	No
Wilshire Boulevard	west of Curson Avenue	73.6	74.2	0.6	3.0	No
	west of Hauser Blvd.	70.1	70.7	0.6	3.0	No
Curson Avenue	north of Project Site	68.5	68.9	0.4	3.0	No
	south of Wilshire Blvd.	63.6	64.2	0.6	5.0	No
Masselin Avenue	north of Wilshire Blvd.	63.1	64.2	1.1	5.0	No
	south of Wilshire Blvd.	60.2	60.6	0.4	5.0	No
PM Peak Period						
6th Street	west of Curson Avenue	69.4	69.7	0.3	3.0	No
	west of Hauser Blvd.	74.3	74.6	0.3	3.0	No
Wilshire Boulevard	west of Curson Avenue	73.6	74.3	0.7	3.0	No
	west of Hauser Blvd.	70.2	70.9	0.7	3.0	No
Curson Avenue	north of Project Site	69.0	69.5	0.5	3.0	No
	south of Wilshire Blvd.	63.9	64.5	0.6	5.0	No
Masselin Avenue	north of Wilshire Blvd.	62.9	64.2	1.3	5.0	No
	south of Wilshire Blvd.	60.0	60.3	0.3	5.0	No

^a Includes cumulative traffic

^b For locations where the resulting noise level would exceed the 70 dBA "normally unacceptable" level for residential and institutional uses, the significance threshold established by the L.A. CEQA Thresholds Guide is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA

Traffic Information Source: Crain & Associates, 2011.

Table Source: Cadence Environmental Consultants, 2013.

5. REGULATORY COMPLIANCE MEASURES AND MITIGATION MEASURES

Regulatory Compliance Measures:

- RC-NOI-1 Construction Schedule.** The proposed Modified Project shall comply with the City of Los Angeles Municipal Code, which limits exterior construction hours to Monday through Friday, 7:00 a.m. to 6:00 p.m., and Saturday from 8:00 a.m. to 6:00 p.m. No construction activities would occur on Sundays or federal holidays.
- RC-NOI-2 Hauling Activities.** Hauling activities shall be limited to the hours of 8:30 a.m. to 4:30 p.m., Monday through Saturday. No hauling would occur on Sundays or federal holidays.
- RC-NOI-3 Compliance with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574.** The proposed Modified Project shall comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574 and any subsequent ordinances that prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Mitigation Measures:

- MM-NOI-1** All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- MM-NOI-2** Construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.
- MM-NOI-3** Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. Examples include the use of drills and jackhammers.
- MM-NOI-4** Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the residential uses within a radius of 200 feet from the Project Site disclosing the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. This notification shall also provide a contact name and phone number for residents to call for construction noise related complaints. All reasonable concerns shall be addressed within 48 hours of receipt.
- MM-NOI-5** The Project Developer shall install a temporary noise control barrier in the northern area of the office building construction site. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multi-family residential structure by the maximum amount feasible, with a goal of a reduction of 10 dBA. If feasible, the barrier shall be a similar height to the multi-

family residential building to the north of the Project Site. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed in the northern façade of the new office building and paving activities in the office Project Site are complete.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

A temporary barrier of acoustic blankets, or other such devices can be used along a site boundary to reduce noise levels from a construction site. In the case of this Proposed Project, it appears to be feasible to install a temporary barrier of acoustic blankets or other sound attenuating designs, along the northern perimeter of the new office building site. This barrier is estimated to reduce construction-related noise levels at the adjacent multi-family residential structure by up to 10 dBA. The existing parking structure would act as a noise barrier between the office building construction site and the multi-family buildings to the north and east of the parking structure. The parking structure would not, however, provide much noise attenuation for the construction activities associated with the parking structure expansion component of the project. It does not appear to be feasible to install a temporary acoustic barrier along the northern, eastern, or western perimeters of the existing parking structure. The parking structure is constructed along the northern and eastern perimeters of the office property and it would not be feasible to install a temporary wall within the residential properties to the north of the parking structure or within the right-of-way along Masselin Avenue. In addition, continued access to the lower levels of the parking structure would need to be provided throughout the construction phase of the parking structure expansion.

The implementation of the Regulatory Compliance Measure RC-NOI-1 through RC-NOI-3 and Mitigation Measures MM-NOI-1 through MM-NOI-5 listed above, which would require the implementation of noise reduction devices and techniques during construction at the Project Site, along with compliance with the noise regulations under Section 41.40 of the LAMC, would reduce construction noise impacts to the maximum extent feasible, in accordance with the City of Los Angeles Noise Ordinance.

However, implementation of these measures would not reduce the construction-related noise levels to less than five dBA L_{eq} above the existing daytime noise levels at the nearby residential uses. Therefore, the short-term construction-related noise impact of the Proposed Project would be significant and unavoidable.

The construction and operational impacts associated with groundborne vibration resulting from the Proposed Project would be less than significant without mitigation.

The operational impacts associated with noise resulting from the Proposed Project would be less than significant without mitigation.

The cumulative construction and operational impacts associated with noise resulting from the Proposed Project would be less than significant without mitigation.

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. TRAFFIC / TRANSPORTATION

1. INTRODUCTION

The following section summarizes the information provided in the following traffic studies and collectively referred to as the Traffic Study:

Traffic Impact Study for The Proposed Museum Square Office Building at 5757 Wilshire Boulevard, City of Los Angeles, prepared by Crain & Associates in March 2013;

A Supplemental Traffic Impact Analysis at the Intersection Of Martel Avenue-Hauser Boulevard/3rd Street, prepared by Crain & Associates in July 2013; and

A Construction Traffic Impact Analysis, prepared by Crain & Associates in July 2013.

Westside Subway Extension (Purple Line) Project Construction Transportation Impacts, prepared by Crain & Associates in January 2014

Copies of these studies/analyses are incorporated herein by this reference, and are provided as Appendix IV.I-1, IV.I-2, IV.I-3, and IV.I-4 to this Draft EIR.

2. ENVIRONMENTAL SETTING

The full Museum Square site is a rectangular shaped property that is approximately 7-1/2 acres (327,613 square feet); it is fully developed with a commercial office complex an associated surface parking lot and five-story parking structure. The full site is bounded by Wilshire Boulevard to the south, Curson Avenue to the west, Masselin Avenue to the east and multi-family residential development to the north. The Museum Square site is located in the Wilshire Community Plan Area of the City of Los Angeles. The Museum Square site is located in the vicinity of several major transportation corridors that connect the Project area to the regional transportation system.

A. Area Transportation Facilities

The Museum Square site and surrounding uses are well-served by Major and Secondary Highways, including Beverly Boulevard, 3rd Street, 6th Street, Wilshire Boulevard, Olympic Boulevard, San Vicente Boulevard, Crescent Heights Boulevard, Fairfax Avenue, La Brea Avenue, and Highland Avenue. In addition to the local surface street system, the Santa Monica Freeway (Interstate 10) is located approximately two miles south of the Museum Square site and provides access to the regional freeway network. The key transportation facilities in the Project vicinity are discussed below.

Freeways

The Santa Monica Freeway (I-10) is a primary east-west arterial in the County of Los Angeles. This facility, located approximately two miles south of the Project Site, provides a continuous route from the City of Santa Monica through Downtown Los Angeles and continues eastward through the Counties of San Bernardino and Riverside. South of the Project Site, the Santa Monica Freeway provides four mainline travel lanes in each direction, with auxiliary lanes between some ramp locations. Interchanges

are provided at La Cienega Boulevard, Fairfax Avenue, La Brea Avenue, and Crenshaw Boulevard. According to the most current (2011) data available through the California Department of Transportation (“Caltrans”) website, annual average daily traffic (AADT) volumes on the Santa Monica Freeway, between La Brea Avenue and Crenshaw Boulevard, are approximately 275,000 vehicles per day (VPD), with peak hour volumes of approximately 19,000 vehicles per hour (VPH).

Streets and Highways

Beverly Boulevard is an east-west Major Highway Class II throughout the Wilshire Community Plan Area. This roadway serves as a major arterial in the greater Los Angeles area, extending from Santa Monica Boulevard in the City of Beverly Hills to the Westlake community of Los Angeles, where it becomes 1st Street. In the Project study area, this roadway generally provides two through travel lanes per direction, with left and right-turn channelization provided at major intersections. Parking is provided intermittently on both sides of Beverly Boulevard within the Project study area.

3rd Street is an east-west Secondary Highway within the Wilshire Community Plan Area. The roadway runs from its westerly terminus at Civic Center Drive in the City of Beverly Hills, discontinuously through the City of Los Angeles, to the unincorporated area of East Los Angeles in the County of Los Angeles, where it becomes Pomona Boulevard. In the Project study area, this roadway generally provides two through travel lanes per direction, with left- and right-turn channelization provided at major intersections. Parking is provided intermittently along the north side of 3rd Street within the Project study area. At its intersection with Crescent Heights Boulevard, eastbound and westbound left-turn movements from 3rd Street are not allowed during the weekday AM and PM peak periods.

6th Street is an east-west Secondary Highway, east of Fairfax Avenue, and a Collector Street, west of Fairfax Avenue, within the Wilshire Community Plan Area. The roadway runs from its westerly terminus at San Vicente Boulevard to the Los Angeles River, where it becomes Whittier Boulevard. In the Project study area, this roadway generally provides two through travel lanes per direction, with left-turn channelization provided at major intersections. Parking is provided along both sides of 6th Street within the Project study area, with certain restrictions. At its intersections with Hauser Boulevard and La Brea Avenue, eastbound and westbound left turns from 6th Street are not permitted during the weekday AM and PM peak periods.

Wilshire Boulevard is an east-west Major Highway Class II within the Wilshire Community Plan Area. This roadway serves as a major arterial in the greater Los Angeles area, extending from Ocean Avenue in the City of Santa Monica to Grand Avenue in Downtown Los Angeles. The Museum Square site is bounded by Wilshire Boulevard to the south. In the vicinity of the Project Site, this roadway generally provides three through travel lanes per direction, with left-turn channelization provided at major intersections. Parking is provided on both sides of Wilshire Boulevard within the Project study area; however, parking is prohibited during the weekday peak periods. A raised median exists along the roadway segment between Fairfax Avenue and La Brea Avenue.

Olympic Boulevard is an east-west Major Highway Class II within the Wilshire Community Plan Area. This roadway extends from 5th Street in the City of Santa Monica to 4th Street in the City of Montebello. In the vicinity of the Project Site, this roadway generally provides three through travel lanes per direction, separated by a two way left-turn lane. Left-turn channelization is provided at major intersections. Parking is provided on both sides of Olympic Boulevard within the Project study area; however, parking is prohibited during the weekday peak periods.

San Vicente Boulevard is a Major Highway Class II with a general southeast-northwest alignment within the Wilshire Community Plan Area. This roadway extends from Sunset Boulevard in the City of West Hollywood to Venice Boulevard in the Wilshire Community Plan Area. In the Project study area, this roadway generally provides three through travel lanes per direction, with left and right-turn channelization provided at major intersections. Parking is provided on both sides of San Vicente Boulevard within the Project study area. A raised median exists along the roadway segment throughout the Project study area.

Crescent Heights Boulevard is a north-south Secondary Highway, north of San Vicente Boulevard, and a Collector Street, south of San Vicente Boulevard, within the Wilshire Community Plan Area. This roadway extends discontinuously from its southerly terminus near Guthrie Avenue to the Hollywood community, where it becomes Laurel Canyon Boulevard. In the Project study area, this roadway generally provides two through travel lanes per direction. Parking is provided along both sides of Crescent Heights Boulevard within the Project study area; however, parking on the west side of the roadway is prohibited during the AM peak period and parking on the west side is prohibited during the PM peak period. During the weekday AM and PM peak periods, northbound and southbound left turns from Crescent Heights Boulevard are not allowed at its intersections with 3rd Street and 6th Street.

Fairfax Avenue is a north-south Secondary Highway within the Wilshire Community Plan Area. This roadway extends discontinuously from its southerly terminus at 64th Street to just north of Hollywood Boulevard. In the Project study area, this roadway generally provides two through travel lanes per direction separated by a two-way left-turn lane, with left- and/or right-turn channelization provided at major intersections. Parking is provided intermittently along both sides of Fairfax Avenue within the Project study area. At its intersection with Olympic Boulevard, left-turn movements from southbound Highland Avenue are prohibited.

Curson Avenue is a north-south Collector Street within the Wilshire Community Plan Area. The roadway runs discontinuously from just south of the Santa Monica Freeway to its northerly terminus within the Park La Brea residential community. The Museum Square site is bounded by Curson Avenue to the west. In the Project study area, this roadway provides one through travel lane per direction, with left-turn channelization provided at major intersections. Speed humps are provided along Curson Avenue between 8th Street and Olympic Boulevard and to the south of Olympic Boulevard. Parking is provided intermittently along both sides of Curson Avenue within the Project study area. Approximately 95 feet east of the intersection of Curson Avenue and Wilshire Boulevard, a northbound one-way leg is provided that connects Wilshire Boulevard to Curson Avenue. Given the presence of a raised median along Wilshire Boulevard, this northbound one-way leg serves only westbound motorists on Wilshire Boulevard by allowing right-turns onto northbound Curson Avenue in advance of the signalized intersection. A triangular-shaped raised median separates Curson Avenue from the northbound one-way leg.

Masselin Avenue is a north-south Local Street within the Wilshire Community Plan Area. The roadway runs from Pico Boulevard to 6th Street and also serves as the easterly boundary of the Project Site. In the Project study area, Masselin Avenue provides one through travel lane per direction, with parking provided along both sides of the roadway. Speed humps are provided along Masselin Avenue between Wilshire Boulevard and Olympic Boulevard.

Hauser Boulevard is a north-south Collector Street within the Wilshire Community Plan Area. The roadway runs discontinuously from just south of Rodeo Road to 3rd Street, where it becomes Martel Avenue. In the Project study area, this roadway generally provides one through travel lane per

direction, with left- and/or right-turn channelization provided at major intersections. Parking is provided intermittently along both sides of Hauser within the Project study area.

La Brea Avenue is a north-south Major Highway Class II within the Wilshire Community Plan Area. This roadway extends from its southerly terminus in the unincorporated area of Lennox in the County of Los Angeles (where it becomes Hawthorne Boulevard) to just north of Franklin Avenue. In the Project study area, this roadway generally provides three through travel lanes per direction, separated by a two-way left-turn lane. Left-turn channelization is provided at major intersections. Parking is provided on both sides of La Brea Avenue within the Project study area; however, parking is prohibited during the weekday peak periods.

Highland Avenue is a north-south Secondary Highway, north of Edgewood Place, and a Local Street, south of Edgewood Place, within the Wilshire Community Plan Area. This roadway extends discontinuously from its southerly terminus near Santa Monica Freeway to the Hollywood Freeway (US-101) in the Hollywood community. In the Project study area, this roadway generally provides two through travel lanes per direction, with left- and/or right-turn channelization provided at major intersections. Parking is provided along both sides of Highland Avenue within the Project study area. At its intersection with 3rd Street, northbound and southbound left-turn movements from Highland Avenue are not allowed during the weekday AM and PM peak periods.

Public Transportation

The Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT provide several bus lines in the Project study area. A number of these bus routes are within a reasonable walking distance of the Museum Square site (approximately one-quarter mile), providing public transportation access for employees of the Proposed Project. These lines include Metro Local Lines 20, 212/312, and 217; Metro Rapid Lines 720 and 780; and LADOT DASH Fairfax. The bus routes in the Project study area are shown in Figure IV.I-1. The public transit routes serving the immediate Project vicinity are described in detail below.

Metro Bus Service

Metro Local Line 20 provides east-west local service between the City of Santa Monica and Downtown Los Angeles. The route travels primarily along Wilshire Boulevard, with stops in Westwood, the City of Beverly Hills, the Wilshire Community Plan Area, Koreatown, and Westlake. Line 20 operates daily with headways of approximately 5 to 15 minutes during the weekday AM and PM peak hours. Saturday and Sunday service is provided with headways of approximately 15 to 30 minutes. There is a Line 20 bus stop immediately adjacent to the Museum Square site on Wilshire Boulevard at Curson Avenue.

Metro Local Line 212/312 provides north-south local service between the City of Hawthorne and the Hollywood community, with a route running through the City of Inglewood, Baldwin Hills, and the Wilshire Community Plan Area. Line 212/312 operates daily with headways of approximately 5 to 10 minutes during the weekday AM and PM peak hours. Saturday and Sunday service is provided with headways of approximately 15 to 40 minutes throughout most of the day. Line 212/312 has a bus stop on La Brea Avenue at Wilshire Boulevard.

Metro Local Line 217 provides north-south local service between the communities of Westchester and Hollywood, with a route running through Baldwin Hills, the Wilshire Community Plan Area, the City of West Hollywood, Hollywood, and Los Feliz. Line 217 operates daily with headways of approximately 10 to 20 minutes during the weekday AM and PM peak hours. Saturday and Sunday service is provided

with headways of approximately 10 to 30 minutes throughout most of the day. In the Project vicinity, a bus stop for Line 217 is provided on Fairfax Avenue at Wilshire Boulevard.

Metro Rapid Line 720 provides east-west rapid service between the Cities of Santa Monica and Commerce. The route travels primarily along Wilshire Boulevard, 5th/6th Streets, and Whittier Boulevard, with stops in Westwood, the Wilshire Community Plan Area, Westlake, Downtown Los Angeles, and East Los Angeles. Line 720 operates daily with headways of approximately 2 to 10 minutes during the weekday AM and PM peak hours. Saturday and Sunday service is provided with headways of approximately 5 to 15 minutes throughout most of the day. In the Project vicinity, Line 720 has bus stops on Wilshire Boulevard at Fairfax Avenue and La Brea Avenue.

Metro Rapid Line 780 provides east-west rapid service between the Mid-City community of Los Angeles and the City of Pasadena, with a route running through the Wilshire Community Plan Area, the City of West Hollywood, Hollywood, Los Feliz, the City of Glendale, and Eagle Rock. Line 780 operates daily with headways of approximately 10 to 20 minutes during the weekday AM and PM peak hours. No service is provided on Saturdays, Sundays, or holidays. A bus stop for this line is available on Fairfax Avenue at Wilshire Boulevard.

LADOT Bus Service

LADOT DASH Fairfax is a shuttle service that provides east-west local access throughout the Wilshire Community Plan area (including the Miracle Mile, Park La Brea, and Fairfax Village communities), the City of West Hollywood, and the Cedars-Sinai Medical Center. Near the Project Site, DASH Fairfax operates in a clockwise loop on Hauser Boulevard, 6th Street, La Brea Avenue, Wilshire Boulevard, and Fairfax Avenue. DASH Fairfax operates every weekday, between 7:00 AM and 7:00 PM, with headways of approximately 30 minutes. Saturday service is also provided, between 9:00 AM and 7:00 PM, with headways of approximately 30 minutes. In the vicinity of the Project Site, bus stops are provided on Wilshire Boulevard at Curson Avenue and Masselin Avenue.

In addition to the routes described above, additional public bus and rail opportunities are available via transfers to other lines and/or transit providers. When transfer opportunities are considered, the greater Los Angeles region is readily accessible from the Museum Square site by the transit system.

Given the proximity of the Museum Square site to these services and the availability of transfer opportunities, the Project is well served by public transit. For this reason, it is expected that some of the person trips generated by the Project will utilize public transportation as their primary travel mode, instead of using private vehicles.

B. Study Area

The following 24 study intersections and two street segment locations were selected in consultation with LADOT; all intersections are signalized. The locations of these study intersections and street segment are depicted in Figure IV.I-2, Study Intersections and Street Segments.

Study Intersections

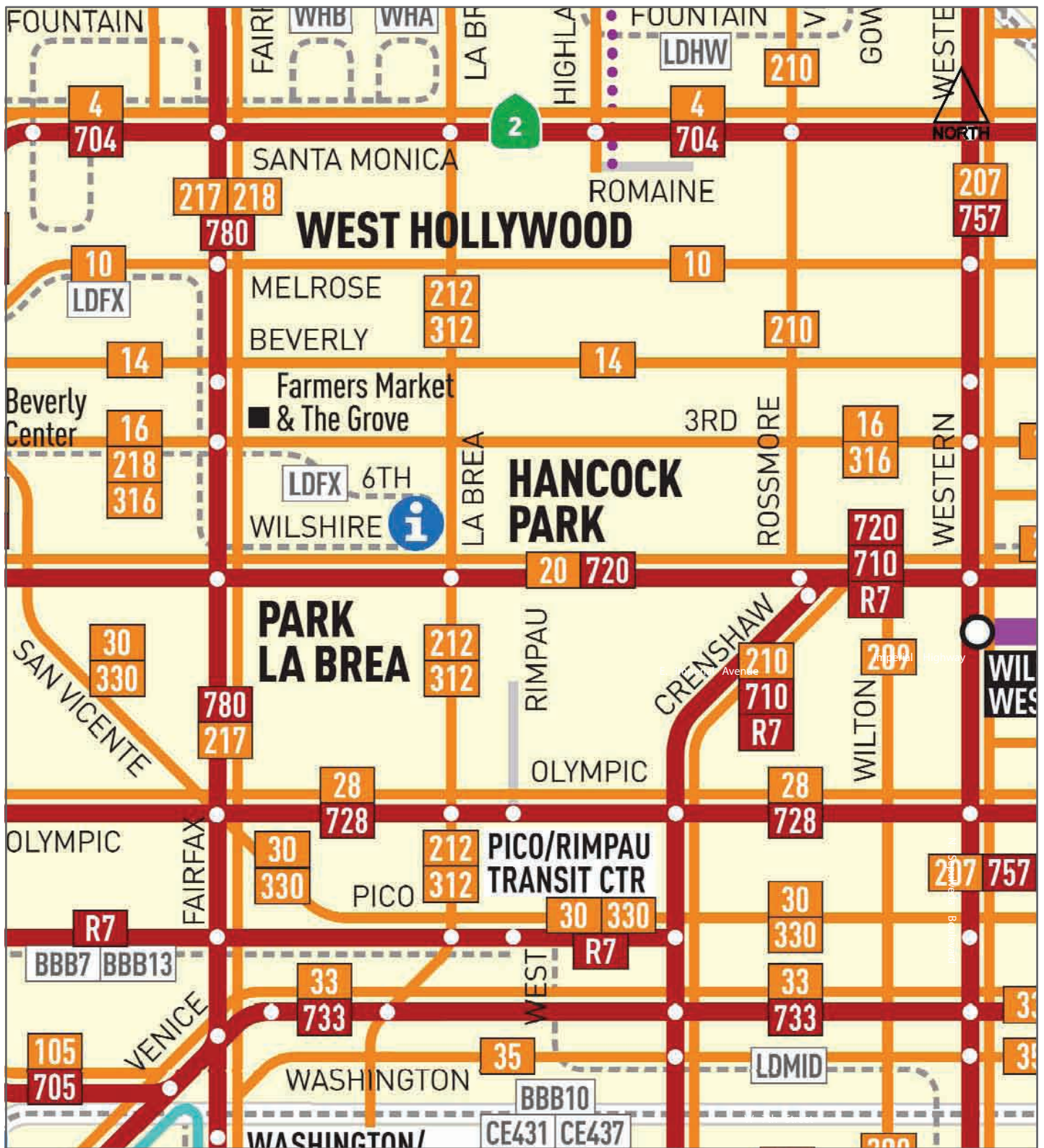
1. Crescent Heights Boulevard / 3rd Street
2. Crescent Heights Boulevard / 6th Street
3. Fairfax Avenue / Beverly Boulevard
4. Fairfax Avenue / 3rd Street

5. Fairfax Avenue / 6th Street
6. Fairfax Avenue / Wilshire Boulevard
7. Fairfax Avenue / Olympic Boulevard
8. Curson Avenue / 6th Street
9. Curson Avenue / Wilshire Boulevard
10. Curson Avenue / Olympic Boulevard
11. Masselin Avenue / Wilshire Boulevard
12. Hauser Boulevard / 6th Street
13. Hauser Boulevard / Wilshire Boulevard
14. Hauser Boulevard / Olympic Boulevard
15. Hauser Boulevard / San Vicente Boulevard
16. La Brea Avenue / Beverly Boulevard
17. La Brea Avenue / 3rd Street
18. La Brea Avenue / 6th Street
19. La Brea Avenue / Wilshire Boulevard
20. La Brea Avenue / Olympic Boulevard
21. La Brea Avenue / San Vicente Boulevard
22. Highland Avenue / 3rd Street
23. Highland Avenue / Wilshire Boulevard
24. Martel Avenue / Hauser Boulevard¹

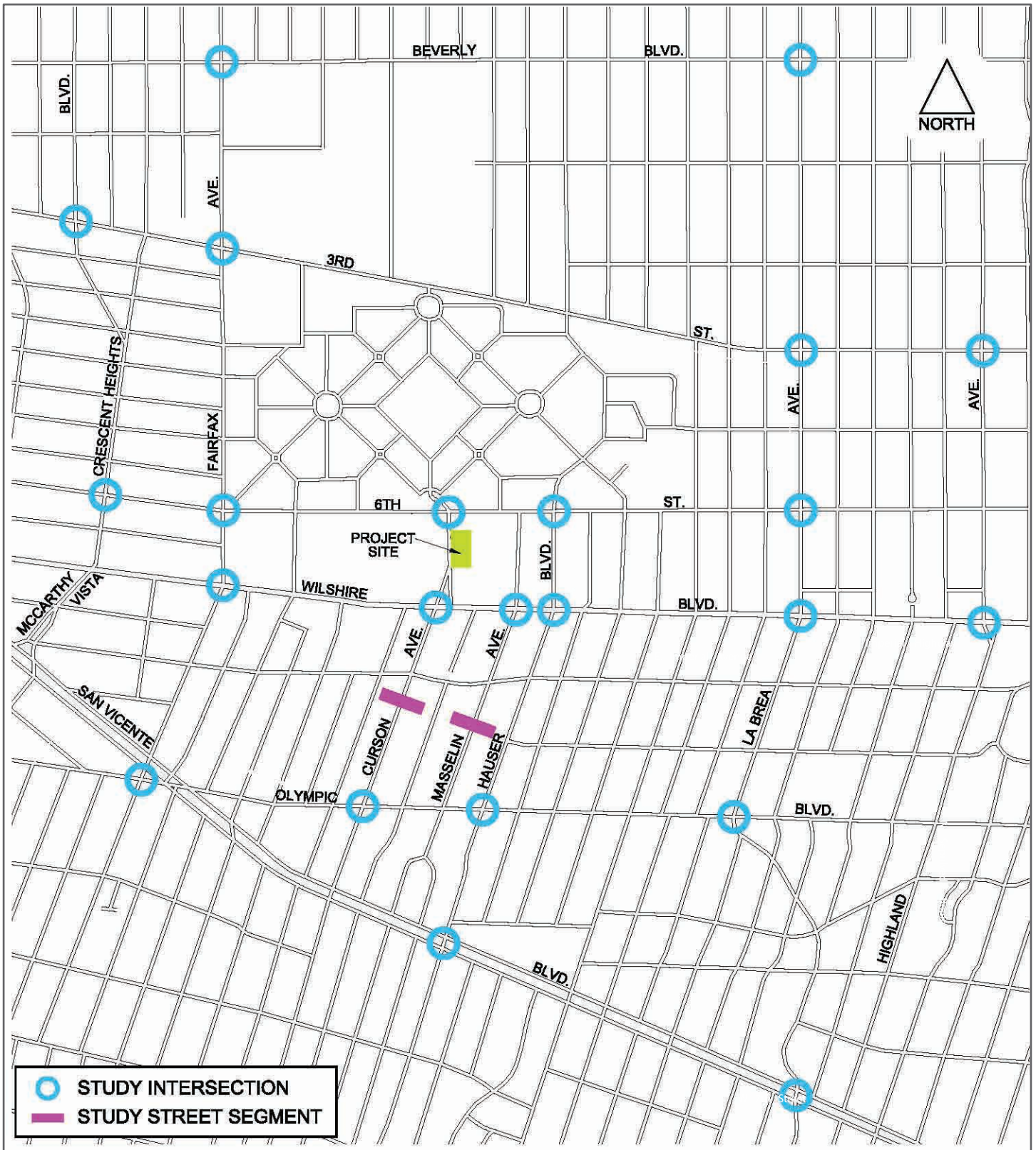
Residential Street Segments

1. Curson Avenue, south of 8th Street
2. Masselin Avenue, south of 8th Street

¹ Note: this intersection was added following comments received from the public during the Notice of Preparation (NOP) public scoping meeting held on May 22, 2013



Source: Crain & Associates, March 12, 2013.



Source: Crain & Associates, March 12, 2013.

C. Related Projects

The list of related projects was based on information currently on file of potential projects located in the surrounding area ("related projects") that might be developed or under construction within the study time frame were obtained from LADOT, City of Beverly Hills Planning Department, and City of West Hollywood Planning Department. Recently published traffic studies and environmental reports for development projects in the area were also reviewed. Related projects from these sources and within an approximate 2.0-mile radius of the Museum Square site were included. Refinement of the information resulted in a total of 48 related projects in the surrounding area that could add traffic to the study intersections. Of the 48 related projects, 28 are located in the City of Los Angeles, six are in the City of Beverly Hills, and 14 are in the City of West Hollywood.

The related project locations, descriptions, and trip generation estimates are listed in Table IV.I-1. This list of related projects accurately reflects the known related project proposals at the time the traffic study Memorandum of Understanding was scoped with and approved by LADOT. The locations of the related projects are shown in Figure IV.I-3.

The number of trips expected to be generated by the related projects was obtained from information provided by public agencies, traffic studies and environmental reports, to the extent available. For related projects with incomplete peak-hour directional (inbound/outbound) distribution information, directional estimates were determined by applying the appropriate directional splits from the ITE Trip Generation (9th Edition, 2012) manual. This ITE Trip Generation information is provided in Appendix D.

Summing the individual related Project traffic volume assignments, the total related project traffic volumes at the study intersections were calculated and are shown in Figures Figure IV.I-4 and Figure IV.I-5 for the AM and PM peak hours, respectively.

It should also be noted that although the Los Angeles County Museum of Art has been the subject of news stories regarding redevelopment, no development plans have been filed with the City at this time, thus the project remains speculative and is not included in this analysis.

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
City of Los Angeles										
1	Archstone Hollywood Mixed-use Project ¹	7,276 sf Specialty Retail 7,825 sf Quality Restaurant 40,654 sf Office 348 du Apartment (8) du Single-Family Housing ^a (4) du Apartment (30,000) sf Warehousing ((6,000) sf Avon Studio Transportation (5,600) sf Premium Collision Center (4,400) sf Melrose Tow (5,600) sf Vacant Buildings	6911 W Santa Monica Blvd.	2,135	(5)	110	105	132	49	181
2	The Lexington Development Mixed-use Project ²	786 du Mid-Rise Apartment 4,000 sf High-Turnover Restaurant 5,500 sf Fast-Food Restaurant w/out Drive-Through Window 12,700 sf Specialty Retail (43,226) sf Nightclubs (17,596) sf Hardware/Paint Store (50,972) sf Mini-Warehouse (18,660) sf Vacant Banquet Hall	6677 W Santa Monica Blvd.	1,938	127	182	309	172	121	293
3	936 N La Brea Avenue ³	88,750 sf Office 12,000 sf Retail	936 N La Brea Avenue	1,130	85	12	97	18	87	105
4	La Brea Gateway Project Mixed-use Project ⁴	179 du Apartment 33,500 sf Supermarket (14,530) sf KCOP Admin. Office	915 N La Brea Avenue	2,615	6	85	91	157	91	248

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
		<i>(42,136) sf KCOP Studio</i>								
5	6601 W Romaine Street ³	104,155 sf Office 19,700 sf Storage	6601 W Romaine Street	808	81	11	92	9	42	51
6	959 N Seward Street ⁵	240,000 sf Office	959 N Seward Street	2,337	297	39	336	58	252	310
7	956 N Seward Street ³	130,000 sf Office	956 N Seward Street	1,240	164	22	186	31	149	180
8	712 N Wilcox Avenue ⁶	100 du Apartment	712 N Wilcox Avenue	535	8	32	40	33	17	50
9	Yeshivath Torath Emeth Academy Expansion ⁷	120 stu Pre-K & Kindergarten 60 stu Nursery School	7002 W Clinton Street	0	20	18	38	11	12	23
10	7901 W Beverly Boulevard Mixed-use Project ⁶	71 du Apartment 11,454 sf Retail	7901 W Beverly Boulevard	493	7	29	36	30	16	46
11	111 S The Grove Drive ⁸	171,225 sf Self-Storage Facility	111 S The Grove Drive	409	14	12	26	22	21	43
12	La Brea Mixed-Use Project ⁹	26,400 sf Retail 180 du Condominium 3,000 sf Restaurant	101 S La Brea Avenue	1,503	11	52	63	62	30	92
13	3rd & Fairfax Gilmore Project ¹⁰	43,250 sf Retail	7929 W 3rd Street	958	47	29	76	52	57	109
14	6298 W 3rd Street ⁹	300 du Condominium	6298 W 3rd Street	(248)	17	85	102	(17)	(8)	(25)
15	Third Street Mixed-Use Project ⁶	60 du Apartment 5,350 sf Retail	5863 W 3rd Street	492	5	22	27	31	16	47
16	6535 Wilshire Boulevard Mixed-Use Project ³	57,000 sf Office 21 du Apartment 6,000 sf Retail	6535 Wilshire Boulevard	881	75	10	85	16	77	93
17	Wilshire Skyline Project Mixed-Use Project ⁶	130 du Apartment 32,000 sf Retail <i>(9,600) sf Restaurant</i>	6411 W Wilshire Boulevard	1,730	27	109	136	89	48	137
18	Wilshire & Crescent Heights	158 du Apartment 4 du Townhome	6245 W Wilshire Boulevard	1,214	29	74	103	32	2	34

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
	Mixed-Use Project ¹¹	4,200 sf Bank 1,570 sf Coffee/Fast Food 1,080 sf Ground Floor Retail <i>(7,117) sf Wells Fargo Bank</i>								
19	5900 Wilshire Commercial Project ¹²	489,564 sf Office 14,688 sf Health Club 7,344 sf Quality Restaurant 3,500 sf High-Turnover Restaurant <i>(477,220) sf Office</i> <i>(14,688) sf Health Club</i> <i>(14,688) sf Museum</i>	5900 W Wilshire Boulevard	530	9	8	17	33	10	43
20	725 S Curson Avenue ³	28,800 sf Office 800 sf Restaurant	725 S Curson Avenue	419	48	6	54	9	43	52
21	Desmond's Tower Project ¹³	175 du Apartment	5500 W Wilshire Boulevard	842	12	49	61	52	28	80
22	5410 W Wilshire Boulevard ¹⁴	6,760 sf Restaurant 590 sf Retail Expansion	5410 W Wilshire Boulevard	346	(3)	(1)	(4)	18	9	27
23	Wilshire and La Brea Project ¹⁵	562 du Mid-Rise Apartment 37,000 sf Retail 3,000 sf High-Turnover Restaurant 5,000 sf Quality Restaurant <i>(35,000) sf Church</i> <i>(30,000) sf Retail</i>	5200 W Wilshire Boulevard	2,188	41	91	132	122	80	202
24	1417 Hi Pointe Street ⁶	77 du Apartment	1417 Hi Pointe Street	460	7	27	34	27	15	42
25	Mid-City Vons Project ¹⁶	55,920 sf Supermarket <i>Existing Supermarket</i>	1430 S Fairfax Avenue	1,838	46	28	74	20	19	39
26	Washington Square Redevelopment Project ¹⁷	217 du Condominium/Townhome 125 du Apartment 230,000 sf Shopping Center	4040 W Washington Blvd.	4,055	45	117	162	209	167	376

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
		<i>(111,000) sf Shopping Center</i>								
27	Academy Museum of Motion Pictures ²⁰	50,500 sf Exhibit Areas 19,500 sf Collections & Exhibit Support 54,500 sf Theater & Theater Support 5,000 sf Museum Store 4,000 sf Museum Café 33,000 sf Lobby & Visitor Services 23,000 sf Administration 26,000 sf Event/Function Space 3,000 sf Kitchen/Catering 10,500 sf Restrooms	6067 Wilshire Boulevard	N/A						
28	Metro Purple Line Extension ²¹	3.9 miles of subway underneath Wilshire Boulevard btwn Western Avenue and just west of La Cienega		N/A						
City of Beverly Hills										
1	9230 Wilshire Boulevard ¹⁸	150,300 sf Automobile Sales	9230 Wilshire Boulevard	3,000	64	44	108	41	76	117
2	9200 Wilshire Boulevard Mixed-Use Project ¹⁸	53 du Condominium 8,400 sf Retail 5,600 sf Quality Restaurant	9200 Wilshire Boulevard	2,172	28	36	64	106	86	192
3	8767 Wilshire Boulevard ¹⁸	60,856 sf Office 11,260 sf Retail 3,000 sf High-Turnover (Sit-Down) Restaurant	8767 Wilshire Boulevard	2,693	127	45	172	106	165	271
4	8600 Wilshire Boulevard Mixed-Use Project ¹⁸	21 du Condominium 4,800 sf Retail <i>(2,500) sf Retail</i>	8600 Wilshire Boulevard	960	14	17	31	43	43	86
5	121 San Vicente	35,000 sf Medical-Dental Office	121 San Vicente Boulevard	1,265	68	18	86	35	95	130

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
	Boulevard ¹⁸	Building								
6	401 S Robertson Boulevard ¹⁸	2,496 sf Convenience Market (Open 24 Hours)	401 S Robertson Boulevard	738	34	33	67	27	26	53
City of West Hollywood										
1	Walgreens Mixed-Use Project ¹⁹	15,414 sf Retail Space 18 du Condominium 2 du Apartment <i>(16,681) sf commercial buildings</i>	8120 Santa Monica Blvd	1,018	8	7	15	61	57	118
2	Monarch Fountain & La Brea Mixed-Use Project ¹⁹	187 du Apartment 5,664 sf Convenience Store 7,089 sf Restaurant 2,300 sf Coffee Shop 4,506 sf Bank	1222 La Brea Avenue	2,901	84	132	216	155	120	275
3	1201 La Brea Avenue ¹⁹	4,575 sf Restaurant	1201 La Brea Avenue	412	2	2	4	21	4	25
4	Movietown Mixed-Use Project ¹⁹	32,300 sf Retail 294 du Condominiums 76 du Apartments	7302 Santa Monica Blvd.	1,617	41	122	163	155	94	249
5	The Lot Office/Media Support Project ¹⁹	748 stall Parking Structure	1041 Formosa Avenue	4,450	389	49	438	113	332	445
6	Faith Plating Mixed-Use Project ¹⁹	9,300 sf Retail 133 du Condominiums 33 du Apartments	7144 Santa Monica Blvd.	1,630	24	72	96	88	52	140
7	Santa Monica & La Brea Mixed-Use Project ¹⁹	184 du Apartment 3,300 sf Convenience Store 4,800 sf Restaurant 3,250 sf Pharmacy 2,000 sf Bank	7113 Santa Monica Blvd.	2,368	56	108	164	128	94	222
8	Melrose Triangle Project ¹⁹	70,259 sf Retail / Commercial 195 du Apartments 327,000 sf Storage	9040, 9060, 9080, 9098 Santa Monica Blvd	3,578	193	67	260	123	180	303

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
9	La Peer Hotel Project ¹⁹	69 hotel rooms 8 du Condominiums	623 La Peer Drive	876	28	24	52	36	32	68
10	8687 Melrose Avenue ¹⁹	400,000 sf Office	8687 Melrose Avenue	4,404	546	74	620	93	455	548
11	8650 Melrose Avenue ¹⁹	14,571 sf Retail	8650 Melrose Avenue	693	12	11	23	20	23	43
12	8612 Melrose Avenue ¹⁹	9,998 sf Restaurant	8612 Melrose Avenue	899	4	4	8	50	25	75
13	8583 Melrose Avenue ¹⁹	9,545 sf Retail / Commercial 7 du Apartment	8583 Melrose Avenue	561	16	12	28	22	22	44
14	8564 Melrose Avenue ¹⁹	28,474 sf Retail/Commercial	8564 Melrose Avenue	765	14	9	23	22	27	49

sf = square feet, du = dwelling unit, stu = students, N/A = not available or not applicable

*a – Projects noted in **italics** with (sf in parentheses) are to be removed*

1 Traffic Impact Analysis for a Mixed Use Project located at 6911 Santa Monica Boulevard (Overland Traffic Consultants, Revised February 2008).

2 Traffic Study for The Lexington Development (Fehr & Peers/Kaku Associates, June 2008).

3 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 710 (Office).

4 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on net Project trip distribution in the Traffic Impact Analysis for a Proposed Mixed Use' Project located at the northwest corner of La Brea Avenue and Willoughby Avenue (Overland Traffic Consultants, August 2007).

5 Traffic Impact Study Report for Proposed Office Project at 959 Seward Street (Crain & Associates, March 2007).

6 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 220 (Apartment).

7 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 565 (Day Care Center).

8 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 151 (Mini-Warehouse).

9 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 230 (Residential Condominium/Townhome).

10 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 820 (Shopping Center).

11 Traffic Impact Analysis Report for a Proposed 162-Unit Residential and 6,850 Square Foot Retail/Commercial Mixed-Use Development at 6245 Wilshire Boulevard (Hirsch/Green Transportation Consulting, July 2008).

12 Traffic Impact Study for the Proposed Commercial Project at 5900 Wilshire Boulevard (Crain & Associates, July 2007).

13 Traffic Impact Report for the Proposed Apartment Development at 5500 Wilshire Boulevard (Crain & Associates, August 2005).

14 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 931 (Quality Restaurant).

15 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on net Project trip distribution in the Wilshire and La Brea Project Draft EIR (Los Angeles Department of City Planning & Impact Sciences, August 2008).

16 Net trip generation provided by the LADOT database. Peak-hour directional distribution of trips based on ITE Land Use Code 850 (Supermarket).

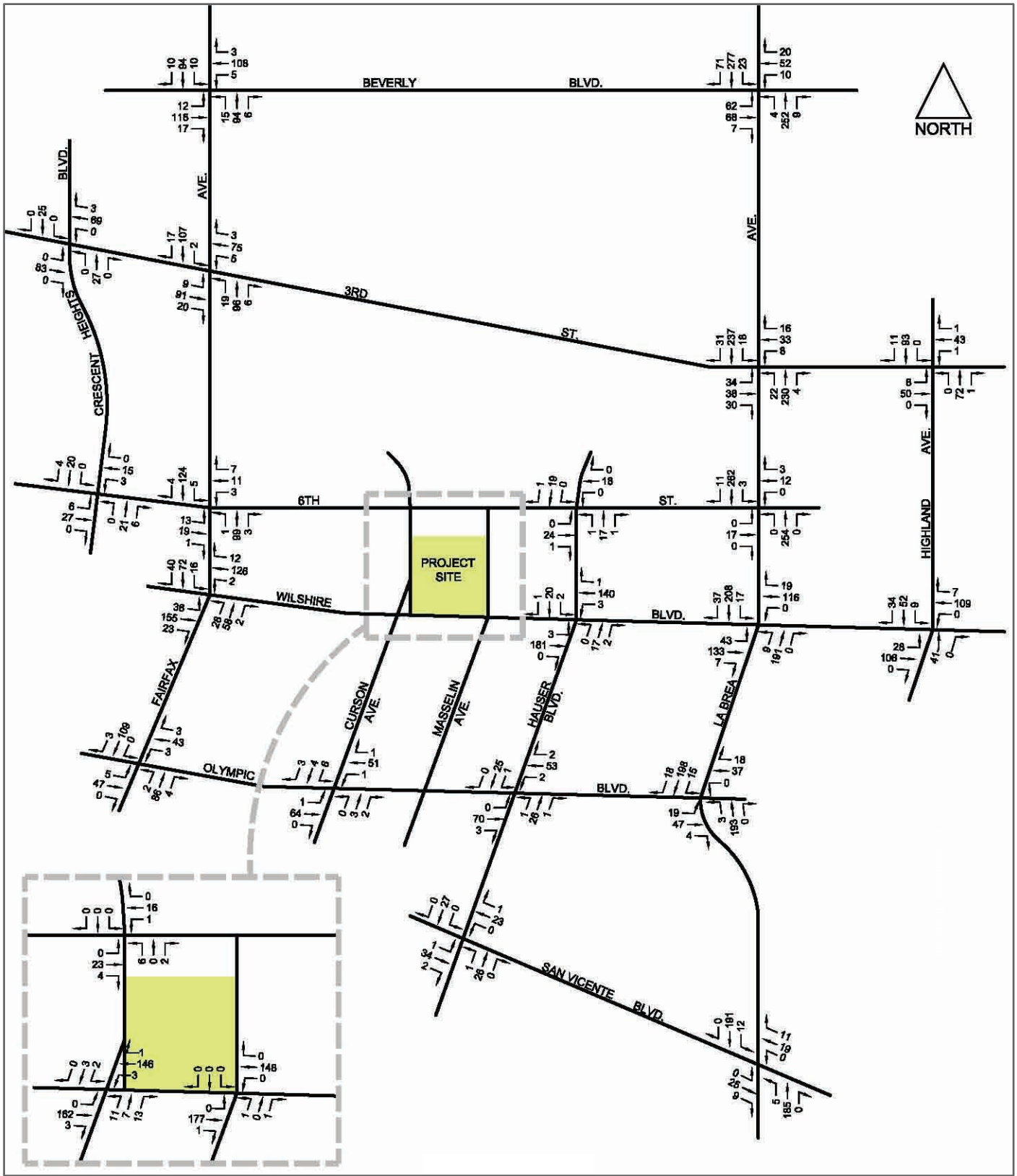
17 Traffic Impact Analysis for a Proposed Residential and Retail Project [Washington Square Redevelopment] (Crain & Associates, April 2009).

**Table IV.I-1
Related Projects Trip Generation Estimates**

Map No.	Project	Size	Location	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
	<p>18 Net trip generation provided by the City of Beverly Hills cumulative projects list.</p> <p>19 Net trip generation provided by the City of West Hollywood cumulative project list.</p> <p>20 According to the Initial Study for the Academy Museum of Motion Pictures (AMMP) project, dated May 2013, the project will consist of numerous uses totaling 229,000 square feet. The AMMP project is expected to be completed no sooner than the year 2017. As the AMMP traffic study is under preparation at this time, its trip generations are unavailable and, therefore, are not presented in the above table or included in the cumulative traffic analysis. It should be noted that the cumulative traffic analysis year for the Proposed Project is 2016, which is when the Proposed Project is expected to be completed and at least one year prior to the completion of the AMMP project. Therefore, an accurate estimation of year 2016 cumulative traffic conditions, without the inclusion of AMMP project trips, has been provided.</p> <p>21 As a transit project this project would not be expected to add trips, but is included for the purposes of cumulative construction traffic analysis.</p> <p>Source: Crain & Associates, 2014.</p>									



Source: Crain & Associates, January 9, 2014.



Source: Crain & Associates, March 12, 2013.

D. Methodology

The traffic analysis was performed through the use of established traffic engineering techniques. The methodology used to determine the Critical Movement Analysis (CMA) and evaluate traffic operations at the study intersections is based on procedures outlined in Circular Number 212 of the Transportation Research Board, consistent with LADOT policies.² This methodology describes the operating characteristics of an intersection in terms of the Level of Service, which is based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometrics, and other factors which determine both the quantity of traffic that can move through an intersection (Volume-to-Capacity (v/c)) and the quality of that traffic flow (Level of Service).

Volume-to-Capacity represents the maximum total hourly volume of vehicles in the critical lanes, which has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movement or groups of movements which exhibit the highest per lane volumes, thus, defining the maximum amount of vehicles attempting to negotiate through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location. The term “Level of Service” (LOS) describes the quality of traffic flow. LOS A through C are indicative of excellent-to-good traffic flow conditions. LOS D corresponds with fair conditions that may experience substantial delay during portions of the peak hours, but without excessive backups. LOS E represents poor conditions, with volumes at or near the capacity of the intersection and long lines of vehicles that may have to wait through several signal cycles. LOS F is characteristic of failure (i.e., the intersection is overloaded, vehicular movements may be restricted or prevented, and delays and queue lengths become increasingly longer).

The intersection capacities for various levels of service, based on the number of traffic signal phases, are shown in Table IV.I-2, Critical Movement Analysis Volume Ranges for Determining Levels of Service. For intersection evaluation and planning purposes, the capacity of an intersection equates to the value of LOS E, which represents the highest level of traffic through urban area intersections that can be adequately accommodated without a breakdown in operation resulting in stop-and-go conditions.

Table IV.I-2
Critical Movement Analysis Volume Ranges for Determining Levels of Service ^a

Level of Service	Maximum Sum of Critical Volumes (VPH)				
	Two Phase	Three Phase	Four or More Phases	2 Way Stop Controlled	4 Way Stop Controlled
A	900	855	825	720	600
B	1,050	1,000	965	840	700
C	1,200	1,140	1,100	960	800
D	1,350	1,275	1,225	1,080	900
E	1,500	1,425	1,375	1,200	1,000
F	Not Applicable				

² The LADOT *Traffic Study Policies and Procedures* (May 2012) require the use of the Critical Movement Analysis (CMA) methodology to analyze signalized intersections.

^{a:} For planning applications only, i.e., not appropriate for operations and design applications. Capacity equates to the value of LOS E.
Source: Crain & Associates, 2013

The Critical Movement indices at an intersection are determined by first identifying the sum of all critical movement volumes at that intersection. This value is then divided by the appropriate capacity value for the type of signal control at the study intersection to arrive at the CMA value for the intersection, which is roughly equivalent to the volume-to-capacity ratio for the location. Intersections operating at LOS A through LOS C provide good traffic flow characteristics, with little or no congestion or vehicle delay. LOS D typically is the level for which a metropolitan area street system is designed, and represents the highest level of smooth traffic flow. LOS E represents volumes at or near the capacity of the intersection and can result in stoppages of momentary duration and unstable traffic flow at the upper reaches of this condition. LOS F occurs when a roadway is overloaded and is characterized by stop-and-go traffic with stoppages of long duration. The LOS definitions do not represent a single intersection operation condition, but rather correspond to a range of CMA values, as shown in Table IV.I-3, Level of Service as a Function of CMA Value.

Table IV.I-3
Level of Service as a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above	>0.60<0.70
C	Light congestion; occasional backups on critical approaches.	>0.70<0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80<0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90<1.00
F	Forced flow with stoppages of long duration.	>1.00
<i>Notes: CMA = Critical Movement Analysis; LOS = Level of Service</i> <i>Source: Crain and Associates, 2013.</i>		

Applying this analysis procedure, the CMA value and corresponding LOS can be calculated for each study intersection for Existing (2013) traffic conditions. These standard CMA calculations are also adjusted to account for signal enhancements not considered in the CMA methodology, including the effects of intersections currently operating under the City's Automated Traffic Surveillance and Control (ATSAC) system or the upgraded Adaptive Traffic Control System (ATCS). ATSAC/ATCS is a highly sophisticated computerized system that continually monitors traffic demand at signalized intersections within the system and modifies signal timing in real time to maximize capacity and decrease overall delay. The ATSAC system has been recognized to increase intersection capacity by approximately seven percent. The upgrade to ATCS is able to increase capacity by an additional three percent, resulting in a total 10 percent increase in intersection capacity. Therefore, per LADOT policy, the standard CMA values were decreased by 0.070 where only the ATSAC system is in effect and by 0.100 where the combined ATSAC/ATCS is in effect. Seventeen of the 24 study intersections are operating with full ATSAC/ATCS signal enhancements currently, while seven of the study intersections have only the ATSAC system in

effect. These seven study intersections are scheduled to be upgraded with full ATSC/ATCS signal enhancements by 2014.

Traffic volumes for existing conditions at the study locations were obtained from manual traffic counts conducted on Tuesday, April 19, 2011 (2 intersections), Tuesday, November 27, 2012 (13 intersections), Wednesday, January 16, 2013 (8 intersections) and Tuesday, June 4, 2013 (1 intersection). In accordance with the current LADOT *Traffic Study Policies and Procedures* (May 2012), the intersection traffic counts for this study were completed on a typical weekday during the morning and afternoon peak commute periods, which range from 7:00 to 10:00 AM and 3:00 to 6:00 PM, respectively.

Peak-hour volumes were determined individually for each intersection based on the highest-volume four consecutive 15-minute periods for all vehicular movements. In order to represent existing conditions in 2013, the traffic counts conducted in 2011 and 2012 were factored upward using a 1.0 percent ambient growth factor, which is consistent with the growth factor approved by LADOT for use in this traffic impact analysis. The existing (2013) AM and PM peak-hour volumes at the study intersections are illustrated in Figures IV.I-4, IV.I-5 and IV.I-6. The intersection count data sheets are provided in Appendix A of the Traffic Study.

The analyses of Existing (2013) AM and PM peak-hour conditions at the study intersections are summarized in Table IV.I-4. As shown in Table IV.I-4, 11 of the 24 study intersections currently operate at LOS C or better during both peak hours, six intersections currently operate at LOS D or better during both peak hours, and the remaining six intersections currently operate at LOS E during one or both peak hours. None of the study intersections currently operate at LOS F during either peak hour. All CMA/LOS calculations were performed using the standard LADOT LOS Worksheet. These CMA/LOS calculation worksheets are included in Appendix C.

**Table IV.I-4
Existing (2013) Intersection Conditions**

No.	Intersection	Peak Hour	CMA	LOS
1	Crescent Heights Boulevard / 3rd Street	AM	0.748	C
		PM	0.603	B
2	Crescent Heights Boulevard / 6th Street	AM	0.635	B
		PM	0.577	A
3	Fairfax Avenue / Beverly Boulevard	AM	0.875	D
		PM	0.848	D
4	Fairfax Avenue / 3rd Street	AM	0.887	D
		PM	0.845	D
5	Fairfax Avenue / 6th Street	AM	0.714	C
		PM	0.679	B
6	Fairfax Avenue / Wilshire Boulevard	AM	0.921	E
		PM	0.759	C
7	Fairfax Avenue / Olympic Boulevard	AM	0.836	D
		PM	0.764	C
8	Curson Avenue / 6th Street	AM	0.511	A
		PM	0.489	A

**Table IV.I-4
Existing (2013) Intersection Conditions**

No.	Intersection	Peak Hour	CMA	LOS
9	Curson Avenue / Wilshire Boulevard	AM	0.611	B
		PM	0.518	A
10	Curson Avenue / Olympic Boulevard	AM	0.643	B
		PM	0.591	A
11	Masselin Avenue / Wilshire Boulevard	AM	0.451	A
		PM	0.477	A
12	Hauser Boulevard / 6th Street	AM	0.652	B
		PM	0.694	B
13	Hauser Boulevard / Wilshire Boulevard	AM	0.611	B
		PM	0.692	B
14	Hauser Boulevard / Olympic Boulevard	AM	0.889	D
		PM	0.789	C
15	Hauser Boulevard / San Vicente Boulevard	AM	0.669	B
		PM	0.657	B
16	La Brea Avenue / Beverly Boulevard	AM	0.945	E
		PM	0.908	E
17	La Brea Avenue / 3rd Street	AM	0.848	D
		PM	0.796	C
18	La Brea Avenue / 6th Street	AM	0.667	B
		PM	0.663	B
19	La Brea Avenue / Wilshire Boulevard	AM	0.757	C
		PM	0.847	D
20	La Brea Avenue / Olympic Boulevard	AM	0.923	E
		PM	0.913	E
21	La Brea Avenue / San Vicente Boulevard	AM	0.983	E
		PM	0.825	D
22	Highland Avenue / 3rd Street	AM	0.980	E
		PM	0.887	D
23	Highland Avenue / Wilshire Boulevard	AM	0.973	E
		PM	0.897	D
24	Martel Avenue / Hauser Boulevard	AM	0.705	C
		PM	0.798	C
<i>Notes: CMA = Critical Movement Analysis; LOS = Level of Service Source: Crain and Associates, 2013.</i>				

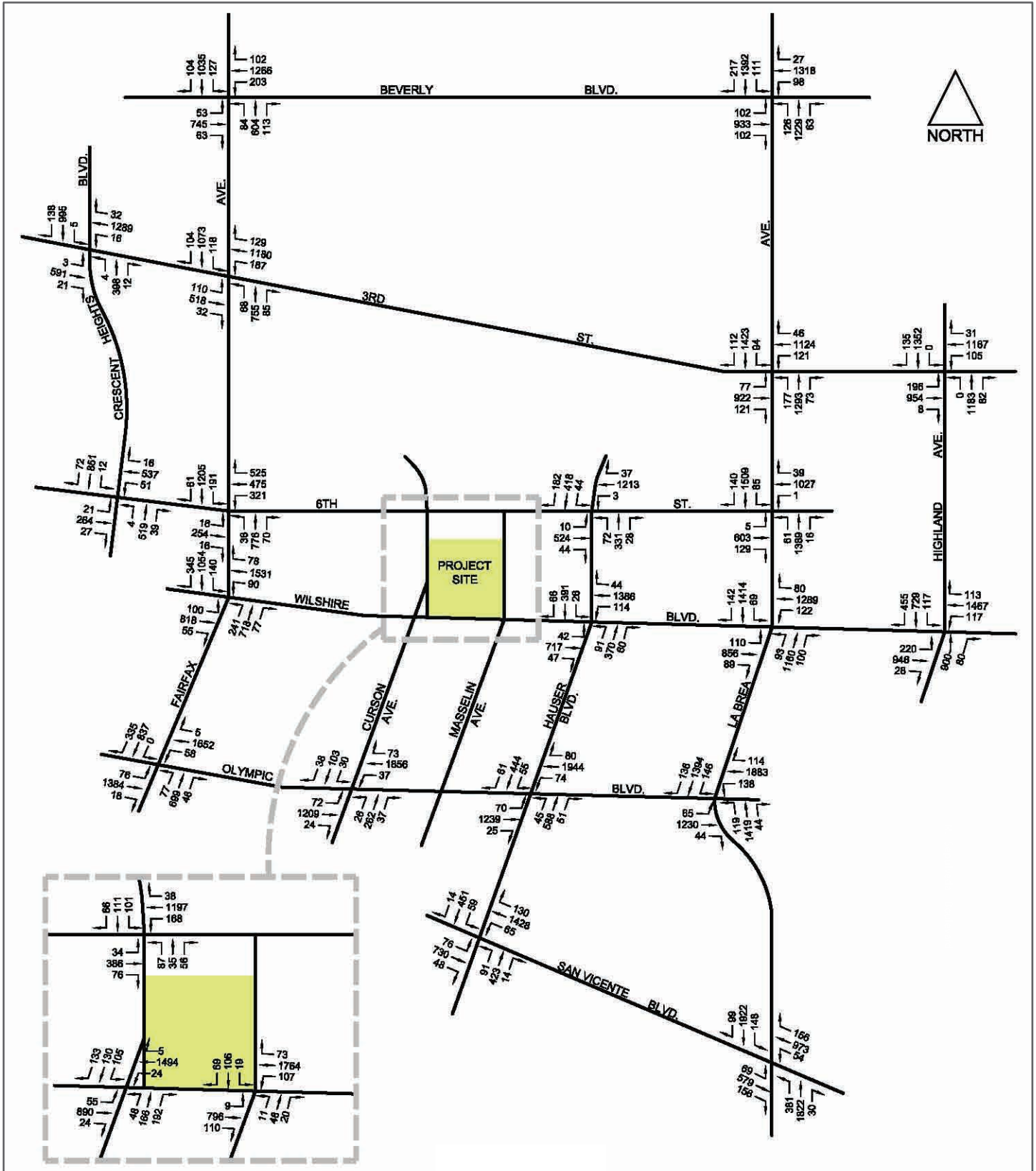
Daily machine traffic counts were conducted on November 27, 2012 for the two residential street segments (Curson Avenue, south of 8th Street and Masselin Avenue, south of 8th Street) that were analyzed. These residential street segments are those most likely to be affected by Project traffic. These count volumes were also increased by 1.0 percent to provide existing daily volumes representative of the existing study year, 2013. The existing residential street volumes are provided in Table IV.I-5.

**Table IV.I-5
Existing (2013) Residential Street Volumes**

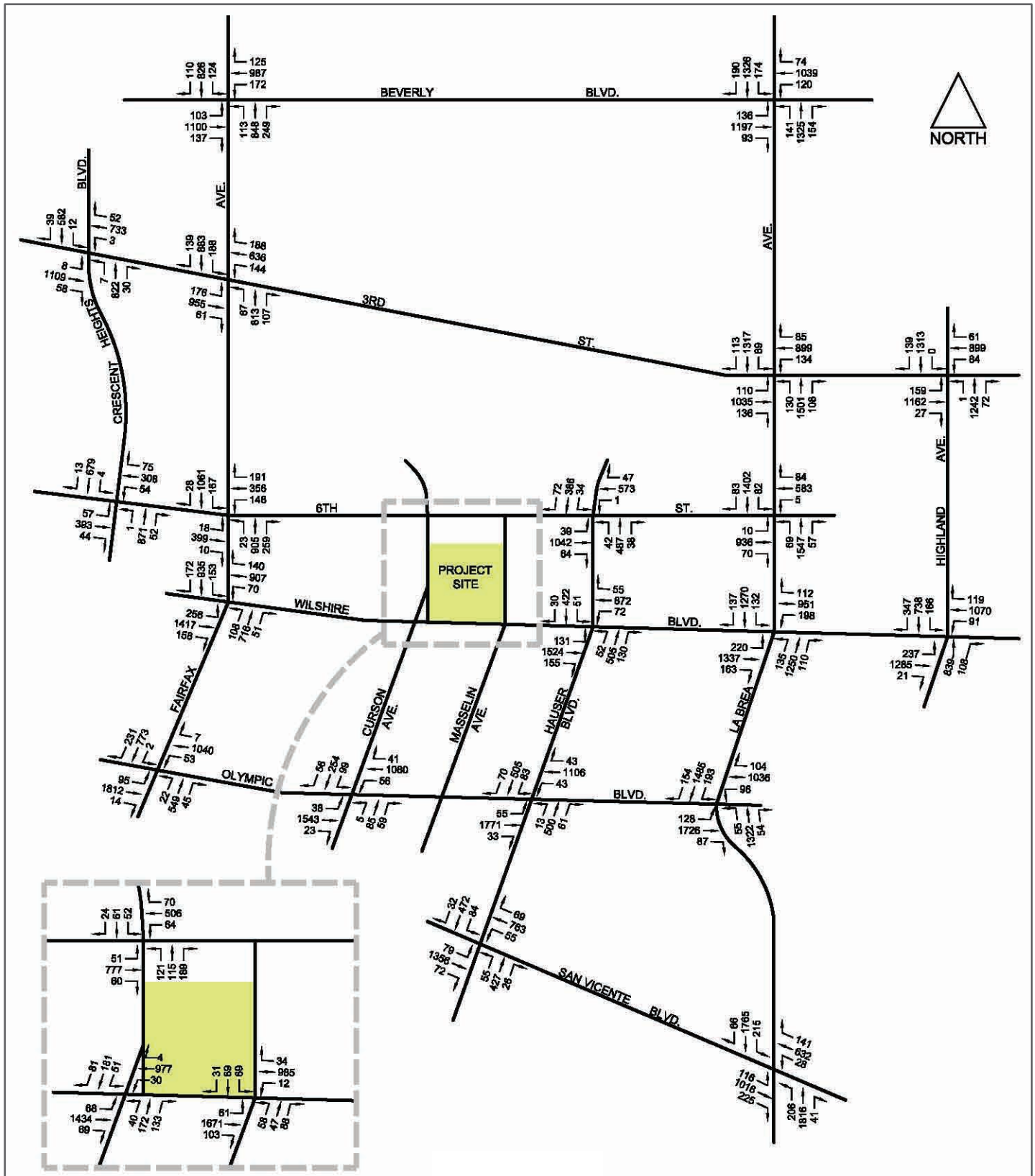
Street Segment	Average Daily Traffic (ADT)			
	Existing (2013)	Project Traffic	Existing (2013) Plus Project	% Project Traffic
Curson Avenue, south of 8th Street	4,919	122	5,041	2.4%
Masselin Avenue, south of 8th Street	1,163	70	1,233	5.7%

Source: Crain and Associates, 2013.

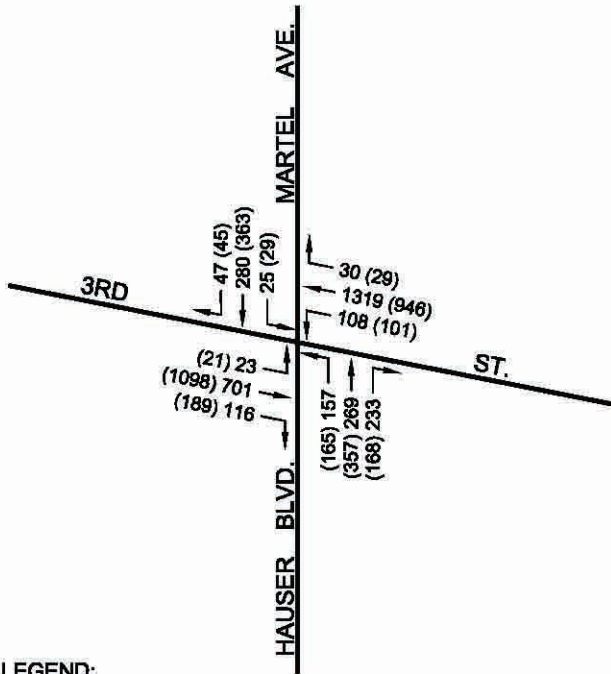
The daily traffic count data sheets are also contained in Appendix A of the Traffic Study. Information pertaining to intersection characteristics, such as geometrics, traffic signal operations, and on-street parking restrictions were obtained from field checks and City engineering plans. The existing lane configurations and traffic control conditions for the study intersections are illustrated in Appendix B of the Traffic Study.



Source: Crain & Associates, March 12, 2013.



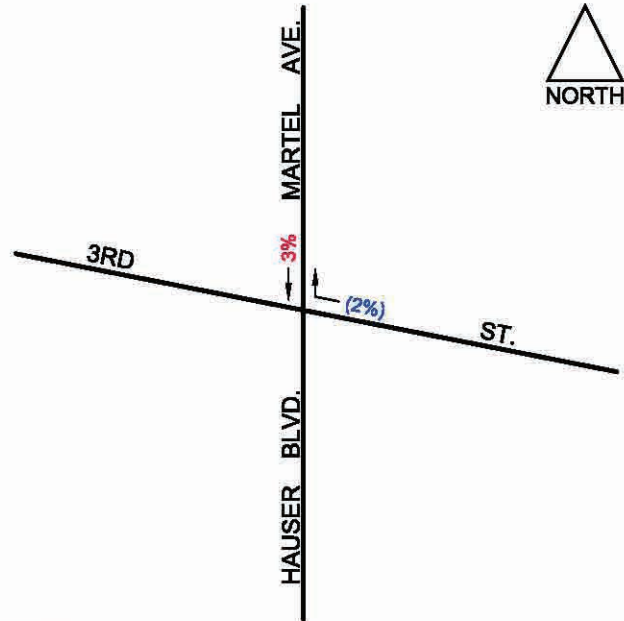
Source: Crain & Associates, March 12, 2013.



LEGEND:

XX - AM VOLUMES
(XX) - PM VOLUMES

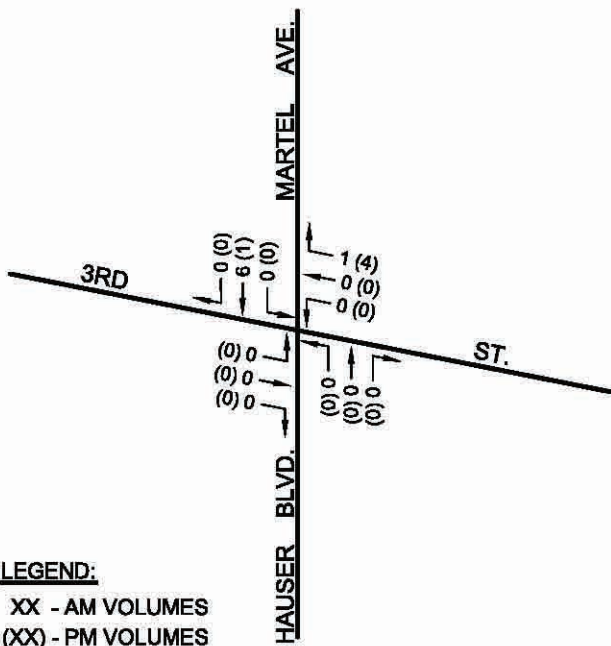
EXISTING (2013) TRAFFIC VOLUMES



LEGEND:

XX% - INBOUND PERCENTAGES
(XX%) - OUTBOUND PERCENTAGES

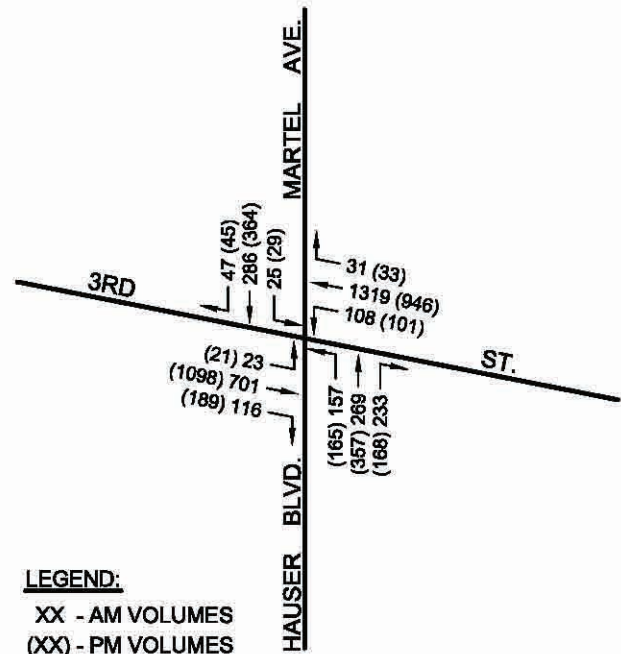
PROJECT TRIP DISTRIBUTION PERCENTAGES



LEGEND:

XX - AM VOLUMES
(XX) - PM VOLUMES

PROJECT ONLY TRAFFIC VOLUMES



LEGEND:

XX - AM VOLUMES
(XX) - PM VOLUMES

EXISTING (2013) PLUS PROJECT TRAFFIC VOLUMES

Source: Crain & Associates, March 12, 2013.



Trip Generation

The traffic-generating characteristics of various land uses have been surveyed and documented in many studies conducted under the auspices of the Institute of Transportation Engineers (ITE). The most recent information is provided in the 9th Edition (2012) of the ITE Trip Generation manual which was used as the basis for calculating the vehicle trips associated with the Proposed Project. Information was obtained from the Trip Generation manual for ITE Land Use Code (LUC) 710 – General Office Building.

Given that the proposed office building would be added to the Museum Square site that already contains an existing office building, with the two buildings sharing site access and parking, the new trips attributable to the Project have been analyzed in conjunction with the existing office building and its trips. It should be noted that the existing office building is approximately 530,000 gross square feet in size, of which approximately 502,175 gross square feet is for office uses and approximately 27,825 gross square feet is for restaurant uses. The restaurants include Starbucks, Baja Fresh, and Mixt Greens establishments, among others. Considering that the restaurant uses advertise to the outside, they were not considered to be ancillary uses to the existing office uses and, therefore, were not included in determining the site trip generation for the combined office uses.

Applying the trip equations from the Trip Generation manual for ITE Land Use Code (LUC) 710, two sets of trip generations were calculated; i.e., one set for the combined square footages of the existing office and proposed office uses, and one set for only the square footage of the existing office use. The difference between the two sets of trip generations provides the baseline daily, AM peak-hour and PM peak-hour trips attributable to the Proposed Project. It should be noted that these baseline calculations do not account for such trip-reducing factors as significant transit usage and/or walk trip potential. As these trip-reducing factors are an important consideration in determining the actual traffic-generating characteristics of a project, adjustments to the baseline trip generations should be included.

The use of public transportation is an important consideration in the evaluation of a project's trip-generating potential. As noted previously in the Existing Public Transportation section of this report, the Project is well served by Metro and LADOT bus lines. These transit operators provide both local and regional routes that are readily accessible to Project employees. Additionally, the forthcoming Wilshire Bus Rapid Transit (BRT) Project, which will convert the existing curb lane along Wilshire Boulevard to bus and right-turn-only operation during the weekday AM and PM peak periods throughout the Project study area, will improve area transit service. Significant transit use is not accounted for in the ITE Trip Generation trip equations. Therefore, the Project trip generation should be adjusted to account for transit usage.

Additionally, "walk-in" trips to and from the Museum Square site are also expected. Given the mix of land uses existing and proposed within the Wilshire Community Plan Area, it is expected that people working, living, and shopping in the area will consider walking between adjacent and nearby developments. Well-situated along the Miracle Mile segment of Wilshire Boulevard and surrounded by residential, recreational, commercial retail, and institutional uses, the Museum Square site is expected to be attractive and conducive to pedestrian traffic. This walk-in patronage will reduce the number of vehicle trips generated by the project. Based on these vehicle trip-reducing factors, a combined transit/walk trip reduction of 15 percent has been applied to the project's baseline trips, as discussed with and approved by LADOT staff.

Based on the trip generation equations and aforementioned trip reduction, the estimated Project trip generations were determined. Table IV.I-6 summarizes the Project trip generation. As shown, it is estimated that the Proposed Project would generate 1,388 net trips per day, including 228 trips during

the AM peak hour and 242 trips during the PM peak hour. These peak-hour trips were used to analyze Project impacts at the study intersections.

**Table IV.I-6
Project Trip Generation**

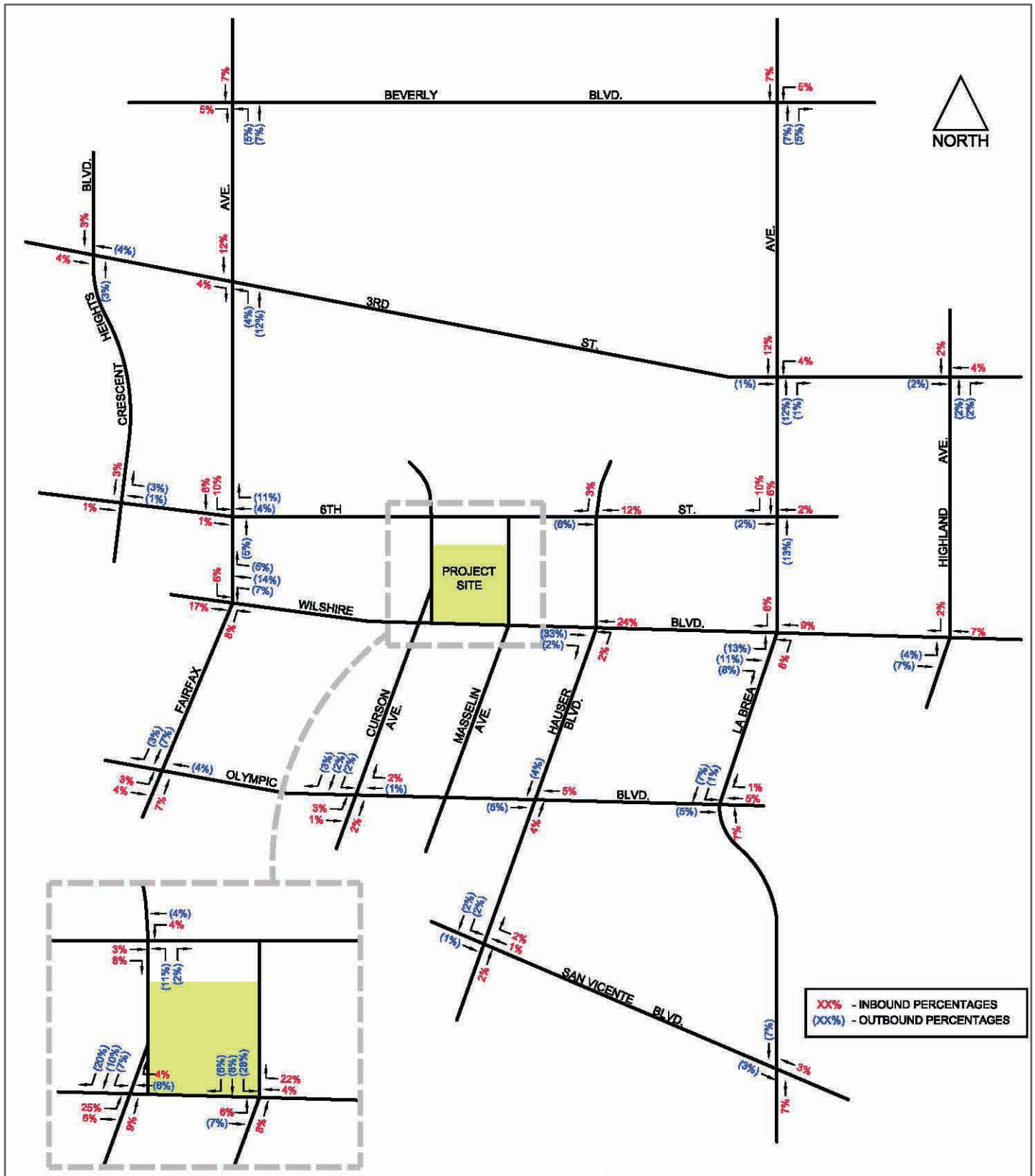
Proposed Use	Size (gsf)	Daily	AM Peak Hour			PM Peak Hour		
			I/B	O/B	Total	I/B	O/B	Total
Proposed Office Building (249,500 sf) + Existing Office Building (502,175 sf), [A]	756,137	6,109	849	116	965	157	768	925
Existing Office Building, [B]	502,175	4,476	612	84	696	109	532	641
Proposed Office Bldg. Trips, [A] - [B]		1,633	237	2	269	48	236	284
Less Transit/Walk Credit	15%	(245)	(36)	(5)	(41)	(7)	(35)	(42)
Net Proposed Office Building Trips		1,388	201	27	228	41	201	242
Notes: gsf = gross square feet, I/B = inbound, O/B = outbound. Source: Crain & Associates, 2013.								

Trip Distribution

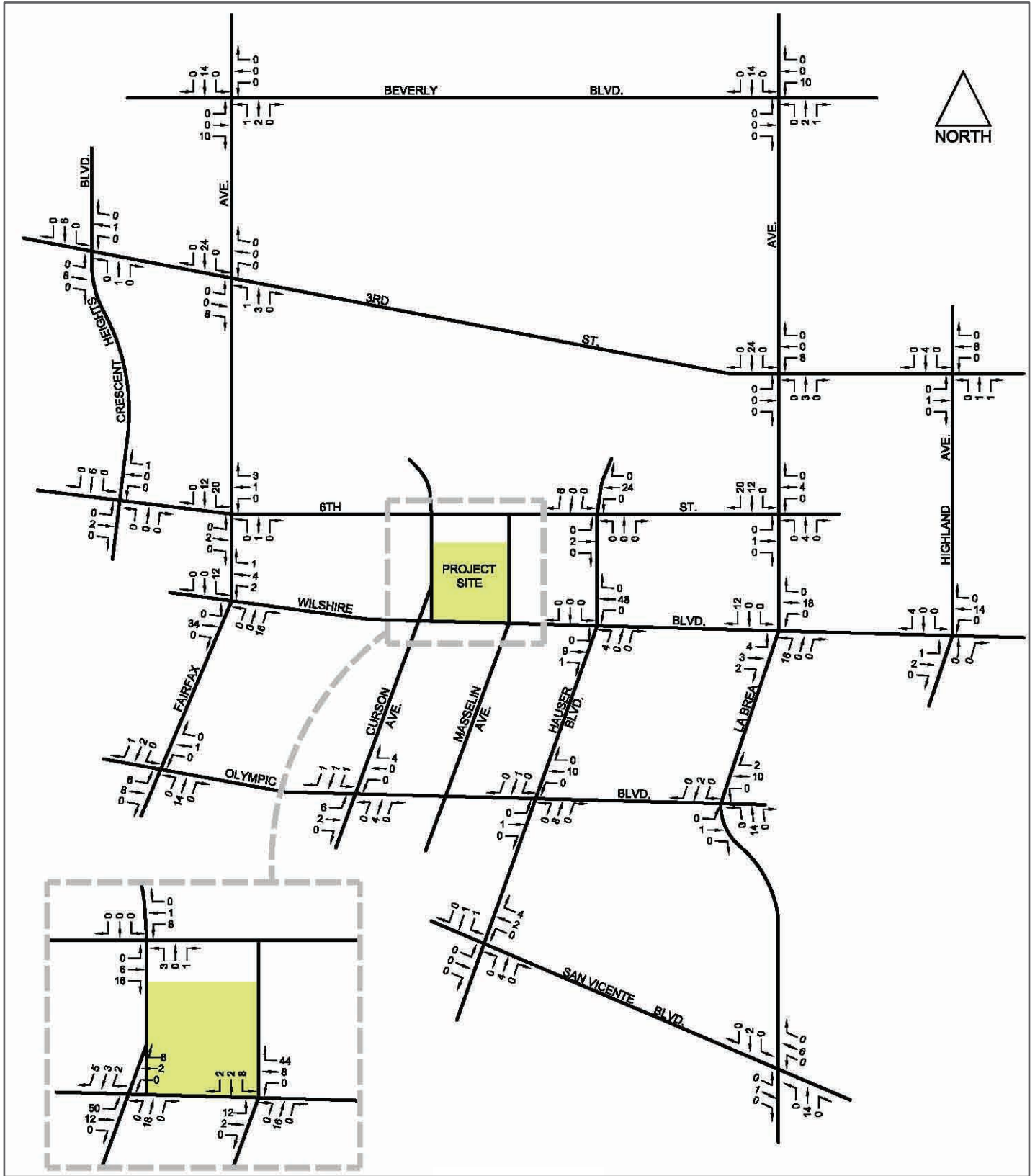
Estimation of the geographic distribution of Project trips was the next step in the analytical process. The primary factors affecting the trip distribution pattern are the nature of the use, existing traffic patterns, characteristics of the surrounding roadway system, geographic location of the Museum Square site and its proximity to freeways and major travel routes, and residential areas from which employees of the Project would likely be attracted. Based on these factors, the overall Project trip distributions were estimated in consultation with LADOT, and are summarized in Table IV.I-7.

**Table IV.I-7
Project Trip Distribution Percentages**

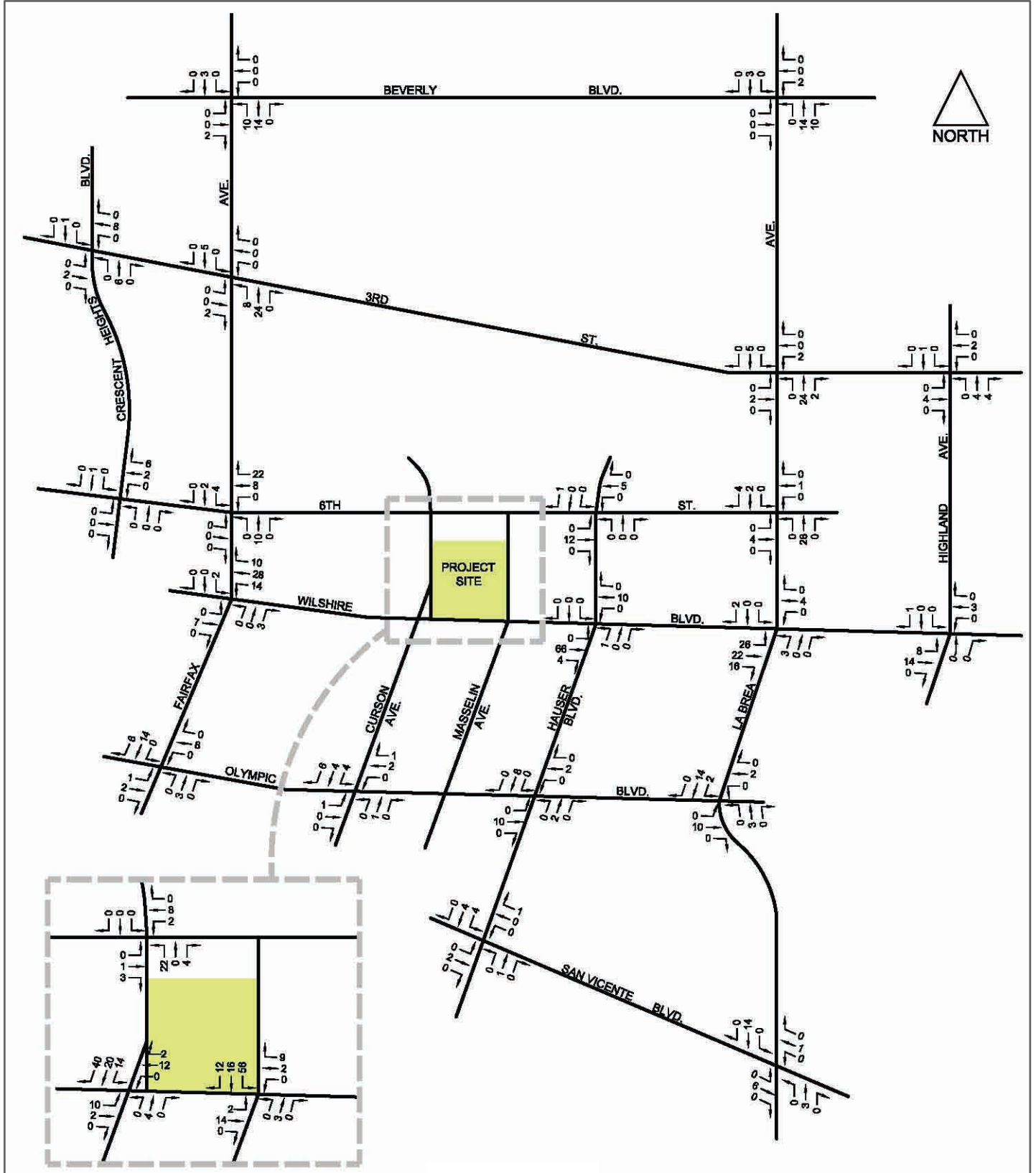
Direction	Project Percentage
North	20
South	23
East	27
West	30
Total	100
Source: Crain & Associates, 2013.	



Source: Crain & Associates, March 12, 2013.



Source: Crain & Associates, March 12, 2013.



Source: Crain & Associates, March 12, 2013.

Project Trip Assignment

The general distribution percentages shown in Table IV.I-7 were then disaggregated and assigned to specific routes and intersections that are expected to be used for Project access. The estimated Project trip assignment percentages at the study intersections were reviewed and approved by LADOT staff and are presented in Figure IV.I-7 and IV.I-6 (for the intersection at Martel Avenue-Hauser Boulevard/3rd Street). Applying these inbound and outbound percentages to the Project trip generation, the traffic volumes for the Proposed Project were determined for the study intersections. These project-only AM and PM peak-hour traffic volumes are depicted in Figures IV.I-8, IV.I-9 and IV.I-6 (for the intersection at Martel Avenue-Hauser Boulevard/3rd Street).

Project Parking and Access

Parking for the Proposed Project would be provided in accordance with the requirements of the City of Los Angeles Municipal Code (LAMC). The Project would provide parking via a surface lot and a multi-level parking structure, both of which exist and would be modified in conjunction with construction of the project. Based on the existing conditions, the existing site parking requirement is 1,468 parking spaces. Under existing conditions, the surface parking lot provides 117 spaces and the parking structure provides 1,373 spaces, for a total of 1,490 spaces. Thus, the existing site parking requirement is satisfied. With the Proposed Project, the existing surface lot would be reduced in size (by 65 spaces) and the parking structure would be increased in size (by 615 spaces) through the addition of two new parking levels. After Project completion, a total of 2,040 parking spaces would be provided on site; an addition of 550 net new spaces.

The Project Applicant will be requesting a variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required under the LAMC for auditorium space. This is consistent with the actual use of the auditorium space and commensurate available parking within the existing garage. The auditorium is not utilized on a regular basis, but rather is used intermittently and generally at off-peak hours, such that more parking is currently required than needed and more than sufficient parking exists. Following the granting of the variance, the total LAMC parking requirement for the Museum Square site would be 1,857 spaces for existing and proposed uses. As a total of 2,040 parking spaces would be provided on site, no off-site parking impacts are anticipated as a result of this Project.

Vehicular access to the Museum Square site parking would remain generally unchanged with construction of the proposed office building. The two full-access driveways intersecting the east side of Curson Avenue, providing access to both the surface lot and parking structure, would continue to be provided. The northerly Curson Avenue driveway would be modified from its existing configuration of dual entry lanes and a single exit lane to provide a single entry lane and dual exit lanes. The full-access driveway and exit-only driveway intersecting the west side of Masselin Avenue, providing access to the parking structure, would continue to be provided. The full-access service/drop-off driveway for the existing office building, also intersecting the west side of Masselin Avenue, would continue to be provided. Another minor change in Project access would be the addition of a drop-off area for the proposed office building along the east side of Curson Avenue, approximately 350 feet north of Wilshire Boulevard.

E. Regulatory Framework

As discussed in Section IV.G, Land Use Planning, the Museum Square site is located in the Miracle Mile community of the City of Los Angeles. As such, the Museum Square site is subject to the applicable transportation policies of several local and regional plans.

Regional Plans and Regulations

2008 Regional Comprehensive Plan

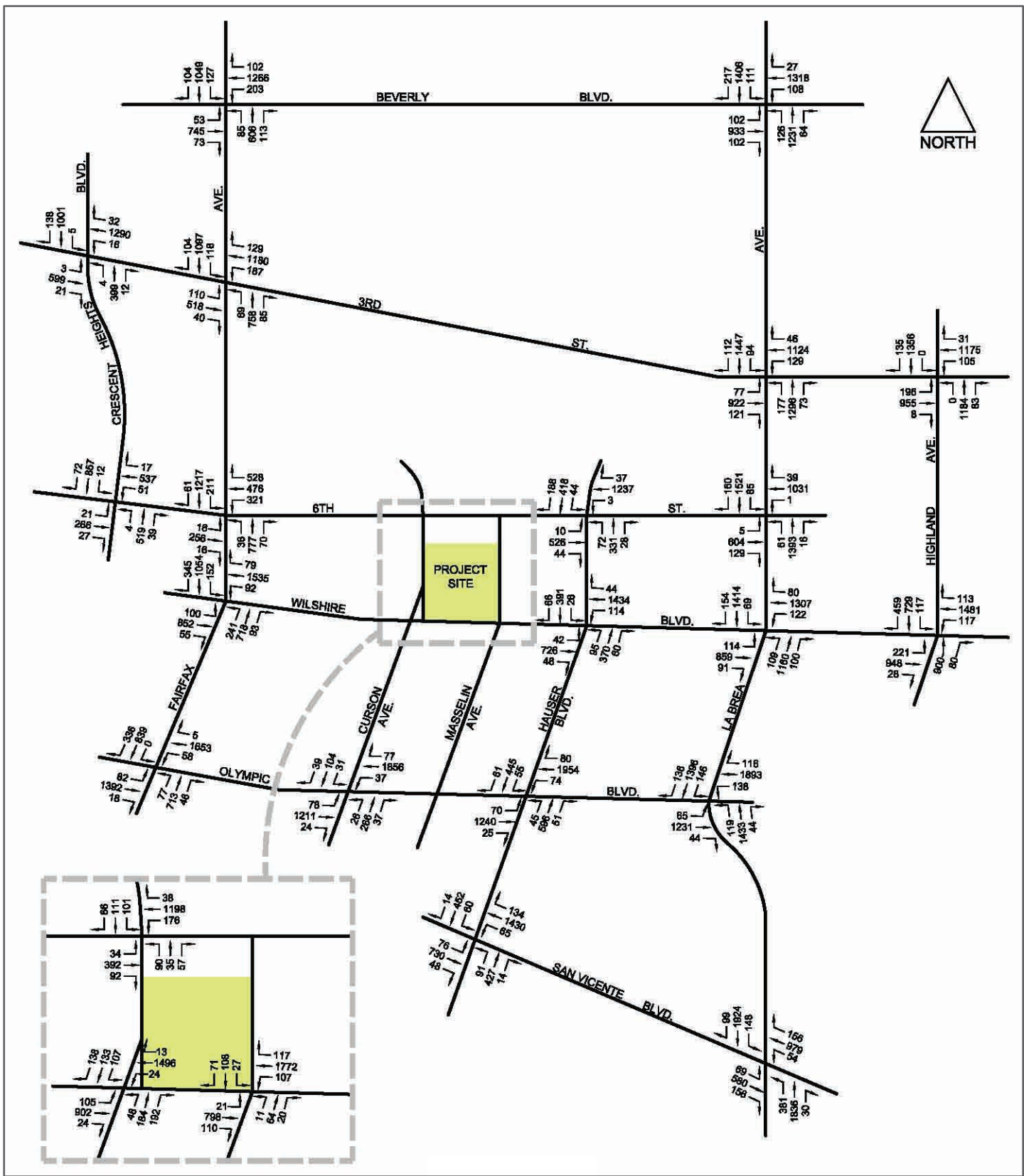
In response to SCAG's Regional Council's 2002 directive in the 2002 Strategic Plan to develop a regional, holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, air quality, and other challenges, the 2008 Regional Comprehensive Plan (RCP) was drafted by SCAG and other key stakeholders.³ The RCP was designed to consider additional steps required to further promote policies that would assist in greening the region, thereby laying the framework for the 2012 update of the Regional Transportation Plan (RTP). The 2008 RCP is closely linked to SCAG's Compass Blueprint and the RTP. The RCP recommends goals, policies, and objectives designed to further integrate resource planning, and is designed to assist local governments with General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP features nine chapters that focus on specific areas of planning and resource management: Land Use and Housing; Open Space and Habitat; Water, Energy; Air Quality, Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. SCAG took action in October 2008 to accept the RCP, which will serve as an advisory document for local governments within the SCAG region. However, it should be noted that while accepted, the RCP has not yet been adopted by SCAG.

2012-2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future

On April 4, 2012, the Regional Council of the Southern California Association of Governments (SCAG) adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future.⁴ The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The RTP/SCS is a multi-modal plan to address the region's transportation system and growth pattern through the year 2035 and beyond. The RTP/SCS provides the basic policy and program framework for long-term investment in the SCAG region's transportation system. New to this RTP, California's Sustainable Communities and Climate Protection Act, or Senate Bill (SB) 375, calls for this RTP to include a Sustainable Communities Strategy (SCS) that reduces greenhouse gas (GHG) emissions from passenger vehicles by 8 percent per capita by 2020 and 13 percent per capita by 2035 compared to 2005, as set by the California Air Resources Board (ARB). SB 375 enhances the State's goals of Assembly Bill 32, the Global Warming Solutions Act of 2006.

³ Southern California Association of Governments, *Regional Comprehensive Plan, 2008*.

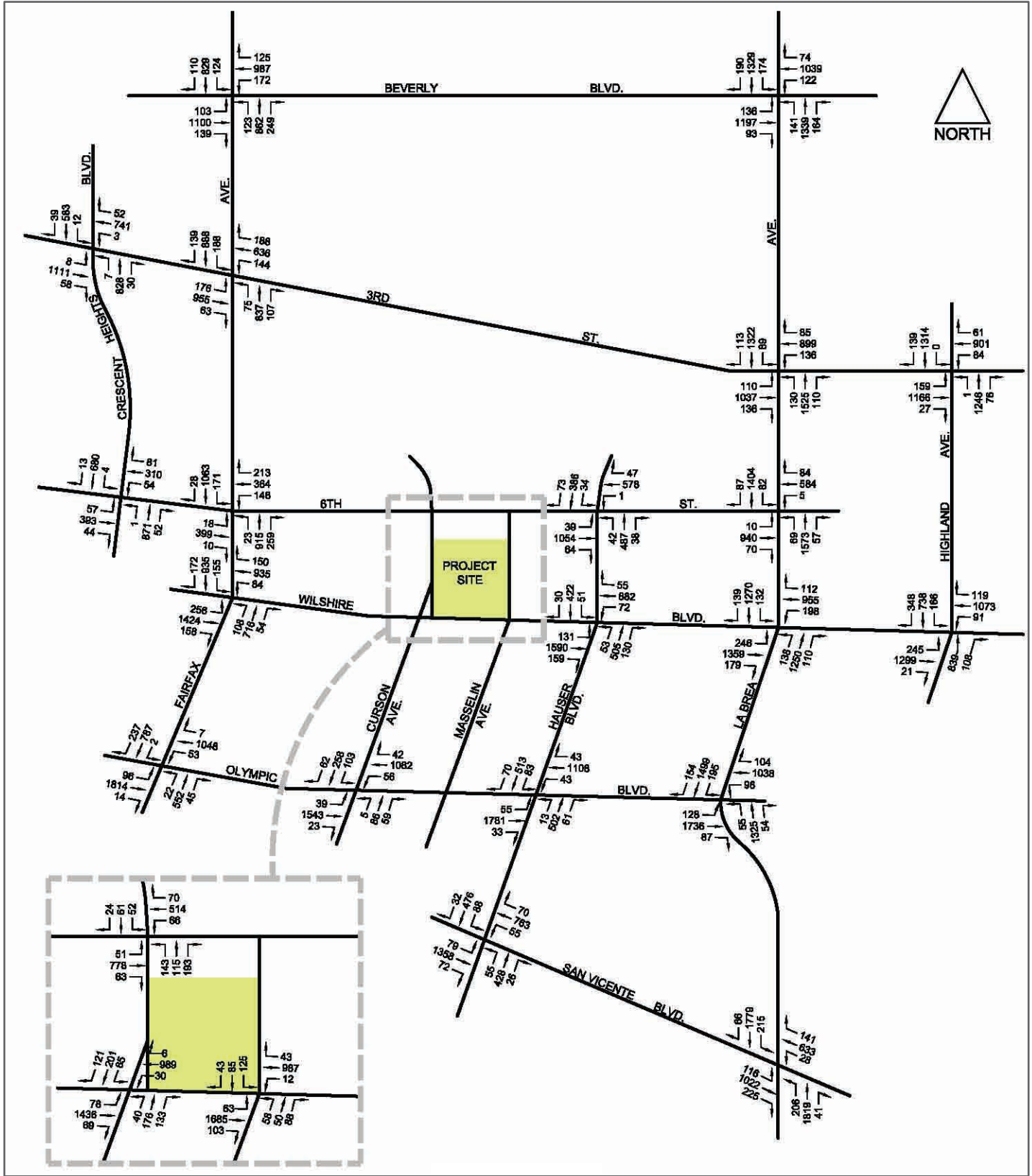
⁴ Southern California Association of Governments, *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future, website: <http://rtpscsc.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>, accessed July 12, 2013.*



Source: Crain & Associates, March 12, 2013.



Figure IV.I-12 Existing (2013) Plus Project Traffic Volumes AM Peak Hour



Source: Crain & Associates, March 12, 2013.

The goals of the RTP/SCS are to maximize mobility and accessibility, ensure safety and reliability, preserve the existing transportation system, maximize productivity of the transportation system, protect the environment, and encourage land use and growth patterns that complement the transportation system. The RTP/SCS contains a host of recommended improvements to our multimodal transportation system. These improvements include closures of critical gaps in the network that hinder access to certain parts of the region, as well as the strategic expansion of our transportation system where there is room to grow in order to provide the region with the mobility it needs.

Congestion Management Program (CMP)

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority (MTA), the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County. The Level of Service at each CMP monitoring station is supervised by local jurisdictions in order to implement the statutory requirements of the CMP. If Level of Service standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan.

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects which are eligible to compete for state gas tax funds. Within Los Angeles, Metro is the designated congestion management agency responsible for coordinating the CMP. The Proposed Project's potential impacts with respect to the CMP are analyzed later in this section.

Local Plans and Regulations

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The City of Los Angeles General Plan (General Plan) addresses community development goals and policies relative to the distribution of public and private land use. The General Plan integrates the citywide elements and community plans, and gives policy direction to the planning regulatory and implementation programs.

Transportation Element

The Transportation Element of the General Plan sets forth goals, objectives, and policies which establish a City-wide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The General Plan states that not all of the policies set forth in the Transportation Element can be achieved in

any given action, and in relation to any specific decision on a Proposed Project.⁵ City decision-makers are to decide how to best implement the adopted policies of this element so as to best serve the health, safety, mobility, and general welfare of the public on a case-by-case basis.

General Plan Framework Element

The City of Los Angeles General Plan Framework Element (the “Framework Element”) is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements.

Transportation

Chapter 8, Transportation, of the Framework Element has a vision that includes a multimodal transportation system that provides choices and accessibility to everyone in Los Angeles. Though this chapter identifies transportation issues; transportation goals, objectives, and policies as well as related implementation programs are set forth in the Transportation Element of the City of Los Angeles General Plan.

3. ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with Appendix G to the State CEQA Guidelines, a significant traffic impact may occur if the Project would result in any of the following conditions:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- 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;
- c) 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;
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- e) Result in inadequate emergency access; or

⁵ *City of Los Angeles General Plan, Transportation Element, first page of Chapter IV. Objectives and Policies.*

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features.

As discussed in section IV.A., Impacts Found to be Less Than Significant of this EIR, the Proposed Project would have no impact or a less than significant impact with respect to Thresholds c) and d) listed above. No further analysis of these topics is required.

City of Los Angeles CEQA Thresholds Guidelines

As set forth in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance levels of impacts of the Proposed Project related to transportation and traffic are determined on a case-by-case basis considering the following factors:

Intersection Impacts

The relative impact of the added Project traffic volumes to be generated by the Proposed Project during the AM and PM peak hours was evaluated based on analysis of future operating conditions at the study intersections, without and with the Proposed Project. The previously discussed capacity analysis procedures were utilized to evaluate the future CMA value and service level characteristics at each study intersection.

The significance of the potential impacts of Project generated traffic at each study intersection was identified using criteria set forth in the LADOT's *Traffic Study Policies and Procedures*, August 2011. According to the City's Sliding Scale Method for calculating the level of impact due to traffic generated by the Proposed Project, a significant transportation impact is determined based on the sliding scale criteria presented in Table IV.I-8 (Intersection Impact Threshold Criteria). No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate traffic increases with little effect on traffic delays.

**Table IV.I-8
City of Los Angeles
Intersection Impact Threshold Criteria**

Final CMA Value	Level of Service	Project Related Increase in CMA Value
> 0.700 - 0.800	C	equal to or greater than 0.040
> 0.800 - 0.900	D	equal to or greater than 0.020
>0.900	E or F	equal to or greater than 0.010

Source: City of Los Angeles Department of Transportation, Traffic Study Policies and Procedures, August 2011.

The City's Sliding Scale Method requires mitigation of Project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection CMA value by an amount equal to or greater than the values shown above.

Residential Street Impacts

Neighborhood residential street impacts are evaluated by LADOT based on the average daily traffic (ADT) along the street segment analyzed. A local residential street shall be deemed significantly impacted based on an increase in the estimated average daily traffic (ADT) volume as indicated in the Table IV.I-9 (Neighborhood Traffic Intrusion Significant Impact Thresholds).

**Table IV.I-9
Neighborhood Traffic Intrusion Significant Impact Thresholds**

Projected ADT With Project (Final ADT)	Related Increase in Final ADT
0 to 999 vpd	120 or more
1,000 to 1,999 vpd	12% or more
2,000 to 2,999 vpd	10% or more
3,000 or more vpd	8% or more
<i>Notes:</i> <i>ADT = average daily traffic vpd = vehicles per day</i> <i>Source: Crain & Associates, 2013</i>	

Freeway Capacity

A Project would normally have a significant freeway capacity impact if Project traffic causes an increase in the demand-to-capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity (D/C increase > 0.02), which causes or worsens LOS F conditions (D/C > 1.00).

Project Access

A Project would normally have a significant impact if the intersection(s) nearest the primary site access is/are Projected to operate at LOS E or F during the AM or PM peak hour, under cumulative plus Project conditions.

Transit System Capacity

The determination of significance shall be on a case-by-case basis considering the projected number of additional transit passengers expected with implementation of the Proposed Project and available transit capacity.

Neighborhood Traffic Construction Impact Significance Criteria

Construction impacts are relatively short-term effects, but there may be situations where such impacts could, nevertheless, be considered significant and should be quantitatively assessed. The LADOT construction traffic impact criterion is as follows:

- A quantitative analysis of construction-related traffic impacts attributable to a project shall be required, provided all of the following criteria have been determined to be applicable:
 - The project is a hillside development where hillside residential streets proximate to the construction site are expected to provide primary access for construction-related traffic;
 - That the duration of the construction period, including site preparation, clearance and/or grading, is expected to exceed 12 months; and
 - That a total of 120 or more average construction-related trips per day (in Passenger Car Equivalents or PCE) are expected to be generated at the site driveway(s) or on the street(s) abutting the site, prior to any mitigation.

The construction period for the Project is expected to exceed 12 months; therefore, a residential street construction trip traffic impact analysis was prepared.

With exception of impacts to residential streets, neither the LADOT nor the *Los Angeles CEQA Thresholds Guide 2006* have established a significance thresholds for traffic impacts resulting from construction activity. Therefore, for the purposes of this analysis, the impact criteria cited above shall also be utilized for impacts associated with traffic generated during construction of the Proposed Project.

Project Impacts

Construction Traffic

Project construction is anticipated to begin shortly after Project approvals are granted, with estimated completion approximately mid-2016. There would be four basic construction phases with an approximate duration of 24 months. These phases are expected to be consecutive, as shown in the estimated schedule below.

Phase 1	Demolition	1 month
Phase 2	Site / Foundation Preparation	6 months
Phase 3	Building Framing	8 months
Phase 4	Finishing	<u>9 months</u>
		24 months

The proposed construction hours would be within the period of 7:00 AM - 9:00 PM, Monday - Friday, and 8:00 AM - 6:00 PM, Saturday, as permitted by City building and noise regulations. Construction activity on Saturday would generally be less intense compared to weekday activity. Some Saturdays would likely have minimal construction activity.

Project construction would generate traffic from construction worker travel, trucks hauling debris generated by on-site demolition activities, trucks delivering construction materials, and minor, miscellaneous activities. Both the number of construction workers and trucks would vary throughout the construction process in order to maintain a reasonable schedule of completion.

Construction Worker Trips

Construction workers would not be allowed to park on public streets in the surrounding area. Construction worker parking would be accommodated in the existing on-site parking structure. Construction workers would also be able to park in the project's additional on-site parking levels after they have been completed. Should these parking facilities be insufficient, arrangements would be made for construction worker parking in other nearby parking facilities, along with supplemental shuttle service as necessary.

It is estimated that the number of construction workers (including management supervisors) would average approximately 105 persons the majority of the time. In general, it is anticipated that the large majority of these workers would arrive at and depart the site during off-peak hours; i.e., arrive prior to 7:00 AM, before the beginning of the heaviest morning commute period, and depart prior to 4:00 PM, before the beginning of the heaviest afternoon commute period. The work force would likely be from

all parts of the Los Angeles region and, therefore, has been assumed to arrive from all directions. Consequently, the impact of construction worker traffic on peak-hour traffic in the vicinity of the Site would be minimal. Given the off-peak nature of construction worker traffic, a less than significant impact is anticipated with regard to the street and freeway systems.

Construction Truck Trips

Construction trucks would not be allowed to stage on public streets. They would also not be allowed to interfere with pedestrian or vehicular traffic, or block access to nearby residences and businesses.

Depending on the specific nature of the construction activity, it is assumed that the majority of truck traffic would be distributed evenly across the workday. It is conservatively estimated that up to approximately 5,000 cubic yards of demolished materials would be transported from the Museum Square site by haul trucks. It is anticipated that hauling would be limited to the weekday six-hour period of 9:00 AM - 3:00 PM, and that during peak hauling operations, there would be up to 20 truckloads per day of demolished materials being transported off-site. This would amount to 3.3 inbound and 3.3 outbound haul truck trips per hour. Assuming a passenger car equivalence (PCE) factor of 2.5, these haul truck trips would be equivalent to approximately eight inbound and eight outbound passenger car trips per hour.

At this time, the location of the site that would be receiving the demolished materials is undetermined, and therefore, it is uncertain which specific route would likely be used by the haul trucks. The Project would be required to obtain approval of a Haul Route Permit by the City's Department of Building and Safety, which would specify the destination site and the route requirements for the haul trucks. It is anticipated that the route for the haul trucks would be oriented toward major arterials and freeways as much as feasible.

For purposes of providing an estimate of haul truck impacts, it is assumed that a haul route candidate would consist of Curson Avenue, Masselin Avenue, 6th Street, Wilshire Boulevard, and La Brea Avenue to and from the I-10 Freeway. Departing the Project Site, it is anticipated that haul trucks would turn right onto Curson Avenue, turn right onto 6th Street, turn right onto Masselin Avenue, turn left onto Wilshire Boulevard and travel eastbound to La Brea Avenue, and turn right onto La Brea Avenue and travel southbound to the I-10 Freeway. Returning to the Site, it is anticipated that haul trucks would travel northbound on La Brea Avenue from the I-10 Freeway to Wilshire Boulevard, turn left onto Wilshire Boulevard and travel westbound, and turn right onto Curson Avenue. This routing pattern would minimize left turns by the haul trucks, which would lessen delay to the haul trucks and overall traffic. Assuming a haul truck peak generation of 8 inbound and 8 outbound PCE trips per hour, it is estimated the haul truck impacts at the six study intersections along the candidate haul route would be as follows:

Table IV.I-10
Critical Movement Analysis (CMA) & Level of Service (LOS) Summary
Haul Truck Construction Traffic - Future (2016) Conditions

No.	Intersection	Peak Hour	Without Construction		With Construction		Impact
			CMA	LOS	CMA	LOS	
9	Curson Avenue / Wilshire Boulevard	AM	0.846	D	0.846	D	0.000
		PM	0.763	C	0.763	C	0.000
11	Masselin Avenue / Wilshire Boulevard	AM	0.699	B	0.707	C	0.008
		PM	0.723	C	0.728	C	0.005
13	Hauser Boulevard / Wilshire Boulevard	AM	0.841	D	0.844	D	0.003
		PM	0.930	E	0.933	E	0.003
19	La Brea Avenue / Wilshire Boulevard	AM	1.032	F	1.037	F	0.005
		PM	1.117	F	1.123	F	0.006
20	La Brea Avenue / Olympic Boulevard	AM	0.994	E	0.996	E	0.002
		PM	0.984	E	0.986	E	0.002
21	La Brea Avenue / San Vicente Boulevard	AM	1.030	F	1.032	F	0.002
		PM	0.822	D	0.885	D	0.003

Source: Crain & Associates, 2013

As shown in Table IV.I-10, and based on the City's significant intersection impact criteria, the traffic impacts of the haul trucks would be less than significant.

Trucks would also be delivering construction materials to the Project Site. It is assumed that weekday deliveries would be restricted to the 11-hour period of 7:00 AM - 6:00 PM. It is estimated that the number of truck deliveries would average 30 per day the majority of the time, with up to 50 deliveries per day on peak occasions. At peak times, there would be approximately 4.5 inbound and 4.5 outbound delivery truck trips per hour. Applying the PCE factor of 2.5, these trips would be equivalent to approximately 11 inbound and 11 outbound passenger car trips per hour. Extrapolating the impact results of the preceding haul truck analysis, and assuming that the delivery trucks would travel the same route, it is estimated that the impacts of the delivery trucks at the six study intersections would also be less than significant. If the delivery trucks access the Museum Square site via more than one route, their trips would be more dispersed, further reducing the potential for significant impacts.

While there may be occasions when haul truck and delivery truck activities would be concurrent, those occasions would be minimal and sporadic, and would be managed to balance truck flow into and out of the Project Site, and to minimize disruptions to the street system.

Miscellaneous Trips

In addition to the trips generated by construction workers and trucks, a nominal amount of miscellaneous trips would be generated by visitors, vendors, inspectors, small delivery vehicles (e.g., UPS and Federal Express), and lunch vans. It is anticipated that these miscellaneous trips would typically average 20 inbound and 20 outbound trips per day, and would generally occur during off-peak traffic hours and have no significant impact.

Emergency Access

Short-term, construction activities, such as lane closures, sidewalk closures and utility line construction, could have implications with regard to response times for emergency vehicles. Other implications of construction include reduced travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Site.

Construction access and activities would be primarily located on Curson Avenue, a Collector Street between Wilshire Boulevard and 6th Street. It is not anticipated that the construction activities would impede any pass-through emergency vehicles or other traffic, as one travel lane in each direction on Curson Avenue would be maintained at all times. There would be no street closures, and access to the Museum Square site and nearby uses would be provided at all times. Since no blockage or significant slowing of emergency vehicles is anticipated, the construction activities would constitute a less than significant impact relative to emergency access. Furthermore, traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. With coordination between Project construction managers and the agencies providing emergency service, the potential impact of construction on emergency access would be reduced to a less than significant level.

Westside Subway Extension (Purple Line) Project

The Westside Subway Extension Project (the “subway project”) includes two stations within approximately 0.4 to 0.5 miles of the Proposed Project. The two stations, Wilshire/La Brea and Wilshire/Fairfax, are to be constructed during Phase 1 of the subway project. Based on current information on the Metro website, as of summer 2013, construction of Phase 1 is scheduled to begin sometime in 2014 and be completed sometime in 2023. Construction-related transportation impacts for the Wilshire/La Brea and Wilshire/Fairfax Stations, as well as the other stations, were discussed and evaluated in Section 3.8 of the Final EIS/EIR for the subway project.

Section 3.8.2 discussed the traffic- and circulation-related impacts resulting from this construction. These impacts would be associated with contractor work and storage areas; stations; crossovers; mining entry/exit locations; tunnel boring machine operations and support activities; truck haul routes; transportation of oversized construction materials; station entrances; station appendages; grout injection; and drop holes. This section specifically evaluated impacts due to the following:

- o Truck Haul Routes (location, length, overlaps, truck trips, and land uses)
- o Traffic Handling (traffic lane requirements, temporary street closures and detour routes, construction-related effects on emergency vehicle access, and access and impacts on commercial driveways)

Section 3.8.3 of the Final EIS/EIR evaluated construction-related impacts/consequences related to public transit.

Section 3.8.4 of the Final EIS/EIR evaluated construction-related impacts/consequences related to parking. It may be necessary to prohibit on-street parking when traffic lanes are closed or temporarily eliminated. Existing on-street parking and loading zones will be temporarily removed for the duration of construction. Parking meters within traffic control zones and affected by construction will be removed or covered, as directed by the agency having jurisdiction.

Section 3.8.5 of the Final EIS/EIR evaluated construction-related impacts/consequences related to pedestrian and bicycle access.

The Final EIS/EIR determined that transportation impacts due to the subway construction would be significant and unavoidable where they result in substantial increase in traffic delay or degradation in levels of service for traffic operation or alternatives modes. Measures to mitigate these impacts, which are fully described in Section 3.8.6 of the Final EIS/EIR, include the following:

- o Traffic and Circulation Mitigation Measures
 - Traffic Control Plans
 - Designated Haul Routes
 - Emergency Vehicle Access
 - Transportation Management Plan
 - Coordination with Planned Roadway Improvements
- o Public Transit Mitigation Measures
 - Temporary Bus Stops and route Diversions
- o Parking Mitigation Measures
 - Parking Management Program
 - Parking Monitoring and Community Outreach
 - Construction
 - Worker Parking
- o Pedestrian and Bicycle Mitigation Measures
 - Pedestrian Routes and Access
 - Bicycle Paths and Access

With the implementation of the above mitigation measures, the Final EIS/EIR concluded that the adverse transportation effects related to the subway construction would be reduced for adjacent commercial and residential neighborhoods. Although the majority of the construction impacts on traffic and circulation, transit, pedestrians, and bicycles would be temporary, impacts and/or residual impacts after mitigation would remain significant and unavoidable during the construction period.

Concurrent Project Construction with the Westside Subway Extension (Purple Line) Project and the Academy Museum of Motion Pictures Project

The Proposed Project is of much smaller scale than the subway project and will be completed within a much shorter time frame. As previously discussed and analyzed, the Proposed Project's construction-related impacts would be less than significant. It is possible that the construction periods for Metro Rail and the Academy Museum of Motion Pictures ("AAMP") project could overlap with the construction of the Proposed Project. In the event of concurrent construction activity involving the AAMP project, Metro Rail project and Proposed Project, cumulative traffic impacts would be significant and unavoidable during the construction period as described in the Metro Rail EIS/EIR and the Proposed Project would contribute incrementally to this impact. Traffic conditions and facilities in the vicinity of Wilshire Boulevard, La Brea Avenue, Fairfax Avenue and other nearby streets would be cumulatively and more severely impacted during periods when these construction activities are concurrent. To avoid substantial inconvenience and disruption as much as feasible, the Construction Staging and Traffic Management Plan, as described below under "Project Design Features" for the Proposed Project, as well as a similar plan that would be required for the AAMP project by the City, will take into account and be coordinated with other construction traffic management plans in the vicinity. In addition, Metro will implement the measures outlined in the Final EIS/EIR to minimize impacts during the construction of the subway project. However, even with implementation of the maximum feasible mitigation measures, cumulative construction traffic impacts would be temporarily significant and unavoidable in the event of concurrent construction of these three projects.

Other Impacts

There would be no striping changes to Curson Avenue to allow storage of construction equipment and materials on the street, as all such items would be stored on-site.

Construction fencing would be installed along most of the Project perimeter. It is possible that the sidewalk on the east side of Curson Avenue between Wilshire Boulevard and 6th Street would be closed. In that case, pedestrians would be directed to use the sidewalk on the west side of Curson Avenue, which would be facilitated by the signals and crosswalks at the intersections of Wilshire Boulevard and Curson Avenue, and 6th Street and Curson Avenue.

Project Design Features

Although no significant construction traffic impacts are anticipated, the Applicant has committed to the following Project Design Features during Project construction to maintain pedestrian and vehicular safety, and to avoid substantial inconvenience to pedestrians, motorists, transit service, residents, businesses and driveway access proximate to the Project Site.

- PDF-TRA-1.** A Construction Staging and Traffic Management Plan (CSTMP) shall be prepared for approval by LADOT and other appropriate agencies, and implemented during Project construction. The CSTMP shall describe the traffic control measures and devices to be implemented for the various construction phases, along with any sidewalk closures, traffic lane closures, temporary walkway installations, K-rail installations, temporary traffic lane modifications, temporary signal modifications, etc. The CSTMP shall also include the name and phone number of a construction project manager who can be reached 24 hours a day regarding construction complaints or emergency situations. In addition, the CSTMP shall take into account and be coordinated with other construction

traffic management plans that may be in effect or have been proposed for other projects in the vicinity.

- PDF-TRA-2.** In the event that any portion of the sidewalk along the east side of Curson Avenue between Wilshire Boulevard and 6th Street is closed due to Project construction, appropriate signage shall be installed directing pedestrians to use the sidewalk along the west side of Curson Avenue, and to cross Curson Avenue at the signalized intersections with Wilshire Boulevard and 6th Street.
- PDF-TRA-3.** Construction vehicles, including construction worker vehicles, shall not park on public streets within one-half mile of the Project Site.
- PDF-TRA-4.** Construction worker parking will be accommodated in the existing on-site parking structure and in the project's additional on-site parking levels after they have been completed. Should these parking facilities be insufficient, arrangements will be made for construction worker parking in other nearby parking facilities, along with supplemental shuttle service as necessary.
- PDF-TRA-5.** Construction vehicles shall not stage on public streets, or stage or queue where they interfere with pedestrian or vehicular traffic, or block access to nearby residences or businesses.
- PDF-TRA-6.** One northbound and one southbound travel lane on Curson Avenue between Wilshire Boulevard and 6th Street shall be maintained at all times.
- PDF-TRA-7.** An adequate number of flag persons in adequate number shall be provided to minimize impacts to traffic flow, and to ensure safe access into and out of the project site.
- PDF-TRA-8.** To the extent feasible, the delivery of construction materials shall be scheduled during off-peak traffic periods.
- PDF-TRA-9.** Heavy-duty construction vehicles, except haul trucks, shall arrive at the Museum Square site no sooner than 7:00 AM and depart no later than 6:00 PM.
- PDF-TRA-10.** The hours, operation and route for haul trucks shall be determined and approved by the City's Department of Building and Safety.

Operational Traffic

Related Projects

For the analysis of Future (2016) Without Project traffic conditions, each related project's trip generation was distributed and assigned to the study area circulation system, using methodologies similar to those previously described for the Proposed Project trip distribution and assignment. Summing the individual related Project traffic volume assignments, the total related Project traffic volumes at the study intersections were calculated and are shown in Figures IV.I-4 and IV.I-5 for the AM and PM peak hours, respectively.

It should be noted that the inclusion of these related projects, as described, results in future (2016) traffic condition forecasts that are conservative for the purposes of impact analysis. As stated previously, the 1.0 percent ambient traffic growth factor, approved by LADOT, accounts for the general traffic growth expected throughout the study area.

The overlay of traffic volumes resulting from the 46 identified related projects represents a conservative projection of future traffic volumes. There is the likelihood that some of the identified projects will not proceed or be constructed as described. It is also probable that some of these projects will be delayed in their construction beyond the future (buildout) study year of the Proposed Project. In addition, none of the mitigation measures proposed in the traffic analyses performed for these related projects have been assumed under future conditions. Therefore, the future condition of the study area roadway infrastructure has also been forecast conservatively.

Highway System Improvements

In order to better analyze future traffic conditions in the Project area, an investigation regarding relevant future transportation improvements to the roadway system infrastructure in the study area was conducted. A number of traffic improvements were identified as scheduled for implementation in order to make more efficient and effective use of the existing street system.

All of the study intersections currently operating on the City's ATSAC system only are scheduled to be upgraded with ATCS enhancements by 2014. As described in a previous section, the ATSAC/ATCS signal enhancements have been recognized to increase intersection capacities by approximately ten percent at locations where they have been installed. These intersection capacity improvements have been incorporated into the analysis of future (2016) traffic conditions.

In addition to these traffic signal enhancements, the Wilshire Bus Rapid Transit (BRT) Project has been formally approved and is scheduled to be constructed and operational by the end of 2015. As part of the Wilshire BRT Project, the existing curb lane along Wilshire Boulevard would be converted to bus and right-turn-only operation during the weekday AM (7:00 to 9:00 AM) and PM (4:00 to 7:00 PM) peak periods throughout the Project study area. These geometric lane changes to the eastbound and westbound approaches to the six study intersections along Wilshire Boulevard have been included in the future (2016) traffic conditions analysis and are depicted in Appendix B of the Traffic Report.

A review of the current City of Los Angeles Capital Improvement Program (CIP) and Bureau of Engineering Street Improvement Master Schedule did not reveal any other improvement projects that would significantly affect operations at the study intersection locations.

Analysis of Future (2016) Traffic Conditions

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described previously in this report. As described earlier, for the analysis of future Project traffic impacts, the aforementioned highway system improvements were incorporated where appropriate. At study locations where no improvements to lane geometries were identified, existing roadway geometric characteristics were assumed to prevail.

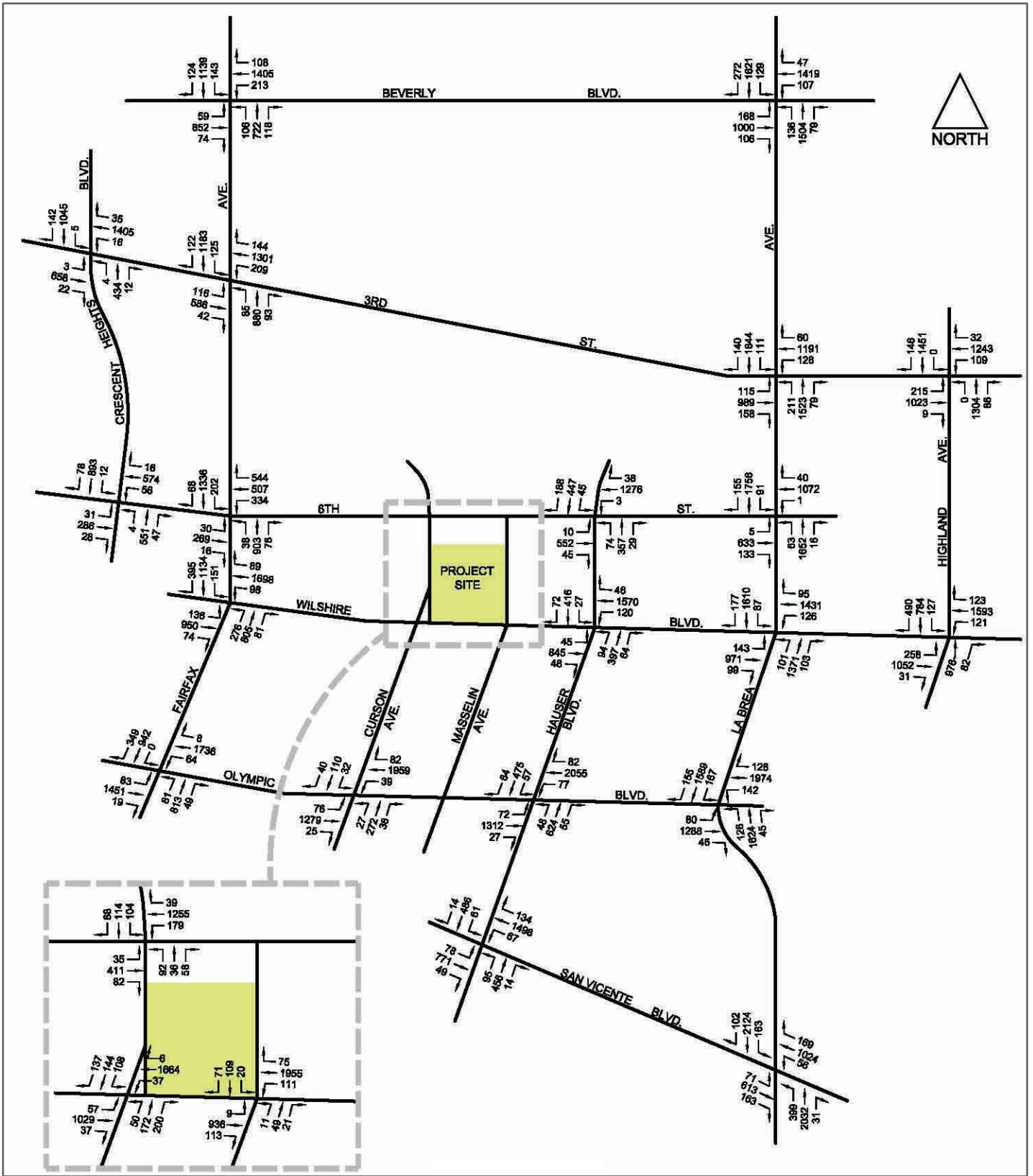
The Existing Plus Project traffic volumes were determined by superimposing the project-only traffic volumes onto the Existing (2013) traffic volumes. The Existing (2013) Plus Project traffic volumes at the study intersections are shown in Figures IV.I-10, IV.I-11 and IV.I-5 (for the intersection at Martel Avenue-Hauser Boulevard/3rd Street) for the AM and PM peak hours, respectively.

As previously discussed, future (2016) baseline traffic volumes for the Without Project condition were determined by superimposing area-wide ambient traffic growth and the total related projects traffic

volumes onto the existing (2013) traffic volumes. The Future (2016) Without Project traffic volumes are depicted in Figures 10(a) and 10(b) for the AM and PM peak hours, respectively.

Project volumes [Figures IV.I-6, IV.I-7 and IV.I-8], as determined earlier, were then added to the Future (2016) Without Project traffic volumes to develop the Future (2016) With Project volumes. The Future (2016) With Project volumes were then used to determine traffic impacts directly attributable to the Proposed Project. The Future (2016) With Project AM and PM peak-hour traffic volumes are shown in Figures 11(a) and 11(b), respectively.

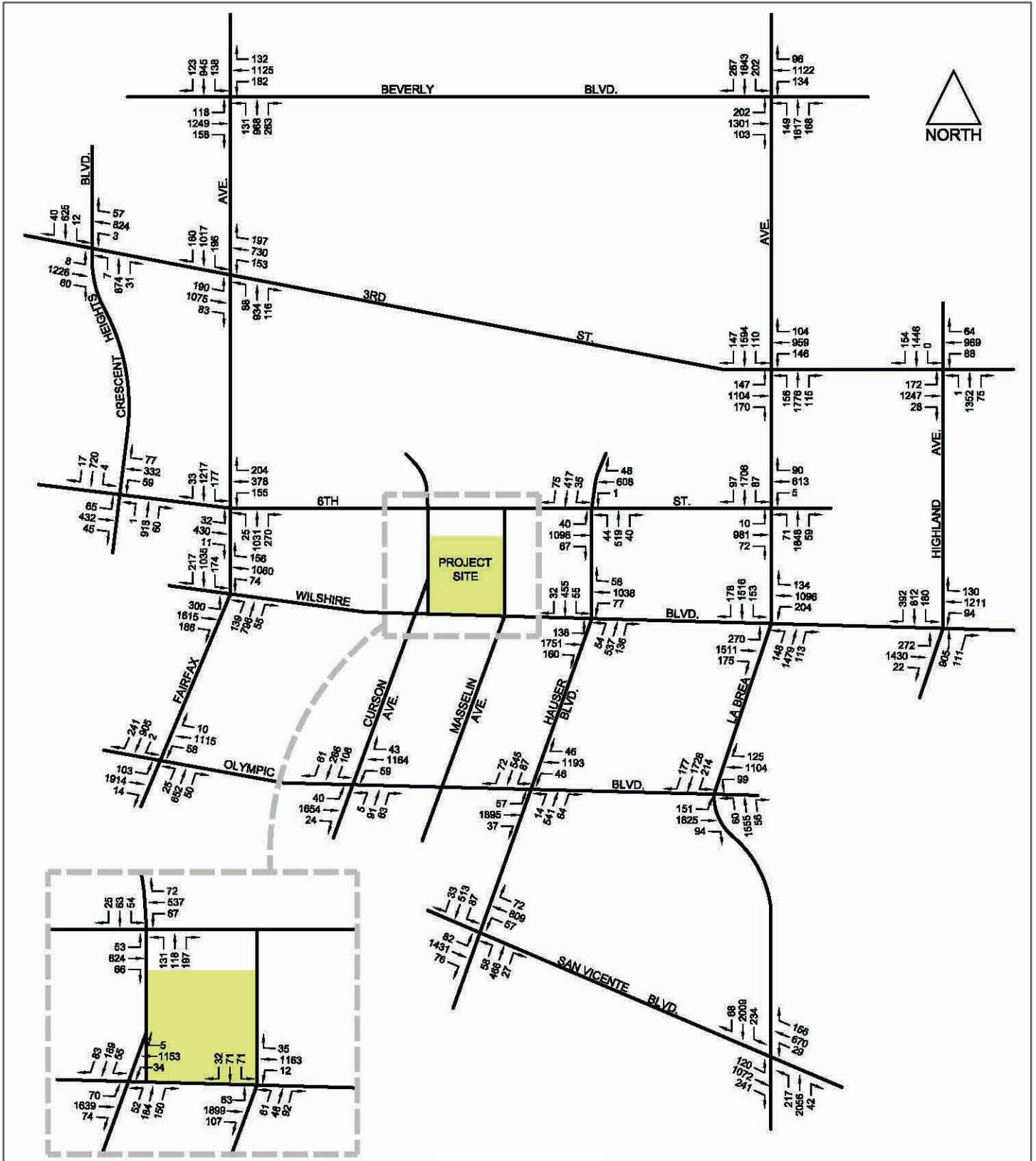
The results of the analysis of existing and future traffic conditions at the study intersections are summarized in Table IV.I-11. As shown in Table IV.I-11, the addition of Project related traffic to existing traffic conditions would deteriorate the LOS at four study intersection during the PM peak hour. No deterioration in LOS would occur during the AM peak hour. Under Existing (2013) Plus Project conditions, 12 of the 24 study intersections would operate at LOS C or better during both peak hours, six intersections would operate at LOS D or better during both peak hours, and the remaining six intersections would operate at LOS E during one or both peak hours. None of the study intersections would deteriorate to LOS F operations during either peak hour.



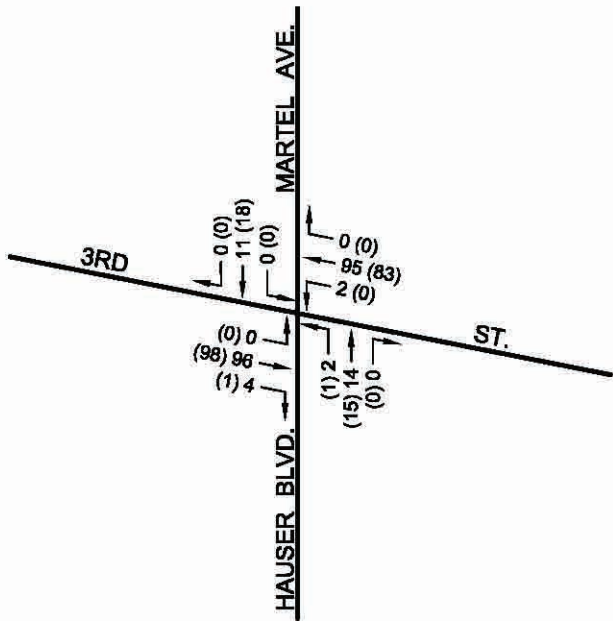
Source: Crain & Associates, March 12, 2013.



Figure IV.I-14
Future (2016) Traffic Volumes Without Project AM Peak Hour



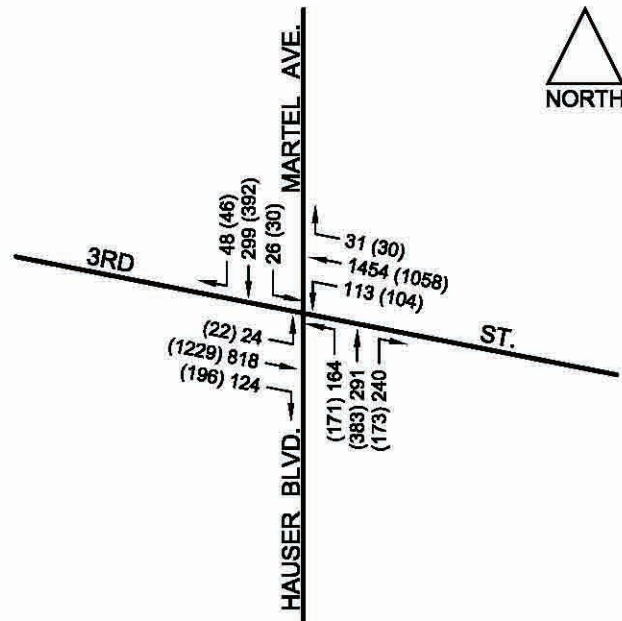
Source: Crain & Associates, March 12, 2013.



LEGEND:

XX - AM VOLUMES
(XX) - PM VOLUMES

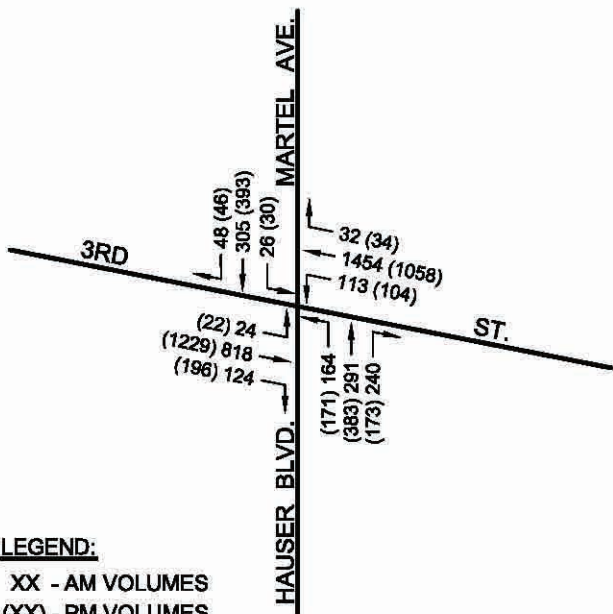
TOTAL RELATED PROJECT TRAFFIC VOLUMES



LEGEND:

XX - AM VOLUMES
(XX) - PM VOLUMES

FUTURE (2016) WITHOUT PROJECT TRAFFIC VOLUMES



LEGEND:

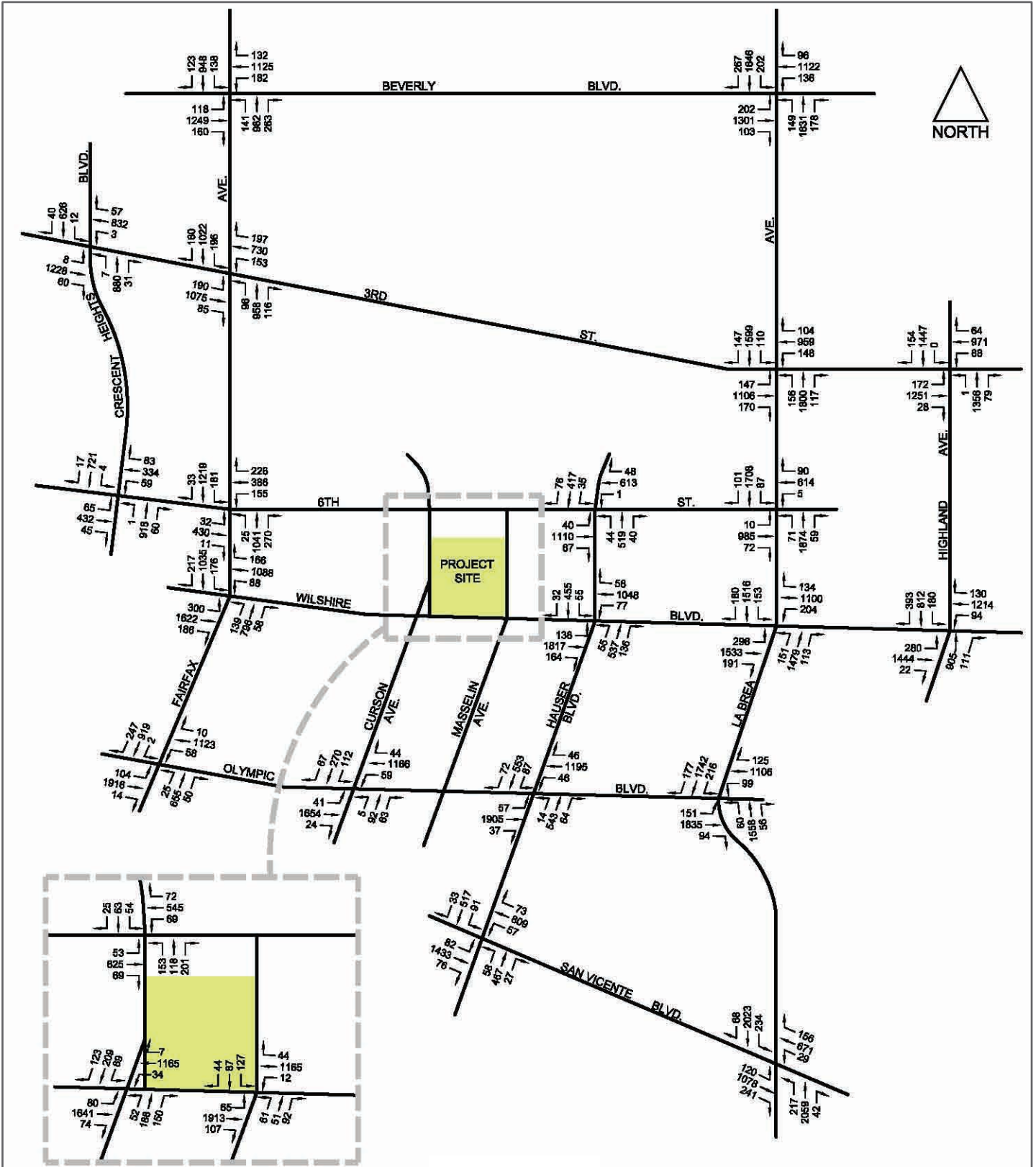
XX - AM VOLUMES
(XX) - PM VOLUMES

FUTURE (2016) WITH PROJECT TRAFFIC VOLUMES

Source: Crain & Associates, March 12, 2013.



Figure IV.I-16
Martel Avenue-Hauser Boulevard-3rd Street
Future (2016) Traffic Volumes Without and with Project AM & PM Peak Hour



Source: Crain & Associates, March 12, 2013.

**Table IV.I-11
Existing + Project Traffic Conditions**

No.	Intersection	Peak Hour	Existing (2013) Conditions					Future (2016) Conditions					
			Existing		Existing + Project			Without Project		With Project			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	Significant
1.	Crescent Heights Boulevard / 3rd Street	AM	0.748	C	0.750	C	0.002	0.805	D	0.808	D	0.003	No
		PM	0.603	B	0.606	B	0.003	0.661	B	0.663	B	0.002	No
2.	Crescent Heights Boulevard / 6th Street	AM	0.635	B	0.638	B	0.003	0.686	B	0.689	B	0.003	No
		PM	0.577	A	0.577	A	0.000	0.631	B	0.631	B	0.000	No
3.	Fairfax Avenue / Beverly Boulevard	AM	0.875	D	0.880	D	0.005	0.991	E	0.997	E	0.006	No
		PM	0.848	D	0.856	D	0.008	0.971	E	0.979	E	0.008	No
4.	Fairfax Avenue / 3rd Street	AM	0.887	D	0.896	D	0.009	0.995	E	1.004	F	0.009	No
		PM	0.845	D	0.855	D	0.010	0.957	E	0.966	E	0.009	No
5.	Fairfax Avenue / 6th Street	AM	0.714	C	0.719	C	0.005	0.796	C	0.801	D	0.005	No
		PM	0.679	B	0.685	B	0.006	0.755	C	0.762	C	0.007	No
6.	Fairfax Avenue / Wilshire Boulevard	AM	0.921	E	0.923	E	0.002	1.229	F	1.231	F	0.002	No
		PM	0.759	C	0.768	C	0.009	1.019	F	1.032	F	0.013	Yes
7.	Fairfax Avenue / Olympic Boulevard	AM	0.836	D	0.842	D	0.006	0.876	D	0.882	D	0.006	No
		PM	0.764	C	0.771	C	0.007	0.814	D	0.821	D	0.007	No
8.	Curson Avenue / 6th Street	AM	0.511	A	0.513	A	0.002	0.537	A	0.540	A	0.003	No
		PM	0.489	A	0.495	A	0.006	0.517	A	0.523	A	0.006	No
9.	Curson Avenue / Wilshire Boulevard	AM	0.611	B	0.659	B	0.048	0.846	D	0.893	D	0.047	Yes
		PM	0.518	A	0.539	A	0.021	0.763	C	0.776	C	0.013	No
10.	Curson Avenue / Olympic Boulevard	AM	0.643	B	0.651	B	0.008	0.650	B	0.659	B	0.009	No
		PM	0.591	A	0.601	B	0.010	0.605	B	0.615	B	0.010	No
11.	Masselin Avenue / Wilshire Boulevard	AM	0.451	A	0.479	A	0.028	0.699	B	0.717	C	0.018	No
		PM	0.477	A	0.519	A	0.042	0.723	C	0.767	C	0.044	Yes

**Table IV.I-11
Existing + Project Traffic Conditions**

No.	Intersection	Peak Hour	Existing (2013) Conditions					Future (2016) Conditions					
			Existing		Existing + Project			Without Project		With Project			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	Significant
12.	Hauser Boulevard / 6th Street	AM	0.652	B	0.660	B	0.008	0.694	B	0.702	C	0.008	No
		PM	0.694	B	0.698	B	0.004	0.739	C	0.743	C	0.004	No
13.	Hauser Boulevard / Wilshire Boulevard	AM	0.611	B	0.625	B	0.014	0.841	D	0.860	D	0.019	No
		PM	0.692	B	0.707	C	0.015	0.930	E	0.952	E	0.022	Yes
14.	Hauser Boulevard / Olympic Boulevard	AM	0.889	D	0.897	D	0.008	0.913	E	0.921	E	0.008	No
		PM	0.789	C	0.793	C	0.004	0.821	D	0.825	D	0.004	No
15.	Hauser Boulevard / San Vicente Boulevard	AM	0.669	B	0.670	B	0.001	0.681	B	0.683	B	0.002	No
		PM	0.657	B	0.660	B	0.003	0.675	B	0.679	B	0.004	No
16.	La Brea Avenue / Beverly Boulevard	AM	0.945	E	0.949	E	0.004	1.113	F	1.117	F	0.004	No
		PM	0.908	E	0.915	E	0.007	1.069	F	1.075	F	0.006	No
17.	La Brea Avenue / 3rd Street	AM	0.848	D	0.854	D	0.006	0.986	E	0.991	E	0.005	No
		PM	0.796	C	0.805	D	0.009	0.909	E	0.918	E	0.009	No
18.	La Brea Avenue / 6th Street	AM	0.667	B	0.675	B	0.008	0.742	C	0.751	C	0.009	No
		PM	0.663	B	0.670	B	0.007	0.750	C	0.757	C	0.007	No
19.	La Brea Avenue / Wilshire Boulevard	AM	0.757	C	0.779	C	0.022	1.032	F	1.056	F	0.024	Yes
		PM	0.847	D	0.859	D	0.012	1.117	F	1.127	F	0.010	Yes
20.	La Brea Avenue / Olympic Boulevard	AM	0.923	E	0.929	E	0.006	0.994	E	1.000	F	0.006	No
		PM	0.913	E	0.918	E	0.005	0.984	E	0.988	E	0.004	No
21.	La Brea Avenue / San Vicente Boulevard	AM	0.983	E	0.984	E	0.001	1.030	F	1.032	F	0.002	No
		PM	0.825	D	0.828	D	0.003	0.882	D	0.885	D	0.003	No
22.	Highland Avenue / 3rd Street	AM	0.980	E	0.984	E	0.004	1.059	F	1.064	F	0.005	No
		PM	0.887	D	0.889	D	0.002	0.972	E	0.974	E	0.002	No

**Table IV.I-11
Existing + Project Traffic Conditions**

No.	Intersection	Peak Hour	Existing (2013) Conditions					Future (2016) Conditions					
			Existing		Existing + Project			Without Project		With Project			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	Significant
23.	Highland Avenue / Wilshire Boulevard	AM	0.973	E	0.977	E	0.004	1.237	F	1.243	F	0.006	No
		PM	0.897	D	0.904	E	0.007	1.129	F	1.136	F	0.007	No
24.	Martel Avenue / Hauser Boulevard	AM	0.705	C	0.709	C	0.004	0.769	C	0.773	C	0.004	No
		PM	0.798	C	0.799	C	0.001	0.871	D	0.871	D	0.000	No

*Notes: CMA = Critical Movement Analysis; LOS = Level of Service
Source: Crain and Associates, 2013.*

As shown, under Future (2016) Without Project and Future (2016) With Project conditions, traffic operations at all Wilshire Boulevard intersections (#'s 6, 9, 11, 13, 19 and 23) are expected to deteriorate when compared with existing conditions following the implementation of the Wilshire BRT Project, which reduces the number of eastbound and westbound through travel lanes during the AM and PM peak periods. Under Future (2016) Without Project conditions, nine of the 24 study intersections would operate at LOS C or better during both peak hours, three intersections would operate at LOS D or better during both peak hours, and 12 intersections would operate at LOS E or F during one or both peak hours.

Under Future (2016) With Project conditions, nine of the 24 study intersections would continue to operate at LOS C or better during both peak hours, four intersections would operate at LOS D or better during both peak hours, and 12 intersections would operate at LOS E or F during one or both peak hours. Following the addition of project-related traffic, five study intersections would experience deteriorations in LOS during the AM peak hour only (no change in LOS during the PM peak hour). The CMA/LOS calculation worksheets for existing and future conditions are included in Appendix C of the Traffic Report.

Based on the significant impact criteria set forth above in Table IV.I-8, and as shown previously in Table IV.I-11, no significant intersection impact is expected to result due to the Project under Existing conditions. The Project is expected to result in significant impacts to the following five study intersections under Future conditions, prior to mitigation:

- 6. Fairfax Avenue / Wilshire Boulevard (PM peak hour)
- 9. Curson Avenue / Wilshire Boulevard (AM peak hour)
- 11. Masselin Avenue / Wilshire Boulevard (PM peak hour)
- 13. Hauser Boulevard / Wilshire Boulevard (PM peak hour)
- 19. La Brea Avenue / Wilshire Boulevard (AM and PM peak hours)

Mitigation measures recommended to address these significant impacts are described in the Mitigation Measures section below.

Residential Street Impact Analysis

In order to address local residential neighborhood concerns, traffic impacts were analyzed on two study area residential street segments in the surrounding area. Automatic 24-hour traffic counts were conducted in November 2012 on a typical weekday on the street segment locations listed below. These daily counts were growth factored by one percent to represent existing (2013) volumes. The 24-hour automated traffic count data sheets are contained in Appendix A of the Traffic Report.

1. Curson Avenue, south of 8th Street
2. Masselin Avenue, south of 8th Street

These residential street segments are those most likely to be affected by Project traffic. Per LADOT policy, the determination of significance for a residential street traffic impact is based on the average daily traffic (ADT) volumes traversing the study street segment. The incremental project-related increase in daily traffic on a residential street is considered by LADOT to be significant if it exceeds the criteria in previously discussed and shown in Table IV.I-9 (Neighborhood Traffic Intrusion Significant Impact Thresholds).

Existing (2013) Plus Project daily traffic volumes were developed by adding Project daily volumes to Existing (2013) baseline traffic volumes. In order to develop future traffic volumes on the study residential street segments, the same procedures and assumptions described previously for the development of future peak-hour intersection volumes were used. The Future (2016) Without Project daily traffic volume estimates were based on Existing (2013) daily traffic volumes, plus daily traffic volumes due to ambient traffic growth and related projects. The Future (2016) With Project daily traffic volumes include the addition of Project daily traffic volumes. The results of the residential street impact analysis are summarized in Table IV.I-12. As shown in Table IV.I-12 and in accordance with the significance criteria set forth in Table IV.I-9, neither of the study street segments would experience an increase in Project traffic volumes resulting in a significant impact under Existing or Future conditions.

**Table IV.I-12
Residential Street Impact Analysis**

Street Segment	Average Daily Traffic (ADT)				
	Existing (2013)	Project Traffic	Existing (2013) + Project	% Project Traffic	
1. Curson Avenue, south of 8th Street	4,919	122	5,041	2.4%	
2. Masselin Avenue, south of 8th Street	1,163	70	1,233	5.7%	
Street Segment	Average Daily Traffic (ADT) - Future (2016)				
	Existing (2013)	Without Project	Project Traffic	With Project	% Project Traffic
1. Curson Avenue, south of 8th Street	4,919	5,330	122	5,452	2.2%
2. Masselin Avenue, south of 8th Street	1,163	1,230	70	1,300	5.4%

Source: Crain and Associates, 2013.

Congestion Management Program (CMP) Impact Analysis

The traffic impact guidelines of the current 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

The nearest CMP arterial monitoring locations are the following intersections:

- La Brea Avenue / Wilshire Boulevard (approx. 0.5 miles east of the project site)
- La Cienega Boulevard / Wilshire Boulevard (approx. 1.25 miles west)
- Highland Avenue / Santa Monica Boulevard (approx. 2.0 miles northeast)
- La Cienega Boulevard / Santa Monica Boulevard (approx. 2.25 miles northwest)

A review of the Project trip generation (shown in Table IV.I-6) and Project only traffic volumes (shown in Figures IV.I-10 and IV.I-11) shows that the Proposed Project would be expected to contribute 50 or more peak-hour trips to only one CMP monitoring intersection: La Brea Avenue/Wilshire Boulevard. As shown in the detailed CMA analysis herein, these Project trips would result in a significant Project impact under future traffic conditions during both peak hours. The impact criteria applied in the preceding analysis for this intersection is also more stringent than those described in the CMP. Potential mitigation measures recommended for this location are discussed in the following Mitigation Measures section below.

The nearest CMP freeway monitoring segments are as follows:

- Santa Monica Freeway, east of La Brea Avenue (approx. 2.0 miles south of the Project Site)
- Hollywood Freeway, south of Santa Monica Boulevard (approx. 3.25 miles northeast)

It is estimated that the Proposed Project would contribute no more than 23 directional trips to any freeway segment during either peak hour. As this Project contribution is well below the 150 directional-trip threshold, no significant Project impacts to CMP freeway monitoring locations are forecast and no additional freeway analysis is necessary.

Transit Impact Analysis

The Proposed Project is estimated to generate 1,388 net vehicle trips per day, including 228 trips during the AM peak hour and 242 trips during the PM peak hour. This trip generation reflects a vehicle trip reduction of up to 15 percent due to transit usage, which amounts to 245 daily, 41 AM peak-hour and 42 PM peak-hour trips. No pass-by or existing use trip reductions have been included. Per the 2010 CMP guidelines, person trips can be estimated by multiplying the transit vehicle trip reductions by a conversion factor of 1.4. Therefore, the number of Proposed Project person trips anticipated to be added to transit is shown below in Table IV.I-13.

**Table IV.I-13
Project Transit Person Trips**

Time Period	Project Vehicle Trip Reductions Due to Transit	Conversion Factor	Project Transit Person Trips
Daily	245	1.4	343
AM Peak Hour	41	1.4	57
PM Peak Hour	42	1.4	59
<i>Source: Crain and Associates, 2013.</i>			

The most convenient and direct transit route for the Proposed Project is along Wilshire Boulevard, which is immediately adjacent to the Project Site. Except for the LADOT DASH Fairfax line, no regular transit service is provided along 6th Street, the next closest arterial to the Site. For purposes of a conservative analysis, this transit analysis assumed that all Project transit person trips would be concentrated on Metro bus lines traveling along Wilshire Boulevard between Fairfax Avenue and La Brea Avenue.

There are two Metro lines on Wilshire Boulevard in this vicinity, Line 20, a local line, and Line 720, a Metro Rapid line. As Line 20 has stops adjacent to the Site and Line 720 does not, the analysis focused solely on Line 20. This further enhanced the conservative analysis, as no bus capacity from Line 720 was included.

Information regarding the existing transit usage for Line 20 was obtained from Metro. This information included daily and peak-period bus boardings and alightings. During the weekday peak period of 6:00 to 9:00 AM, Line 20 has 37 buses arriving at Curson Avenue with 685 passengers onboard. During the weekday peak period of 3:00 to 7:00 PM, this line has 46 buses arriving at Curson Avenue with 1,160 passengers onboard. Dividing the 37 buses by 3 hours yields 12.33 buses per hour during the AM period; dividing the Project's AM peak-hour transit person trips of 57 by 12.33 buses per hour yields an average of 4.6 Project transit person trips per bus during the AM peak hour. Similarly, dividing the 46 buses by 4 hours yields 11.50 buses per hour during the PM period; dividing the Project's PM peak-hour transit person trips of 59 by 11.5 buses per hour yields an average of 5.1 Project transit person trips per bus during the PM peak hour.

Thus, there are an average of 18.5 passengers per bus during the AM peak period and 25.2 passengers per bus during the PM peak period. It is estimated that, at Curson Avenue, the Project would add an average of 4.6 passengers during the AM peak hour and 5.1 passengers during the PM peak hour to Line 20. Together with the current passenger loads, the combined passenger loads would average 23.1 and 30.3 passengers per bus during the respective AM and PM peak hours. Based on a typical bus seating capacity of 40 persons, there would still remain a seating capacity of 24 to 42 percent. Therefore, the addition of Project transit trips is not expected to result in a significant impact to transit.

4. CUMULATIVE IMPACTS

Construction

The construction of 48 related projects is anticipated in the Project Site area. These 48 related projects are dispersed throughout the Project Site area and draw upon a workforce from all parts of the Los Angeles region. Many of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.) thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. In addition, the haul truck routes for the related projects would be approved by LADOT according to the location of the individual construction site and the ultimate destination. LADOT's established review process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway.

As previously discussed and analyzed, the Proposed Project's construction-related impacts would be less than significant. It is possible that the construction periods for Metro Rail and the AAMP project could overlap with the construction of the Proposed Project. In the event of concurrent construction activity involving the AAMP project, the Metro Rail project and Proposed Project, cumulative traffic impacts would be significant and unavoidable during the construction period as described in the Metro Rail EIS/EIR and the Proposed Project would contribute incrementally to this impact. Traffic conditions and facilities in the vicinity of Wilshire Boulevard, La Brea Avenue, Fairfax Avenue and other nearby streets would be cumulatively and more severely impacted during periods when these construction activities are concurrent. To avoid substantial inconvenience and disruption as much as feasible, the Construction Staging and Traffic Management Plan, as described earlier under "Project Design Features" for the Proposed Project, as well as a similar plan that would be required for the AAMP project by the City, will take into account and be coordinated with other construction traffic management plans in the vicinity. In addition, Metro will implement the measures outlined in the Final EIS/EIR to minimize impacts during the construction of the subway project. However, even with implementation of the maximum feasible implementation of mitigation measures, cumulative construction traffic impacts would be temporarily significant and unavoidable in the event of concurrent construction of these three projects.

Operation

The traffic models used in the above analysis incorporated forecasted traffic increases due to ambient growth through the year 2016 as well as related projects. Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, regional transportation (freeway) system, and access as a result of the Proposed Project have been analyzed and incorporated; Proposed Project Impacts associated with the regional transportation system and access would be less than significant.

As concluded within the relative discussions above, the Proposed Project would result in significant impacts at five study intersections prior to mitigation. As described in detail below, comprehensive reviews of the significantly impacted study locations revealed that, at four of the five intersections, physical mitigation measures would be infeasible due to potentially significant secondary impacts; because the mitigation measures are not considered feasible at four of the five abovementioned study intersections Project impacts would remain significant and unavoidable. Therefore, the Project would significantly contribute to cumulative impacts at four study intersections.

With regard to public transit, similar to the Proposed Project, the related projects would generate an overall increase in transit riders. This effect is a positive impact and is consistent with City land use and

transportation policies to reduce traffic. The anticipated increased transit ridership associated with the Proposed Project and related projects are not expected to exceed the capacity of transit systems. Thus, the Proposed Project's incremental contribution would not be significant, and cumulative impacts to transit would not be cumulatively considerable.

With regard to parking and access, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the vicinity of the Project Site. Therefore, the Proposed Project's cumulative impacts related to these issues would not be cumulatively considerable.

5. REGULATORY COMPLIANCE AND MITIGATION MEASURES

As indicated in the preceding traffic analysis, the proposed Museum Square Office Building Project is expected to significantly impact the following study intersections under future traffic conditions, prior to mitigation:

- 6. Fairfax Avenue / Wilshire Boulevard (PM peak hour)
- 9. Curson Avenue / Wilshire Boulevard (AM peak hour)
- 11. Masselin Avenue / Wilshire Boulevard (PM peak hour)
- 13. Hauser Boulevard / Wilshire Boulevard (PM peak hour)
- 19. La Brea Avenue / Wilshire Boulevard (AM and PM peak hours)

A series of mitigation measures were investigated to address these significant impacts.

As a first step, mitigation in the form of Transportation Demand Management (TDM) and Trip Reduction Measures was analyzed. The Project will comply with the requirements of the City of Los Angeles TDM Ordinance (No. 168,700) as a non-residential development in excess of 100,000 gross square feet in size. In order to determine the effect of TDM program implementation for the Proposed Project, it was conservatively estimated that such a program would result in a five percent decrease in Project trips. With a five-percent reduction, the Project trip generation with TDM would be reduced to 217 trips (191 inbound, 26 outbound) during the AM peak hour and 230 trips (39 inbound, 191 outbound) during the PM peak hour. Using these Project volumes, a Future (2016) With Project With Mitigation condition was analyzed, and the results are shown in Table IV.I-14. As shown in the table and described further in this section, impacts at four of the five intersections would remain significant with a TDM program due to a lack of feasible physical mitigation. At the intersection of Masselin Avenue and Wilshire Boulevard, however, the implementation of a TDM program and physical mitigation measures (described below) would reduce the Project impact to a less-than-significant level.

**Table IV.I-14
Critical Movement Analysis (CMA) & Level of Service (LOS) Summary
Future (2016) With Mitigation Traffic Conditions**

No.	Intersection	Peak Hour	Without Project		With Project			With Project + Mitigation		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
6.	Fairfax Avenue / Wilshire Boulevard	AM	1.229	F	1.231	F	0.002	1.231	F	0.002
		PM	1.019	F	1.032	F	0.013*	1.031	F	0.012*
9.	Curson Avenue / Wilshire Boulevard	AM	0.846	D	0.893	D	0.047*	0.891	D	0.045*
		PM	0.763	C	0.776	C	0.013	0.775	C	0.012
11.	Masselin Avenue / Wilshire Boulevard	AM	0.699	B	0.717	C	0.018	0.716	A	0.017
		PM	0.723	C	0.767	C	0.044*	0.755	C	0.032
13.	Hauser Boulevard / Wilshire Boulevard	AM	0.841	D	0.860	D	0.019	0.859	D	0.018
		PM	0.930	E	0.952	E	0.022*	0.951	E	0.021*
19.	La Brea Avenue / Wilshire Boulevard	AM	1.032	F	1.056	F	0.024*	1.053	F	0.021*
		PM	1.117	F	1.127	F	0.010*	1.126	F	0.009

*Note: * indicates a significant Project traffic impact based on LADOT criteria.
Source: Crain and Associates, 2013.*

Given that the implementation of the aforementioned TDM program and its trip reduction effectiveness alone would not be expected to mitigate the impacts at any of the five intersections to less-than-significant levels, potential physical mitigation measures were examined as a second step. With the planned improvements on Wilshire Boulevard as part of the Wilshire BRT project, improvements to the Wilshire Boulevard eastbound and westbound approaches at these locations were not considered practical. As described below, comprehensive reviews of the significantly impacted study locations revealed that, at four of the five intersections, physical mitigation measures would be infeasible due to potentially significant secondary impacts.

Mitigation Measure Feasibility Analysis

Intersection 6. Fairfax Avenue / Wilshire Boulevard: Widening and restriping along Fairfax Avenue to convert the southbound right-turn-only lane to a shared through/right-turn lane would mitigate the Project impact to a less-than-significant level. In order to provide an additional (third) southbound lane for through movements, this through lane would have to extend from several blocks north of Wilshire Boulevard to several blocks south of Wilshire Boulevard, resulting in the reconstruction of numerous unsignalized and signalized intersections along Fairfax Avenue. Implementation of this mitigation would also require substantial acquisition of private property and partial demolition of private buildings. On-street parking spaces would also have to be removed, with little opportunity for relocation within a convenient walking distance. ***Considering these factors, this mitigation measure is not considered feasible for this intersection.***

Intersection 9. Curson Avenue / Wilshire Boulevard: Restriping the south leg of Curson Avenue to provide a northbound right-turn-only lane would mitigate the Project impact to a less-than-significant level. Implementation of this mitigation would require the removal of four Loading Zone parking spaces located along the east side of Curson Avenue, immediately south of Wilshire Boulevard, that serve the Wilshire Courtyard development located at the southeast corner of this intersection. As development adjacent Loading Zone parking spaces, their relocation within a convenient walking distance of the Wilshire Courtyard development would not be practicable. The provision of the northbound right-turn-only would also potentially require the removal of metered parking spaces located along the east side of the Curson Avenue, further south of Wilshire Boulevard. If the Curson Avenue south leg were widened to install the northbound right-turn-only lane while retaining the existing Loading Zone and metered parking spaces, this measure would require a reduction in sidewalk widths to less than the standard 10 feet for Collector Streets or the acquisition of private property and partial demolition of private buildings. Such a reduction in sidewalk widths would be contrary to the City's Walkability Checklist. ***Considering these factors, this mitigation measure is not considered feasible for this intersection.***

Intersection 11. Masselin Avenue / Wilshire Boulevard: Restriping the south leg of Masselin Avenue to provide an exclusive left-turn lane for the northbound approach would mitigate the Project impact to a less-than-significant level. The sidewalk and curb return at the northwest corner of the intersection would require minor reconstruction, and the traffic signal equipment would be modified as necessary. Implementation of this mitigation could be achieved without the removal of on-street parking spaces along Masselin Avenue, as shown in the conceptual mitigation plan provided in Appendix E. The results of Future (2016) With Project With Mitigation analysis at this location, assuming the aforementioned TDM program implementation and this physical improvement, are shown in Table IV.I-14.

Intersection 13. Hauser Boulevard / Wilshire Boulevard: Widening and restriping along Hauser Boulevard to provide two northbound through travel lanes along the portion of this roadway

including the Wilshire Boulevard intersection would mitigate the Project impact to a less-than-significant level. With this improvement, the Hauser Boulevard northbound approach at this intersection would consist of a left-turn lane, a through travel lane, and a shared through/right-turn lane. The two northbound travel lanes would continue north of the intersection until 6th Street, where the inside through lane would become a “trap” left-turn lane. In order to provide an additional northbound lane for through movements, a substantial amount of on-street parking on Hauser Boulevard, north and south of the intersection, would have to be removed. Given the quantity of parking spaces that would require removal, their relocation within a convenient walking distance would not be practicable. If Hauser Boulevard were widened to install the additional northbound through lane while retaining the existing on-street parking spaces, this measure would require a reduction in sidewalk widths to less than the standard 10 feet for Collector Streets or the acquisition of private property and partial demolition of private buildings. Such a reduction in sidewalk widths would be contrary to the City’s Walkability Checklist. The intersections of Hauser Boulevard and 6th Street and Hauser Boulevard and 8th Street would also likely have to be reconstructed. ***Considering these factors, this mitigation measure is not considered feasible for this intersection.***

Intersection 19. La Brea Avenue / Wilshire Boulevard: Widening and restriping the La Brea Avenue southbound approach to provide a right-turn-only lane would mitigate the Project AM and PM peak-hour impacts to less-than-significant levels. With this improvement, the La Brea Avenue southbound approach at this intersection would consist of a left-turn lane, three through travel lanes, and a right-turn-only lane. Implementation of this mitigation would require the acquisition of private property at the northwest corner of the intersection and partial demolition of private buildings. ***Considering these factors, this mitigation measure is not considered feasible for this intersection.***

As discussed above, because the mitigation measures are not considered feasible at four of the five abovementioned study intersections Project impacts would remain significant and unavoidable. However, some impacts can be mitigated through the implementation of the following regulatory compliance and mitigation measures:

Regulatory Compliance Measure:

RC-TRA-1 The Proposed Project shall comply with the provisions of the City’s Transportation Demand Management Ordinance No. 168,700 in order to reduce the number of vehicle trips generated by the Proposed Project. The Applicant shall record a Covenant and Agreement to ensure compliance with the provisions of the Transportation Demand Management Ordinance. The Applicant shall develop and implement a Transportation Demand Management (TDM) Plan that satisfies standard requirements of the Transportation Demand Management Ordinance and offers additional strategies to reduce the amount of vehicle trips generated by the Proposed Project. A preliminary TDM Plan shall be prepared and provided for LADOT review prior to the issuance of the first building permit and a final TDM Plan approved by LADOT is required prior to the issuance of the first certificate of occupancy. The TDM Plan should include, but not be limited to, the following strategies:

- Flexible/alternative work schedules and telecommuting programs;
- Bicycle and pedestrian-friendly environment;

- Bicycle amenities such as easily accessible racks and showers available for employee use;
- Provision of partially or fully subsidized transit passes offered to site employees;
- Transportation information center, which would provide a centrally-located commuter information center that allows employees to obtain information on ridesharing, telecommuting, transit schedules, bicycle plans, etc.;
- Transportation Management Coordination Program with an on-site transportation coordinator;
- Guaranteed ride home for all employees that carpool, vanpool, or take transit to work;
- Provide carpool and vanpool opportunities and financial incentives;
- Pursuant to Internal Revenue Code Section 132(f), arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees;
- Parking strategies, including compliance with the State parking cash-out law and unbundling the Site's parking spaces.
- Administrative support for the formation of carpools/vanpools;
- Provision of car-share amenities on-site to potentially incorporate into the City's future Integrated Mobility Hubs project (a shared bike and car program planned within transit-rich areas scheduled for implementation in 2016);
- Self-service bicycle repair area and shared tools for employees;
- Bike and walk to work promotions;
- Preferential rideshare loading/unloading or parking location; and
- Financial contribution of a one-time fixed-fee in the amount of \$100,000 to the City's bicycle Plan Trust Fund (funds would be used by LADOT, in coordination with the affected Council Office and the Department of City Planning, to implement strategies identified in the 2010 Bicycle Plan within the project study area).

Mitigation Measure:

MM-TRA-1 The Project will implement the restriping of the south leg of Masselin Avenue to provide an exclusive left-turn lane for the northbound approach. The sidewalk and curb return at the northwest corner of the intersection will require minor reconstruction, and the traffic signal equipment will be modified as necessary.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts associated with the construction of the Project would be less than significant and no mitigation measures are necessary.

Even with implementation of the regulatory compliance and mitigation measures listed above, Project impacts associated with the operation of the Project at four of the 24 study intersections would be significant and unavoidable as no additional mitigation measures are feasible.

V. GENERAL IMPACT CATEGORIES

1. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis contained in Section IV (Environmental Impact Analysis) of this Draft EIR, implementation of the Proposed Project would result in significant unavoidable environmental impacts relative to Aesthetics (shade and shadow); Noise (construction); and Traffic/Transportation (operational impacts to four intersections).

A. Aesthetics

The Proposed Project would shade off-site residential sensitive uses in excess of the established significance thresholds; no mitigation measures are available to address the impact and the analysis concludes that the impact would be significant and unavoidable.

B. Noise

Noise associated with construction activities at the Project Site would exceed the City's threshold of significance at nearby sensitive receptors, including the multi-family residential buildings to the north of the Project Site. Even with the implementation of mitigation measures, noise levels would periodically exceed the City threshold during the construction of the Project and would be significant and unavoidable.

C. Traffic/Transportation

Project impacts associated with the operation of the Project at four of the 24 study intersections, i.e., Fairfax Avenue / Wilshire Boulevard, Curson Avenue / Wilshire Boulevard, Hauser Boulevard / Wilshire Boulevard, and La Brea Avenue / Wilshire Boulevard, would be significant and unavoidable as no mitigation measures are feasible.

2. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

State CEQA Guidelines Section 15126.2(d) requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. State CEQA Guidelines Section 12126.2(d) states:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to

population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Proposed Project Site is the approximately 135,831 sf northern portion of the Museum Square development which contains the parking structure and a portion of the surface parking lot (refer to Figure II-3, Parcel Survey Map). The Proposed Project is requesting a lot split to separate an approximately 25,852 sf parcel at the northwestern corner of the Museum Square site which contains a portion of the surface parking lot from the remainder of the Museum Square site (which contains the 11-story commercial development, access lanes and parking structure), to create a separate, financeable parcel under the new building (refer to Figure II-4, Proposed New Parcel Map). Following the lot split, that portion of the existing surface parking lot would be demolished, allowing for the construction of a new 13-story, approximately 249,500 square-foot commercial office building and the addition of two new levels of parking (approximately 162,768 square feet) to the existing five-level parking.

The 13-story building will be 207 feet high and following the addition, the parking structure will be approximately 72 feet high. The Proposed Project would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

The current zoning across a portion of the Proposed Project Site is not consistent with the proposed use. In order to allow for the Proposed Project, the Project Applicant, along with the request for the granting of a lot split, will seek a zone change to convert the approximately 118,596 sf portion of the parcel which contains a portion of the surface parking lot and the parking structure, from QPB-2 zoning to (Q)C4-2 zoning (refer to Figure II-5, Proposed Zone Change Map). This change will result in the entire Museum Square site being singularly zoned for commercial use.

The Project Site is located in Height District 2, which typically permits a maximum FAR of 6:1 with no height limit in the C4 zone. The full Museum Square Site is a rectangular shaped property that is approximately 7-1/2 acres (327,613 square feet). The existing Museum Square office complex is approximately 530,000 square feet. The Proposed Project would add an approximately 249,500 square-foot commercial office building. The Proposed Project is requesting a Conditional Use Permit ("CUP") to allow floor area ratio averaging for a unified commercial development in a C zone, which is requested in conjunction with the subdivision of the current parcel into two parcels, as previously discussed. With the granting of the CUP, the FAR for the full Museum Square Site, including the existing development and the Proposed Project would be 2.38:1, which falls within the allowable 6:1 FAR. Therefore, the Proposed Project would be consistent with the height district limitations.

As discussed in Section IV.G. (Land Use and Planning), the Proposed Project would conform to the objectives and policies identified in the various Elements of the General Plan, the "Regional Commercial" land use designation, and is consistent with the mandate of SB 375, which requires that California greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020. The Miracle Mile community is currently served by Metro buses and the LADOT DASH Fairfax service. The nearest Metro rail line (Purple Line) Station to the Project Site is located at Wilshire Boulevard and Western Avenue, approximately two and one half miles east of the Project Site. Work to bring the Metro Purple Line further west is moving forward, with plans approved to add nine miles of subway, in three Planned

(Section 1) and Forecasted (Sections 2 and 3) Schedules. Under the currently Planned Schedule for Section 1, an additional 3.9 miles will be added to the line along with three new Metro Purple Line Stations at the intersections of Wilshire Boulevard and La Brea Avenue, Wilshire Boulevard and Fairfax Avenue, and Wilshire Boulevard and La Cienega Boulevard. Metro anticipates that a Full Funding Grant Agreement for Section 1 of the subway extension will be executed with the Federal Transit Administration (FTA) in early 2014. With the local funds provided by Measure R, this should provide sufficient funds to begin construction of Section 1 of the extension.¹ New Metro Purple Line Stations are proposed in the Project vicinity at the intersections of Wilshire Boulevard and La Brea Avenue and Wilshire Boulevard and Fairfax Avenue. Local bus routes serving the area include Metro Local Lines 20, 212/312, and 217 and Metro Rapid Lines 720 and 780. The City provides the Fairfax DASH shuttle service, which loops between the Hancock Park/Miracle Mile area to the Cedars-Sinai Medical Center and generally runs along Wilshire Boulevard, Fairfax Avenue, Melrose Avenue and La Cienega Boulevard. Additionally, the Wilshire Bus Rapid Transit (BRT) Project, which is scheduled for completion in November 2014, will convert the existing curb lane along Wilshire Boulevard to bus and right-turn-only operation during the weekday AM and PM peak periods throughout the area, will improve area transit services and bus travel times by an estimated 24%.

The Proposed Project would foster economic growth and revitalize an underutilized area by adding businesses to the Project Site. The employees associated with the Proposed Project could, in turn, patronize existing local businesses and services in the area. Additionally, as described in Section IV.A (Impacts Found to be Less Than Significant, J. Population and Housing), short-term and long-term employment opportunities would be provided during construction and operation of the Proposed Project.

As discussed in Section IV.A (Impacts Found to be Less Than Significant, J. Population and Housing), the Proposed Project would generate approximately 888 new employment opportunities. This increased employee population would patronize local businesses and services in the area, and would foster economic growth. As discussed in Section IV.A (Impacts Found to be Less Than Significant), it is unlikely that this growth would be substantial in the context of the growth forecasted for the City of Los Angeles or the Wilshire CPA and would result in a less than significant impact. The development of the Proposed Project would serve projected growth in the Los Angeles area and concentrate growth within a jobs-rich, existing urban center. Additionally, the Proposed Project, as an in-fill development, would be adequately served by existing public services.

Development of the Proposed Project would result in employee and visitor populations that would create demand for goods, services, or facilities not directly provided or satisfied within the Proposed Project. However, as discussed in Section IV.A (Impacts Found to be Less Than Significant, J. Population and Housing), the supply and demand for housing and employment are within the region's projected growth. Furthermore, Section IV.A (Impacts Found to be Less Than Significant, K. Public Services), addresses the demand for services created directly by the Proposed Project and the Proposed Project's impacts.

As also discussed in Section IV.A (Impacts Found to be Less Than Significant, K. Public Services and N. Utilities and Service Systems), because the Project Site is already developed and is located in a highly urbanized setting, the Proposed Project would not involve any substantial extension of infrastructure

¹ *Metro Purple Line Extension Frequently Asked Questions website: <http://www.metro.net/projects/westside/>, accessed January 3, 2014.*

such as roadways, water facilities, electricity transmission lines, natural gas lines, etc., or the construction of excess capacity of public facilities such as parks and recreation, schools, etc. beyond that required for currently anticipated growth. Any infrastructure associated with the Proposed Project would not induce growth because it would only serve the Proposed Project.

VI. ALTERNATIVES TO THE PROJECT

1. INTRODUCTION/METHODOLOGY

The CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the Proposed Project while still meeting the general project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Project

Section 15126.6(a) of the CEQA Guidelines states: “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the ‘rule of reason.’”

Purpose

Section 15126.6(b) of the CEQA Guidelines states: “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.”

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states: “The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate

impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the Proposed Project, and assumes that all applicable mitigation measures proposed for the Proposed Project would apply to each alternative. Impacts associated with the alternatives are compared to project-related impacts and are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the Proposed Project.

Level of Detail

The CEQA Guidelines do not require the same level of detail in the alternative analysis as in the analysis of the Proposed Project. Section 15126.6(d) of the CEQA Guidelines reads:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

Project Objectives

As discussed in Section II.4. (Project Description/Project Objectives) of this EIR, the objectives for the Proposed Project are:

- To provide infill commercial development by creating an iconic building in the Miracle Mile community, and implement good planning principles by constructing office uses along a major arterial and transit corridor.
- To provide a development that is compatible and complementary with surrounding land uses.
- To provide adequate parking facilities to serve the Proposed Project tenants and visitors.
- To maximize opportunities for the local and regional economy by constructing an economically viable Project that creates construction job opportunities, and attracts commercial tenants to the Proposed Project.
- To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.

2. ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination.

The alternatives considered and rejected as infeasible were:

Alternative 1: Alternative Site

The DEIR finds that significant short-term construction-related noise and shade and shadow impacts would result from the Project due to its location adjacent to residential uses. In order to locate the Project away from these residential uses, an "alternative site alternative" was considered which would

involve the development of the Proposed Project at a location other than the Project Site, which would still meet the Project Objectives. In order for this alternative to be feasible, an alternative site location would have to be available for purchase and development, of adequate size to accommodate the Proposed Project, and be located in the Miracle Mile community. As no such properties are available in the Project vicinity, this alternative was rejected as infeasible.

Alternative 2: Subterranean Parking

The DEIR finds that significant and unavoidable shade and shadow impacts would result from the Project due to its location adjacent to residential uses. In order to prevent the necessity of adding two new levels of parking to the existing parking structure to accommodate the needed parking for the Proposed Project, a “subterranean parking lot alternative” was considered. Implementation of this alternative would require additional excavation at the Project Site to a depth of at least approximately 25-30 feet across the full building footprint, as opposed to the minimal excavation of the Proposed Project (i.e., excavation to a depth of approximately six to eight feet which would match the footprint of the core of the building, approximately 2,700 sf (13.4%) of the total building footprint of approximately 20,010 sf). Therefore, due to the potential for increased impacts to Cultural Resources (both anthropological and paleontological), an increase in the potential for risk of upset due to the presence of high concentrations of methane in the soils at the Project Site, as well as increased construction air quality and noise impacts due to the need for additional excavation and earthmoving activity and increased duration of construction activity, this alternative was rejected as infeasible.

ALTERNATIVES TO THE PROJECT

The alternatives analyzed for the Proposed Project include:

Alternative 3: No Project Alternative;

Alternative 4: Reduced Project Alternative

Alternative 5: Alternative Project Configuration Alternative

These alternatives were included for analysis because of their potential to reduce the significant and unavoidable impacts of the Proposed Project.

The following alternatives analysis compares the potential environmental impacts of the three feasible alternatives with those of the Proposed Project for each of the environmental topics analyzed in detail in Section IV (Environmental Impact Analysis) of this EIR, although to a lesser level of detail than in Section IV (pursuant to State CEQA Guidelines Section 15126.6(d)). Based on the analysis included in Section IV (Environmental Impact Analysis) of this Draft EIR, the Proposed Project would result in significant and unavoidable environmental impacts related to shade and shadow, construction noise and operational traffic. Impacts associated with each alternative are compared to Project-related impacts and are classified as greater, less, or essentially similar (or comparable to) the level of impacts associated with the Proposed Project.

VI. ALTERNATIVES TO THE PROJECT

A. NO PROJECT ALTERNATIVE

1. DESCRIPTION

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project (CEQA Guidelines Section 15126.6(e)(1)). Pursuant to CEQA Guidelines Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved, based on current plans, and consistent with available infrastructure and community services.

In the event the Proposed Project is not approved, it is expected that the Project site will remain in its current condition and no new development would occur for the foreseeable future. Under the No Project Alternative, the Project site would remain a surface parking lot. In addition, this Alternative assumes the development of the related projects in the area of the Project site. The potential environmental impacts associated with the No Project Alternative are described below and are compared to the environmental impacts associated with the Proposed Project.

A. Aesthetics

i) Visual Quality/Views

Under the No Project Alternative, the Proposed Project would not be constructed. The Project Site would remain a surface parking lot and no addition to the existing parking structure would take place. Just as with the Proposed Project, the No Project Alternative would not affect views from a designated scenic highway, corridor, or parkway; neither would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. Furthermore, the Project Site does not contain any valued view resources such as historic buildings, nor are there any historic buildings within the vicinity that would be negatively impacted by the Proposed Project.¹ Therefore, impacts under No Project Alternative with respect to views and visual quality of the Project site would be less than the Proposed Project, and this Alternative would have no viewshed impacts.

ii) Light and Glare

Under the No Project Alternative, the Proposed Project would not be constructed. While the Project Site is currently lit with lighting for security purposes, full redevelopment would increase on-site lighting

¹ City of Los Angeles, Department of City Planning, *Historic-Cultural Monument (HCM) Report, Wilshire Planning Community*, website: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result.cfm?community=Wilshire, accessed December 21, 2012.

levels from current levels. Impacts of the No Project Alternative regarding construction and interior/exterior lighting and glare would be less than the Proposed Project's less than significant impacts. Impacts of the No Project Alternative regarding artificial light would be less than the Proposed Project and less than significant.

iii) Shade/Shadow

Under the No Project Alternative, the Project Site would remain a surface parking lot and no addition to the existing parking structure would take place, therefore there would be no new shadows cast on any shade-sensitive land uses. Impacts of the No Project Alternative regarding shade and shadows would be less than the Proposed Project, and this Alternative would avoid the significant and unavoidable shade and shadow impacts of the Proposed Project.

B. Agricultural and Forestry Resources

Under the No Project Alternative, no new construction would occur on the Project Site. No significant impacts related to agriculture or forestry resources have been identified under the Proposed Project. Therefore, impacts related to agriculture or forestry resources associated with the No Project Alternative would be the same as under the Proposed Project, and there would be no impact.

C. Air Quality

i) Construction Impacts

Under the No Project Alternative, no new construction would occur on the Project Site. Therefore, construction, and cumulative construction air quality impacts of the No Project Alternative would be less than the Proposed Project's less than significant impacts.

ii) Operational Impacts

Under the No Project Alternative, no new development would occur on the Project Site. Therefore, operational air quality impacts under the No Project Alternative would be less than the Proposed Project's less than significant impacts. Further, as construction and operation of the Proposed Project would not take place, the No Project Alternative would not contribute to cumulative operational impacts to air quality and would therefore be less than the Proposed Project's less than significant impacts.

D. Biological Resources

Under the No Project Alternative, no new construction would occur on the Project Site. No significant impacts related to biological resources have been identified under the Proposed Project. Therefore, impacts related to biological resources associated with the No Project Alternative would be the same as under the Proposed Project, and there would be no impact.

E. Cultural Resources

Under the No Project Alternative, no new construction would occur on the Project Site. Impacts to archaeological resources, human remains and paleontological resources are significant due to the

potential for damage to these resources as a result of the construction of the Proposed Project. However, implementation of Mitigation Measures CUL-1 through CUL-3 would ensure that potential impacts would be less than significant. Therefore, impacts related to cultural resources associated with the No Project Alternative would be less than the Proposed Project's less than significant impacts.

F. Geology and Soils

Under the No Project Alternative, no new land uses would be developed that would be subject to potential impacts associated with seismic fault rupture, strong seismic ground shaking, liquefaction and liquefaction-induced settlement, or expansive soils. Therefore, impacts of the No Project Alternative regarding geology and soils issues would be less than the Proposed Project's less than significant impacts.

G. Greenhouse Gas Emissions

Under the No Project Alternative, no new land uses would be developed. Therefore, impacts of the No Project Alternative regarding greenhouse gases would be less than the Proposed Project's less than significant impacts.

H. Hazards and Hazardous Materials

Under the No Project Alternative, no new grading, construction or operation of the Proposed Project would occur. Therefore, impacts of the No Project Alternative regarding hazards and hazardous materials would be less than the Proposed Project's less than significant impacts.

I. Hydrology and Water Quality

Under the No Project Alternative, no construction activities or development of new land uses would occur. Therefore, conditions at the Site would continue as they presently exist. It should be noted that with implementation of the Proposed Project's approved Low Impact Development (LID) Plan and proposed Best Management Practices, the quality of surface runoff from the Project Site would improve over the existing conditions. The No Project Alternative would therefore have a greater impact than the Proposed Project's less than significant impacts, but impacts would remain less than significant.

J. Land Use Planning

i) Land Use Compatibility

Under the No Project Alternative, no new construction would occur. As no changes to the Project Site would occur, there would be no impact with respect to land use compatibility. Thus, the existing land use type as well as the configuration and pattern of the Project Site and surrounding area would be maintained. As such, the overall character of land uses on the Project Site would be generally similar to existing conditions. The Proposed Project would have a less-than-significant impact with respect to functional land use compatibility as Project operations would not prevent the ability of the neighboring uses to continue in their current functions. Therefore, the no impact conclusion under the No Project Alternative would be less than the less-than-significant land use compatibility impact associated with the Proposed Project.

ii) Consistency with Regional Land Use Policies and Regulations

Under the No Project Alternative no new construction would occur. As such, no conflicts with regional land use policies would occur under this alternative and there would be no impact. The Proposed Project would be consistent with most of the applicable regional land use policies and impacts would be less than significant. Therefore, the no impact conclusion under the No Project Alternative would be less than the less-than-significant impact associated with the Proposed Project.

iii) Consistency with Local Land Use Policies and Regulations

Under the No Project Alternative no new construction would occur. The Proposed Project would require a Lot Split, a Zone Change on a portion of the parcel from QPB-2 to [Q]C4-2, a Variance to permit one parking space per one hundred five square feet in lieu of the required one parking space per thirty five square feet required for auditorium space and the removal of the current 15' building line setback in connection with the Zone Change. As no discretionary actions or approvals would be requested under the No Project Alternative, there would be no impact. Conversely, approval of the requested discretionary actions would be required to implement the Proposed Project. With approval of the requested discretionary actions, Project impacts would be less than significant. Therefore, the no impact conclusion under the No Project Alternative would be less than the less-than-significant impact associated with the Proposed Project.

K. Mineral Resources

Under the No Project Alternative, no new construction would occur on the Project Site. No impacts related to mineral resources have been identified under the Proposed Project. Therefore, impacts related to mineral resources associated with the No Project Alternative would be the same as under the Proposed Project, and there would be no impact.

L. Noise

i) Construction Impacts

Under the No Project Alternative, the Proposed Project would not be constructed. Since no construction activities would occur under the No Project Alternative, no short-term construction noise impacts are anticipated. This alternative would therefore avoid the significant and unavoidable construction noise impact of the project, and impacts would be less than the level of impacts associated with the Proposed Project.

ii) Operational Impacts

Operation of the Proposed Project could result in additional noise as a result of increased vehicle traffic or operational activities; however, these impacts would be less than significant without mitigation. Operational noise impacts associated with the No Project Alternative would be less than the Proposed Project and less than significant.

M. Population and Housing

Under the No Project Alternative, no new construction would occur on the Project Site. No significant impacts related to population and housing have been identified under the Proposed Project. Therefore, impacts related to population and housing associated with the No Project Alternative would be the same as under the Proposed Project, and there would be no impact.

N. Public Services

i) Fire

Under the Proposed Project impacts on fire protection services would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new structures or occupancy uses which could require assistance from the LAFD, including emergency medical services, would occur at the Project Site. The No Project Alternative would therefore have less impact than the Proposed Project's less than significant impacts.

ii) Police

Under the Proposed Project impacts on police protection services would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new structures or occupancy uses which could require assistance from the LAPD would occur at the Project Site. The No Project Alternative would therefore have less impact than the Proposed Project's less than significant impacts.

iii) Schools

Under the Proposed Project impacts on school services would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the demand for school services in the Project vicinity would follow. The No Project Alternative would therefore have less impact than the Proposed Project's less than significant impacts.

iv) Parks

Under the Proposed Project impacts on parks would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the demand for parks in the Project vicinity would follow. The No Project Alternative would therefore have less impact than the Proposed Project's less than significant impacts.

v) Library

Under the Proposed Project impacts on library services would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the demand for library services in the Project vicinity would follow. The No Project Alternative would therefore have less impact than the Proposed Project's less than significant impacts.

O. Recreation

Under the Proposed Project impacts on recreation would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the demand for recreational facilities in the Project vicinity would follow. The No Project Alternative would therefore have less impact than the Proposed Project's less than significant impacts.

P. Traffic/Transportation/Parking

Under the Proposed Project impacts associated with the operation of the Project at four of the 24 study intersections, i.e., Fairfax Avenue / Wilshire Boulevard, Curson Avenue / Wilshire Boulevard, Hauser Boulevard / Wilshire Boulevard, and La Brea Avenue / Wilshire Boulevard, would be significant and unavoidable as no mitigation measures are feasible. Under the No Project Alternative, no new land uses would be developed that would generate traffic. Therefore, this Alternative would avoid the significant traffic increases of the Proposed Project, and would therefore have less impact than the Proposed Project, although the area surrounding the Project Site will still experience both ambient traffic growth, and increased traffic from the cumulative impacts of nearby projects.

Q. Utilities

i) Wastewater

Under the Proposed Project, impacts on wastewater would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the flow of wastewater from the Project Site would follow. Therefore, impacts of the No Project Alternative regarding wastewater would be less than the Proposed Project's less than significant impacts.

ii) Water

Under the Proposed Project impacts on water would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the use of water at the Project site would follow. Therefore, impacts of the No Project Alternative regarding water would be less than the Proposed Project's less than significant impacts.

iii) Solid Waste

Under the Proposed Project impacts on solid waste would be less than significant. Under the No Project Alternative, no new construction would occur on the Project Site and therefore no new occupancy uses which could increase the generation of solid waste at the Project site would follow. Therefore, impacts of the No Project Alternative regarding solid waste would be less than the Proposed Project's less than significant impacts.

2. RELATIONSHIP TO PROJECT OBJECTIVES

Although the No Project Alternative would have fewer impacts than the Proposed Project, it would not satisfy any of the Proposed Project objectives other than the mitigation of potential environmental impacts, as listed in Section II, Project Description, of this Draft EIR, because no new development would occur on the Project. Specifically, the No Project Alternative would not meet the following Proposed Project objectives:

- To provide infill commercial development by creating an iconic building in the Miracle Mile community, and implement good planning principles by constructing office uses along a major arterial and transit corridor.
- To provide a development that is compatible and complementary with surrounding land uses.
- To provide adequate parking facilities to serve the Proposed Project tenants and visitors.
- To maximize opportunities for the local and regional economy by constructing an economically viable Project that creates construction job opportunities, and attracts commercial tenants to the Proposed Project.

3. REDUCTION OF SIGNIFICANT PROJECT IMPACTS

The Proposed Project would result in significant and unavoidable impacts regarding aesthetics (shade and shadow), noise (construction), and traffic/transportation (operational). Comparatively, the No Project Alternative would avoid all of the significant and unavoidable Project-related impacts that would occur under the Proposed Project because no new development would occur under No Project Alternative. However, the No Project Alternative would not realize any of the Project Objectives other than the mitigation of the potential environmental impacts.

VI. ALTERNATIVES TO THE PROJECT

B. REDUCED PROJECT ALTERNATIVE

1. DESCRIPTION

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25% (twenty-five percent). The Alternative would involve the demolition of an existing surface parking lot, the construction of a new 10-story, approximately 190,472 square-foot commercial office building and the addition of one new level of parking (approximately 122,076 square feet) to an existing five-level parking structure, adding a total of 413 net new parking spaces.

Employment under this Alternative would be expected to be slightly lower than the Proposed Project, approximately 666 employees, versus the 888 for the Proposed Project. Further, given the lower building square footage, utility and service systems usage would be slightly lower.

Except as described above, other characteristics (e.g., construction schedule, hours of operation, security features and systems, lighting, and utility connections) are assumed to be generally similar to those of the Proposed Project. In addition, all applicable Project Design Features, Regulatory Compliance Measures and Mitigation Measures would be implemented under this Alternative. The potential environmental impacts associated with this Alternative are described below and are compared to the environmental impacts associated with the Proposed Project.

A. Aesthetics

i) Visual Quality/Views

Under the Reduced Project Alternative the existing surface parking lot would be demolished and a new commercial office building and a new level of parking would be added to the existing five-level parking structure. The reduction in size by 25% would reduce the overall height of the building, which under the Proposed Project is approximately 207 feet, to approximately 155 feet and the height of the parking structure to 61.5 feet, as opposed to the Proposed Project's 71.5 feet. Although the height of the structure would be reduced, development of the Project Site would still occur and the building height would exceed the height of the structures that currently exist on the Site. Just as with the Proposed Project, the Reduced Project Alternative would not affect views from a designated scenic highway, corridor, or parkway; neither would it substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. Additionally, the Project Site does not contain any valued view resources such as historic buildings, nor are there any historic buildings within the vicinity that would be negatively impacted by the Proposed Project. The building height under this Alternative would be consistent with the buildings heights for the surrounding uses. Therefore, impacts of the Reduced Project Alternative with respect to visual quality and views would be similar to the Proposed Project and less than significant.

ii) Light and Glare

As discussed in Section IV.A (Impacts Found to be Less Than Significant, A. Aesthetics), the Project Site is located in a well-lit urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior

of structures which passes through windows) and automobile headlights. Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, so that light emanating from any one source contributes to rather than is solely responsible for lighting impacts on a particular receptor. Since development surrounding the Project Site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any notable effect.

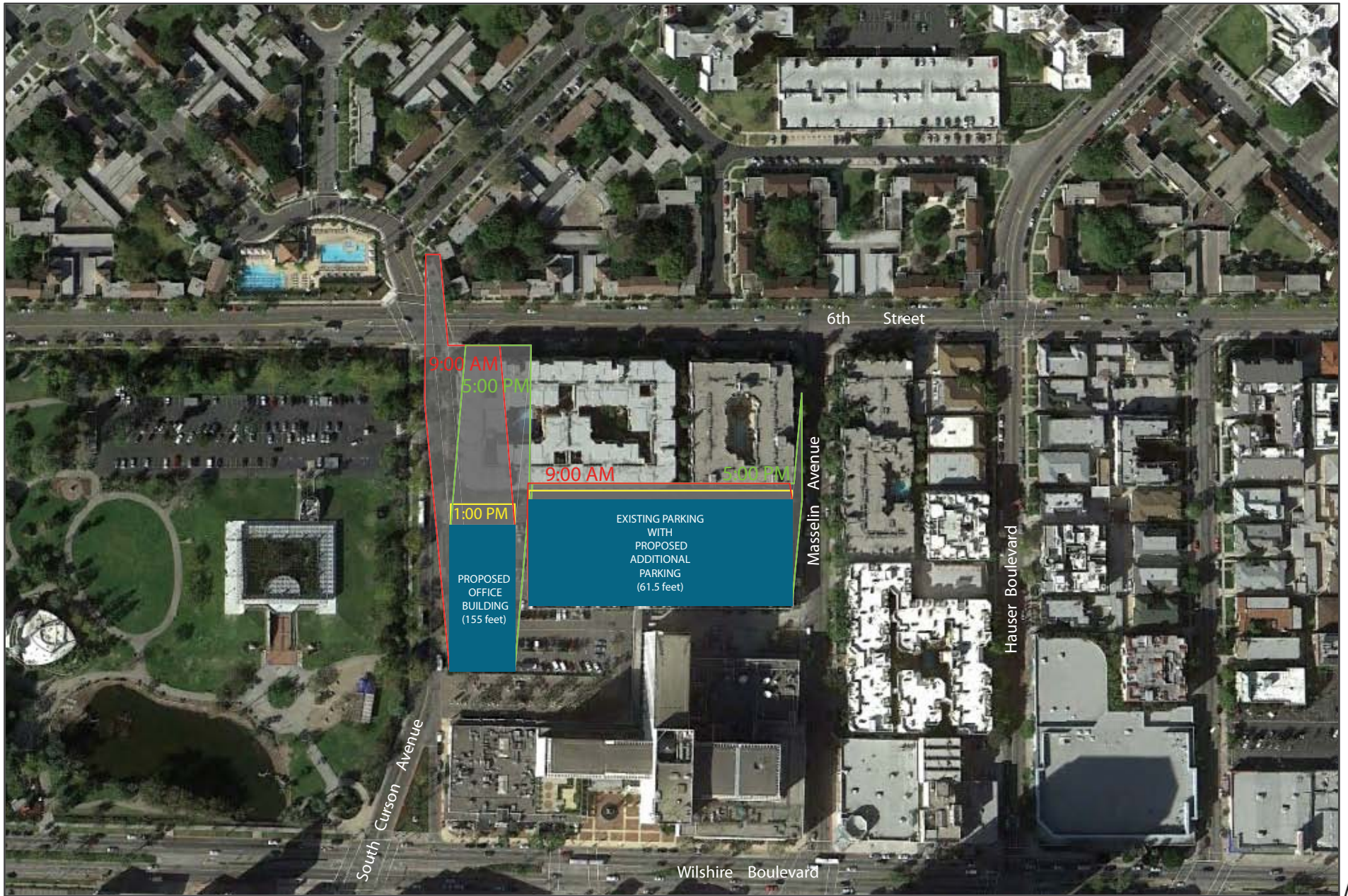
Similar to the Proposed Project, the Reduced Project Alternative would have the potential to alter lighting patterns in the area of the Project Site as compared with existing uses. Exterior lighting would be wall mounted or ground mounted and would be directed downward and shielded away from adjacent residential uses. Wall-mounted security lighting would remain lit all night at each entrance and/or exit, but would be designed to prevent glare onto the adjacent residential property. Furthermore, as with the Proposed Project, the majority of lighting associated with the Alternative would be directed internally to the Project Site itself, away from neighboring land uses. Therefore, interior and exterior lights on the Project Site would not shine directly onto light-sensitive uses, and would not result in light trespass. In addition, while the majority of the lighting would be directed towards the interior of the Project Site and would be directed away from neighboring residential land uses, the implementation of Mitigation Measure AES-2 would ensure that any new light sources would not create significant lighting impacts on nearby residences. Therefore, impacts of the Reduced Project Alternative with respect to light and glare would be similar to the Proposed Project and less than significant.

iii) Shade/Shadow

Under the Reduced Project Alternative, the new office building would be 10 stories (approximately 155 feet tall) while the height of the existing parking structure would be increased to 61.5 feet. Similar to the Proposed Project, under the Reduced Project Alternative the new development would cast shadows on nearby shade-sensitive land uses (refer to Figure VI-1). Therefore, while the shade and shadow impacts of the Reduced Project Alternative would be less than the Proposed Project, due to reduced building height, they would remain significant and unavoidable, the same as the Proposed Project.

B. Agricultural and Forestry Resources

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25% (twenty-five percent). No significant impacts related to agriculture or forestry resources have been identified under the Proposed Project. Therefore, impacts related to agriculture or forestry resources associated with the Reduced Project Alternative would be the same as under the Proposed Project, and there would be no impact.



Source: Google Earth and EcoTierra Consulting, January 2014.

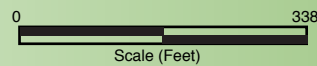


Figure VI-1
25% Reduction Alternative
Proposed Summer Solstice Shadows

C. Air Quality

i) Construction Impacts

Under the Reduced Project Alternative, overall construction activity would be less than the Proposed Project because of the decreased activity that would be required to construct the smaller office building and single story addition to the parking structure. However, daily construction emissions under the Alternative would be similar to the Proposed Project because the same equipment and similar levels of daily construction activity would occur under the Alternative. As such, as discussed Section IV.C. (Air Quality) and similar to the Proposed Project, the mass daily construction-related emissions generated during the Project construction phase would not exceed the thresholds of significance recommended by the SCAQMD. Further, emissions during the construction phases would not exceed the SCAQMD's LST for the specified pollutants. Therefore, impacts of the Reduced Project Alternative with respect to construction emissions would be similar to the Proposed Project and less than significant.

ii) Operational Impacts

Under the Reduced Project Alternative, 25% less square footage and uses would be constructed as compared with the Proposed Project. Therefore, under the Reduced Project Alternative, traffic generation would be less than the Proposed Project. The Reduced Project Alternative would result in the lower levels of regional operational emissions, local pollutant concentrations and CO concentrations at nearby intersections as compared to the Proposed Project. Therefore, impacts under the Reduced Project Alternative would be less than the Proposed Project and less than significant.

D. Biological Resources

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. Impacts to biological resources are potentially significant as a result of the construction of the Proposed Project. However, with the implementation of Compliance Measure BIO-1, impacts of the Proposed Project would be less than significant. Therefore, impacts related to biological resources associated with the Reduced Project Alternative would be similar to the Proposed Project's less than significant impacts.

E. Cultural Resources

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. Impacts to archaeological resources, human remains and paleontological resources are potentially significant as a result of the construction of the Proposed Project. However, implementation of Mitigation Measures CUL-1 through CUL-3 would ensure that potential impacts would be less than significant. Therefore, impacts related to cultural resources associated with the Reduced Project Alternative would be similar to the Proposed Project's less than significant impacts.

F. Geology and Soils

The extent of Project Site development and the types of land uses that would be developed under the Reduced Project Alternative would be similar to those under the Proposed Project. However, the height and density of the Proposed Project would be reduced by approximately 25%.

i) Seismic Fault Rupture

Under the Reduced Project Alternative the Project Site would continue to be subject to the same potential effects associated with seismic fault rupture that would occur as under the Proposed Project. With the implementation of mitigation measure GEO-1, impacts related to potential ground rupture would be less than significant. Therefore, similar to the Proposed Project, related impacts would be less than significant under the Reduced Project Alternative.

ii) Strong Seismic Ground Shaking

Under the Reduced Project Alternative the Project Site would continue to be subject to the same potential effects associated with strong seismic ground shaking that would occur as under the Proposed Project. However, this impact will be reduced to a less than significant level by following all relevant California Building Code and UBC seismic standards as well as the recommendations of the Geotechnical Report, as required by Mitigation Measure GEO-1. Therefore, similar to the Proposed Project, impacts related to this issue would be less than significant under the Reduced Project Alternative.

iii) Seismic-related ground failure, including liquefaction.

According to City of Los Angeles Department of Planning, Zone Information and Map Access System², the Site is not located within an area identified as having potential for liquefaction. In addition, according to the City of Los Angeles General Plan, Safety Element (1996)³, the Site is not located within an area identified as having potential for liquefaction. Further, the Site is not located in an area that is mapped as a potentially liquefiable zone according to the California Department of Mines and Geology (now referred to as the California Geological Survey) Seismic Hazard Zone Map (CDMG, 1999).

Under the Reduced Project Alternative the Project Site would continue to be subject to the same potential effects associated with liquefaction and liquefaction-induced settlement that would occur under the Proposed Project. All new construction would comply with the City of Los Angeles UBC, which is designed to assure safe construction and includes building foundation requirements appropriate to the conditions present at the Project Site. Additionally, mitigation measure GEO-1 requires that the design and construction of the Project shall conform to recommendations of the Geotechnical Report and a qualified structural engineer. Therefore, similar to the Proposed Project, related impacts would be less than significant under the Reduced Project Alternative.

² City of Los Angeles Department of Planning, *Zone Information and Map Access System*, 5701 W. Wilshire Blvd (et al), website: <http://zimas.lacity.org/>, November 28, 2012.

³ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Safety Element Exhibit B: Areas Susceptible to Liquefaction in the City of Los Angeles*, May 1995, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed January 8, 2013.

iv) Landslides

The Project Site and surrounding vicinity slope gently to the south. The Project Site is in a densely developed area of the City and there are no known landslides near the site, nor is the site in the path of any known or potential landslides. The probability of landslides, including seismically induced landslides, is considered to be very low at the Project Site. Therefore, similar to the Proposed Project, no impact would occur under the Reduced Project Alternative.

v) Erosion and Topsoil

Under the Reduced Project Alternative the Project Site would continue to be subject to the same level of site disturbance (i.e. demolition and grading) that would occur as under the Proposed Project. With implementation of the applicable grading and building permit requirements and the implementation of applicable BMPs, less-than-significant impacts would occur related to erosion or loss of topsoil. Therefore, similar to the Proposed Project, impacts related to this issue would be less than significant under the Reduced Project Alternative.

vi) Liquefaction/Lateral Spreading and Seismic-Induced Settlement

Potential impacts with respect to liquefaction potential were determined to be less than significant based on the analysis presented, above. With respect to lateral spreading, subsidence, or collapse, construction would comply with the City of Los Angeles UBC, which is designed to assure safe construction and includes building foundation requirements appropriate to the conditions present at the Project Site. Additionally, mitigation measure GEO-1 requires that the design and construction of the Project shall conform to recommendations of the Geotechnical Report and a qualified structural engineer. Therefore, similar to the Proposed Project, related impacts would be less than significant under the Reduced Project Alternative.

vii) Expansive Soils

Under the Reduced Project Alternative the Project Site would continue to be subject to the same potential effects associated with expansive soils as under the Proposed Project. All new construction would be required to comply with the City of Los Angeles UBC and the 2007 California Building Code, which include building foundation requirements appropriate to site-specific conditions. The UBC mandates that special foundation design consideration be employed if the Expansion Index is 20, or greater (UBC Table 18-1-B). As required by mitigation measure GEO-1, the design and construction of the Project shall conform to recommendations of Geotechnical Report. Further, structural systems would be designed by a qualified structural engineer which would identify appropriate foundation systems such as drilled pier and gradebeam systems or driven piles and structural gradebeam systems should Site soils be found to have an Expansion Index of 20 or greater. With compliance with existing regulations and implementation of all site-specific requirements identified in the Geotechnical Report, impacts associated with expansive soils would be less than significant. Therefore, similar to the Proposed Project, related impacts would be less than significant under the Reduced Project Alternative.

- viii) *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.***

The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. Furthermore, no septic tanks or alternative disposal systems are necessary, nor are they proposed under this Alternative. Therefore, similar to the Proposed Project, no impact would occur.

G. Greenhouse Gases

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. Therefore, under the Reduced Project Alternative, greenhouse gas emissions allocated to the Project would be less than the Proposed Project. Because of decreased total levels of construction activity compared to the project, greenhouse gas emissions would be less than the project over the entire construction period. The Reduced Project would have lower traffic generation than the Proposed Project, which is the principal source of operational greenhouse gas emissions. Accordingly, impacts under the Reduced Project Alternative would be less than the Proposed Project during both the construction the operational phases; and similar to the Proposed Project, both would be less than significant.

H. Hazards and Hazardous Materials

- i) *Routine Transport, Use, or Disposal of Hazardous Materials***

Any development of the Project site that includes removal of the existing structures from the site, excavation, and construction that would include the use of solvents, paints, and petroleum products would result in impacts similar to those identified for the Proposed Project. Furthermore, similar to the Proposed Project materials would be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials include but are not limited to lacquer thinner, chemicals for weed control, and glass cleaners. However, all potentially hazardous materials transported, stored, offered for sale, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, impacts related to hazardous materials under the Reduced Project Alternative would be similar to the Proposed Project's less than significant impacts.

- ii) *Historic Uses***

As discussed in Section IV.F. (Hazards and Hazardous Materials), the review of historical site use identified that the property has been used for commercial purposes since 1950. No evidence of the past use, treatment, storage, disposal or generation of hazardous substances were identified in association with the current or historical use of the property. Therefore, similar to the Proposed Project, there would be no impacts associated with this issue.

iii) Storage Tanks

As discussed in Section IV.F. (Hazards and Hazardous Materials), the only above-ground or underground storage tanks identified on or in the vicinity of the Project Site were the two USTs that were formerly located on the Project Site immediately south of the portion of the Project Site to be redeveloped. Therefore, similar to the Proposed Project, since these USTs have been removed, there would be no risk of upset or impact from either USTs or ASTs.

iv) Asbestos-Containing Materials

As discussed in Section IV.F. (Hazards and Hazardous Materials), the Proposed Project Site contains a surface parking lot and a five-story parking structure built in 1983. The structure is built of steel-reinforced concrete with metal railings used throughout the stairwells. Given the date of construction and the type of materials used, no building components containing suspect ACMs were identified during the site inspection. Therefore, similar to the Proposed Project, there would be no impacts associated with an exposure to ACMs during construction.

v) Lead-Based Paint

As discussed in Section IV.F. (Hazards and Hazardous Materials), the portion of the Proposed Project Site to be redeveloped contains a surface parking lot and a five-story parking structure built in 1983. The structure is built of steel-reinforced concrete with metal railings used throughout the stairwells. Given the date of construction and the type of materials used, no building components containing suspect LBP were identified during the site inspection. Therefore, similar to the Proposed Project, there would be no impacts associated with an exposure to LBP during construction.

vi) Methane

As discussed in Section IV.F. (Hazards and Hazardous Materials), Chapter IX, Article 1, Division 71, Section 91.7103 of the LAMC, also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. The Project Site, as with every other property in the Project vicinity, is located within a Methane Hazard Zone, as designated by LADBS. Due to the potential environmental risk associated with Methane Hazard Zones, properties within a Methane Hazard Zone require methane testing and mitigation upon (re)development. In compliance with this requirement, soil-gas testing was conducted in November 2012 which confirmed methane gas concentrations of 8,000 to 402,000 ppmv beneath the Project Site.

Methane Seepage Regulations base the required methane mitigation system on the Site Design Level. There are five site design levels based on the methane concentration at the Project Site. Level I is applicable to concentration levels of 0-100 parts per million by volume (ppmv), Level II is applicable to concentrations of 101-1,000 ppmv, and so on up to Level V for concentrations greater than 12,000 ppmv.

Based on the results of the soil-gas testing the Proposed Project would be required to comply with Site Design Level V of the City's Methane Seepage Regulations, which is applicable to sites with methane concentration of 12,000 ppmv and over. Pursuant to the requirements of the methane regulations, the methane mitigation system may require, but not be limited to, a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within

the building, and installing a gas (methane) detection system. Design of the methane mitigation system would be confirmed and approved by the DOGGR, LADBS and LAFD prior to the issuance of building permits for the Proposed Project. Standard Compliance Measure HAZ-1 ensures compliance with City code and regulations. Standard Compliance Measure HAZ-2 has been included to ensure the protection of construction workers from the potential for methane explosion during earth moving and foundation construction activities.

In addition, the Phase I ESA recommends that a contingency should be provided for handling and potential offsite disposal of natural petroleum impacted soils should they be encountered during future site construction activities. Mitigation Measure HAZ-3 provides for the mitigation of this possibility.

As with the Proposed Project, the Reduced Project Alternative would implement Standard Compliance Measures HAZ-1, HAZ-2 and Mitigation Measure HAZ-3. Therefore, similar to the Proposed Project, potential impacts from methane gas and petroleum impacted soil would be less than significant.

vii) Proximity to a School

The closest schools to the Project Site are Cathedral Chapel School (755 S. Cochran Avenue) located approximately one-half mile southeast of the Project Site, and Hancock Park Elementary School (408 S. Fairfax Avenue) located approximately one-half mile northwest of the Project Site. There are no other schools within 0.25 miles of the Project Site. However, the George C. Page Museum, approximately 200 feet west of the Project Site, hosts numerous primary and secondary school children on field trips on a regular basis. As the Alternative, similar to the Proposed Project, will comply with all standards, regulations, and good housekeeping practices, it is not anticipated to emit any hazardous emissions during construction or operation. Further, implementation of Mitigation Measure HAZ-1 would prevent the build-up of methane gas at the Project Site to avert the risk of fire or explosion. Therefore, the Alternative, similar to the Proposed Project, is not expected to adversely affect Cathedral Chapel School, Hancock Park Elementary School or visitors to the George C. Page Museum, and impacts would be less than significant.

viii) Proximity to an Airport or Private Airstrip

The closest public airports to the Project Site are the Burbank Airport, Santa Monica Airport and the Los Angeles International Airport (LAX). However, neither of these airports is located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area⁴, nor is it located in the vicinity of a private airstrip. Therefore, similar to the Proposed Project, no impact would occur.

ix) Emergency Response Plan

The Project Site is not located on or near an adopted emergency response or evacuation route.⁵ Further, development of the Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Therefore,

⁴ ZIMAS Op Cit.

⁵ Safety Element, Op cit.

similar to the Proposed Project, the Alternative would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and no impact would occur.

x) Wildland Fire

The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Fire High Fire Hazard Severity Zone (VHFHSZ).⁶ Therefore, similar to the Proposed Project, no impact from wildland fires would occur.

I. Hydrology and Water Quality

i) Violation of any water quality standards or waste discharge requirements

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. The Alternative, as with the Proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe).

The Alternative, as with the Proposed Project would comply with the City's Stormwater Low Impact Development (LID) Ordinance, specifically section 3.1.3, that was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012. Following the implementation of the LID Plan, impacts to water quality standards or waste discharge requirements would be less than significant. Therefore, impacts related to water quality standards or waste discharge requirements under the Reduced Project Alternative would be similar to the Proposed Project's less than significant impacts.

ii) Depletion of groundwater supplies or substantial interference with groundwater recharge

Construction of the Alternative, similar to the Proposed Project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Report and by a qualified structural engineer (as required by Mitigation Measure GEO-1), and implementation of an approved LID Plan, impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant, similar to the Proposed Project.

iii) Alteration of an existing drainage pattern of the site or area

The Project Site is almost entirely covered by impervious surfaces and most of the runoff flows to the local stormdrain system during a storm event. The alternative, similar to the Proposed Project, would not increase the amount of impervious surfaces at the Site, the amount of runoff from the Site would not substantially change, and all the runoff associated with the Alternative would be either directed to landscaped areas or directed to the existing stormdrain system and would not encounter unprotected soils. During project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to stringent

⁶ ZIMAS, Op cit.

controls imposed via an approved LID Plan as discussed above. As such, any alteration of the existing drainage pattern would not result in substantial erosion or siltation on- or off-site and impacts related to this issue, similar to the Proposed Project, would be less than significant.

iv) 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

The Project Site is located in a highly urbanized area and is served by existing City storm drain infrastructure. The Project Site, under current conditions, is almost entirely covered with impermeable surfaces. Furthermore, the Project Site is not located adjacent to any stream or river, and project runoff would continue to drain into existing City storm drain infrastructure, particularly in light of the implementation of an approved LID Plan. Therefore, the Alternative, similar to the Proposed Project would not have the potential to result in flooding due to altered drainage patterns and impacts would be less than significant.

v) Place housing within a 100-year flood hazard area or place within a 100-year flood hazard area structures which would impede or redirect flood flows

The Project Site is not in an area designated as a 100-year flood hazard area.⁷ The Project Site is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. Similar to the Proposed Project, no impact would occur

vi) 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

The Project Site is not located within a potential inundation area.⁸ As such, similar to the Proposed Project, there would be no impacts related to potential inundation from the failure of a levee or dam.

vii) Tsunamis, Inundation, Seiches, and Flooding

The Project Site is located at least 11 miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. Furthermore, the Project Site is located in the highly urbanized Wilshire Center community of the City, where little open space exists. Therefore, the potential for mudflows to impact the Project Site would also be highly unlikely. As such, similar to the Proposed Project, there would be no impacts related to risk of loss, injury, or death by seiche, tsunami, or mudflow

⁷ *Navigate LA, Op cit.*

⁸ *City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed January 8, 2013.*

J. Land Use Planning

i) Land Use Compatibility

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. However, the physical type of development would be the same as the Proposed Project as it relates to building layout. Therefore, the Reduced Project Alternative would be generally compatible with the surrounding uses in terms of land use, density, and building height and would not disrupt, divide, or isolate the existing area. Further, as a result of reduced building height, under the Reduced Project Alternative, land use compatibility impacts would be less than the Proposed Project, although impacts of the Proposed Project with respect to land use compatibility would be less than significant.

ii) Land Use Plans/Zoning

Under the Reduced Project Alternative, 25% less square footage would be constructed as the Proposed Project. As discussed in Section IV.G. (Land Use), following the approvals for the requested discretionary actions the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, including the mandate of SB 375, the City of Los Angeles General Plan, the Wilshire Community Plan, the LAMC Zoning Code, the Miracle Mile Community Design Overlay (CDO), the City of Los Angeles Walkability Checklist and SCAG's RCPG. Therefore, similar to the Proposed Project, land use plans/zoning impacts would be less than significant.

K. Mineral Resources

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. No significant impacts related to mineral resources have been identified under the Proposed Project. Therefore, impacts related to mineral resources associated with the Reduced Project Alternative would be the same as under the Proposed Project, and there would be no impact.

L. Noise

i) Construction Impacts

Under the Reduced Project Alternative, overall construction activity would be less than the Proposed Project because of the smaller building and parking structure addition. However, since similar equipment would be utilized to construct the Alternative, the short-term construction noise impacts under the Alternative would be similar to the Proposed Project in magnitude, but shorter in duration. As such, although the construction noise impacts of the Alternative would be less than the Proposed Project, given the proximity of sensitive receptors, the impacts would remain significant and unavoidable.

ii) Operational Impacts

Noise impacts resulting from increased vehicle traffic and operational activities would be the less than the Proposed Project since trip generation would be less under the Alternative as under the Proposed

Project. Overall, the operational noise impacts of the Reduced Project Alternative would be less than the Proposed Project and less than significant.

M. Population and Housing

Under the Reduced Project Alternative, the height and density of the Proposed Project would be reduced by approximately 25%. As discussed in Section IV.A (Impacts Found to be Less Than Significant, J. Population and Housing), the Proposed Project would generate approximately 888 new employment opportunities, which would decrease to approximately 666 under the Alternative. Impacts related to population and housing under the Proposed Project would be less than significant. Therefore, impacts related to population and housing associated with the Reduced Project Alternative would be the same as under the Proposed Project, and would be less than significant.

N. Public Services

i) Fire

Under the Reduced Project Alternative, the 25% less square footage and uses would be constructed as compared with the Proposed Project. The LAFD has a fire station within 1.5 miles, which houses a truck and engine company. Further, the LAFD has stated that no special concerns related to the Proposed Project.⁹ Therefore, since the LAFD could adequately serve the Project without the addition of a new or expanded station, the impact related to fire protection would be less than significant. Therefore, impacts to fire protection services under the Reduced Project Alternative would be the same as the Proposed Project's less than significant impacts.

ii) Police

Under the Reduced Project Alternative 25% less square footage would be constructed as with the Proposed Project. At full buildout, the Reduced Project Alternative would generate approximately 666 employees, which is 25% less than the Proposed Project. The Alternative, similar to the Proposed Project would incorporate crime prevention measures into Project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional lighting to enhance public safety. Given the already highly urbanized nature of the surrounding area, development of the Alternative, similar to the Proposed Project, is not expected to require the construction of a new or expanded police station. Impacts of the Reduced Project Alternative related to police protection would be similar to the Proposed Project and less than significant

iii) Schools

The Proposed Project would redevelop an existing commercial site in a highly urbanized area in the Miracle Mile district. Under the Reduced Project Alternative 25% less square footage would be constructed as with the Proposed Project. The Proposed Project would not generate any permanent residents. Similar to the Proposed Project, the approximately 666 people that would be employed under the Alternative are not anticipated to generate significant numbers of new students that would

⁹ *Written (via email) correspondence from Captain Luke Milick, Los Angeles Fire Department, February 14, 2013.*

be introduced to Project area schools. As such, the Alternative would not exceed the capacity of any existing or proposed schools. Furthermore, although the Alternative's impact to schools would be less than significant, the payment of school fees in conformance with SB 50 would be mandatory, and therefore no impact would occur with respect to schools, similar to the Proposed Project.

iv) Parks

The Proposed Project would redevelop an existing commercial site in a highly urbanized area in the Miracle Mile district. Under the Reduced Project Alternative 25% less square footage would be constructed as with the Proposed Project. In general, employees of commercial sites are less likely to patronize parks during working hours as they are more likely to use parks and recreational facilities near their homes during non-work hours. The Alternative, similar to the Proposed Project, would not introduce any permanent residents to the Project area. As such, the Alternative would not be anticipated to increase the demand for parks in the vicinity. Therefore, under the Reduced Project Alternative, no impact would occur with respect to demand for parks, similar to the Proposed Project.

v) Other public facilities (Libraries)

The Alternative, similar to the Proposed Project, would not introduce any permanent residents to the Project area, and as such, would not be anticipated to increase the demand for library facilities in the vicinity; in general, employees of commercial sites are less likely to patronize libraries during working hours, as they are more likely to use library facilities near their homes during non-work hours. Therefore, similar to the Proposed Project, no impact would occur with respect to library demand.

O. Recreation

Under the Proposed Project impacts on recreation would be less than significant. Under the Reduced Project Alternative, 25% less square footage would be constructed. Therefore, similar to the Proposed Project, no impact would occur with respect to recreation.

P. Traffic/Transportation

The Reduced Project Alternative would develop an office building with 190,472 gross square feet, which would be a 25% reduction from the Proposed Project. This Alternative would generate 1,053 net daily trips, including 173 AM and 181 PM peak-hour trips. Compared to the Proposed Project, the Reduced Project Alternative would generate approximately 335 fewer net daily trips, including 55 fewer AM trips and 61 fewer PM peak-hour trips, as compared to the Proposed Project. It is anticipated that these levels of trip generation would result in significant and unavoidable impacts at three study intersections, including one that is a CMP arterial monitoring location:

Curson Ave/Wilshire Blvd

Hauser Blvd/Wilshire Blvd

La Brea Ave/Wilshire Blvd

The Proposed Project is expected to result in significant and unavoidable impacts at four study intersections, including one that is a CMP monitoring arterial location. Accordingly, impacts of the Reduced Project would be less than the Proposed Project, but would still be significant and unavoidable,

similar to the Proposed Project. The levels of trip generation associated with the Reduced Project Alternative are anticipated to result in less-than-significant impacts on CMP freeway monitoring locations and residential local streets. The transit trips generated by this Alternative would average approximately 3.5 and 3.9 persons per bus during the respective AM and PM peak hours, which are anticipated to have a less-than-significant impact on public transit, as adequate seating capacity would remain. It is anticipated that this Alternative would provide parking to meet City requirements; therefore, no significant parking impact is anticipated. For the construction of this Alternative, it is anticipated a Construction Staging and Traffic Management Plan would be implemented; that sufficient and proximate construction worker parking would be provided; that no streets would be closed; that adequate pedestrian and emergency vehicular access would be provided; that construction materials and equipment would be stored on-site; and that the level of haul truck and delivery truck trips would not significantly impact the roadway system. Accordingly, it is anticipated that this Alternative's construction-related impacts on traffic operations, parking, pedestrian and vehicular access, emergency access, and bus stops would be less than significant, similar to the Proposed Project.

Q. Utilities

i) Sewer

Under the Reduced Project Alternative, the Project Site would be developed with 25% less total square footage as the Proposed Project. As such, the demand for wastewater treatment facilities and conveyance infrastructure under the Reduced Project Alternative would be less than that of the Proposed Project. Therefore, impacts of the Reduced Project Alternative regarding wastewater, as with the Proposed Project, would be less than significant.

ii) Water

Under the Reduced Project Alternative, the Project Site would be developed with 25% less total square footage as the Proposed Project. As such, the demand for water supply, water treatment facilities, and water conveyance infrastructure under the Reduced Project Alternative would be the less than that of the Proposed Project. Therefore, impacts of the Reduced Project Alternative regarding water, as with the Proposed Project, would be less than significant.

iii) Solid Waste

Under the Reduced Project Alternative, as with the Proposed Project, the existing surface parking lot and would be demolished. Following this demolition, the Project Site would be redeveloped with 25% less total square footage as the Proposed Project. The analysis in this EIR concluded that existing capacity at the landfills that would accept the Proposed Project's demolition/construction waste could accommodate the Proposed Project's demand, and impacts would be less than significant. The Reduced Project Alternative would decrease the amount of solid waste exported during construction, the existing capacity at the landfills that would accept this waste could accommodate the Alternative's demand, and similar to the Proposed Project, impacts would be less than significant.

In addition, the land uses would be the same as those proposed under the Proposed Project and the demand for landfill capacity during operation under this Alternative would be 25% less than that of the Proposed Project. Therefore, impacts of the Reduced Project Alternative regarding solid waste, similar to the Proposed Project, would be less than significant.

2. RELATIONSHIP TO PROJECT OBJECTIVES

The Reduced Project Alternative would meet some of the Project Objectives as listed in Section II (Project Description), of this EIR, by providing a commercial project to replace the surface parking lot on the Project Site. Specifically, this Alternative would meet the following Proposed Project objectives to the same extent as the Proposed Project:

- To provide infill commercial development by creating an iconic building in the Miracle Mile community, and implement good planning principles by constructing office uses along a major arterial and transit corridor.
- To provide a development that is compatible and complementary with surrounding land uses.
- To provide adequate parking facilities to serve the Proposed Project tenants and visitors.
- To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.

Due to the reduced project size, this Alternative would meet the following Proposed Project objective to a lesser extent as the Proposed Project:

- To maximize opportunities for the local and regional economy by constructing an economically viable Project that creates construction job opportunities, and attracts commercial tenants to the Proposed Project.

3. REDUCTION OF SIGNIFICANT PROJECT IMPACTS

The Reduced Project Alternative would not eliminate the significant and unavoidable impact of the Proposed Project regarding shade and shadow, construction noise and traffic impacts as compared to the Proposed Project.

VI. ALTERNATIVES TO THE PROJECT

C. ALTERNATIVE PROJECT CONFIGURATION ALTERNATIVE

1. DESCRIPTION

Under the Alternative Project Configuration Alternative the existing surface parking lot would be demolished, approximately 249,500 square feet of new commercial office space would be constructed and two new levels of parking would be added to the existing five-level parking structure. The new commercial space would be configured such that a 10-story building would be constructed on the site of the existing surface parking lot with additional commercial space constructed over the existing retail/restaurant space connected with a bridge over the existing entry drive that would visually and functionally tie the spaces together. Refer to Figures VI-2 and VI-3.

The only discernible difference in the Alternative Project Configuration Alternative from the Proposed Project would be the shifting of building mass toward Wilshire Boulevard, achieved through the shorter main office tower and location of building mass over the existing entry way on Curson Avenue and the existing one-story retail/restaurant spaces that face Wilshire Boulevard. New commercial square footage under the Alternative would be the same as the Proposed Project; square footage for the two new levels of parking would remain the same as the Proposed Project, approximately 162,768 square feet.

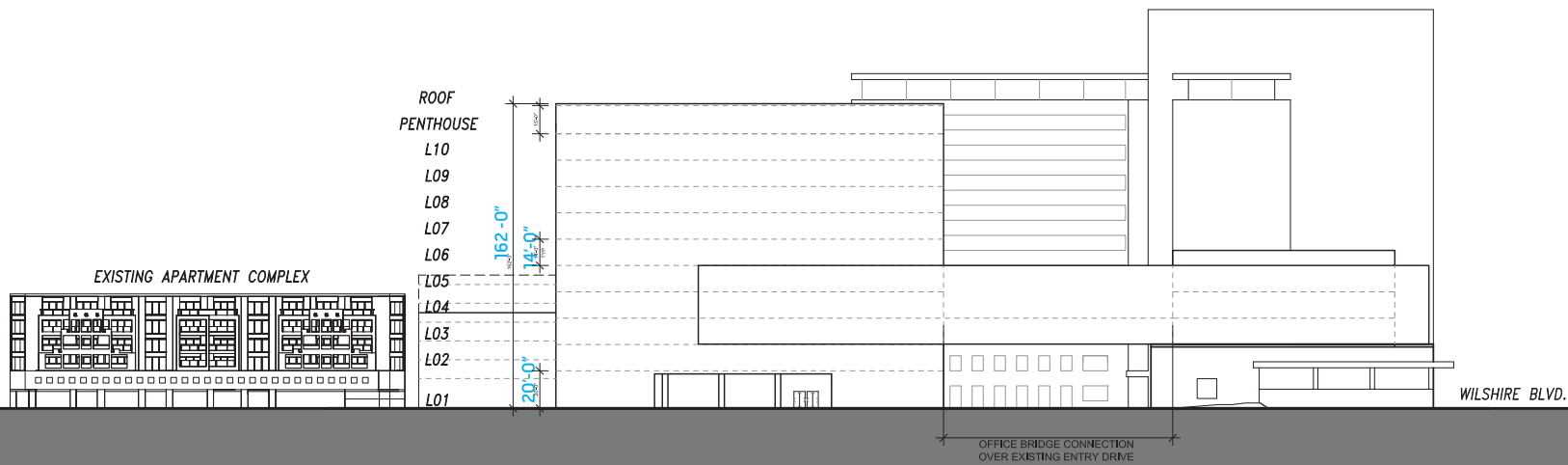
The 10-story building would be approximately 162 feet high, with the extension over the retail spaces approximately 76 feet; following the addition, the parking structure would be approximately 72 feet high. The Alternative Project Configuration Alternative, as with the Proposed Project, would provide a total of 2,040 parking spaces; an addition of 550 net new spaces.

Except as described above, all other characteristics under this Alternative (e.g., construction schedule, hours of operation, employment, security features and systems, lighting, utility and service systems usage and utility connections) are assumed to be generally similar to those of the Proposed Project. In addition, all applicable Project Design Features, Regulatory Compliance Measures and Mitigation Measures would be implemented under this Alternative. Thus, the potential environmental impacts associated with this Alternative, with the exception of potential shade and shadow impacts which are discussed below, would be similar to the environmental impacts associated with the Proposed Project.

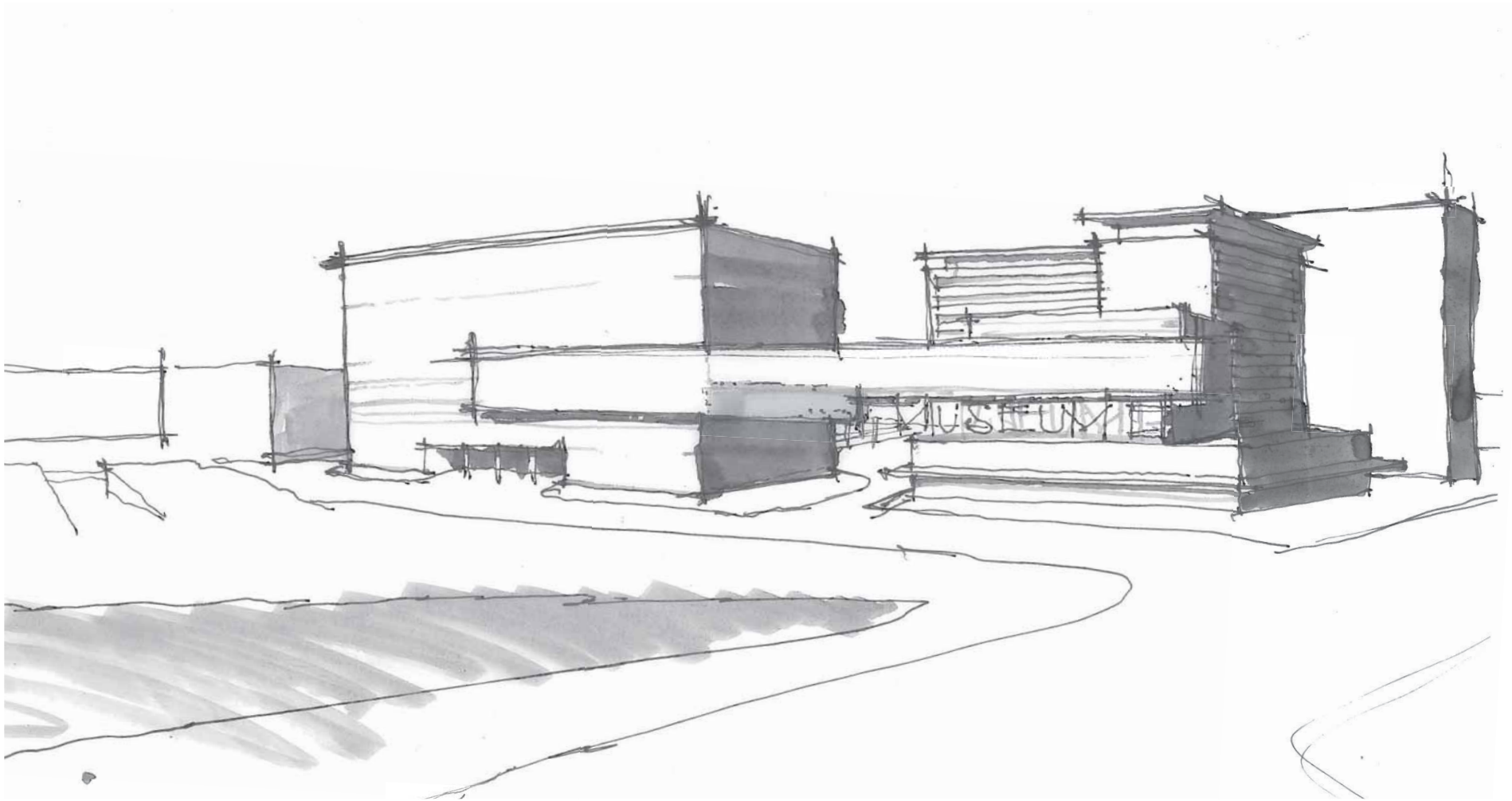
Aesthetics

iv) Shade/Shadow

Under the Alternative Project Configuration Alternative, the tallest portion of new office building would be 10 stories (approximately 162 feet tall) while the height of the existing parking structure would be increased to 72 feet. Similar to the Proposed Project, under the Alternative Project Configuration Alternative the new development would cast shadows on nearby shade-sensitive land uses. (Refer to Figure VI-4). Therefore, while the shade and shadow impacts of the Alternative Project Configuration Alternative would be less than the Proposed Project due to reduced building height, they would remain significant and unavoidable, the same as the Proposed Project.



Source: Jerde, August 2013.



Source: Jerde, August 2013.



Source: Google Earth and EcoTierra Consulting, April 2013.

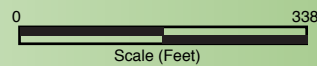


Figure VI-4
Alternative Project Configuration
Proposed Summer Solstice Shadows

2. RELATIONSHIP TO PROJECT OBJECTIVES

The Alternative Project Configuration Alternative would meet the Project Objectives as listed in Section II (Project Description), of this EIR, by providing a commercial project to replace the surface parking lot on the Project Site. Specifically, this Alternative would meet the following Proposed Project objectives to the same extent as the Proposed Project:

- To provide infill commercial development by creating an iconic building in the Miracle Mile community, and implement good planning principles by constructing office uses along a major arterial and transit corridor.
- To provide a development that is compatible and complementary with surrounding land uses.
- To provide adequate parking facilities to serve the Proposed Project tenants and visitors.
- To maximize opportunities for the local and regional economy by constructing an economically viable Project that creates construction job opportunities, and attracts commercial tenants to the Proposed Project.
- To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.

3. REDUCTION OF SIGNIFICANT PROJECT IMPACTS

As the Alternative Project Configuration Alternative would construct essentially the same square footage as the Proposed Project, with a shorter office tower, the Alternative would have the same significant and unavoidable impacts as the Proposed Project regarding shade and shadow, construction noise and operational traffic.

VI. ALTERNATIVES TO THE PROJECT

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project Alternative would be environmentally superior to the Proposed Project, as it would avoid all of the significant and unavoidable impacts of the Proposed Project. The No Project Alternative would not, however, meet any of the objectives of the Proposed Project.

In accordance with CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the “no project” Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the alternatives analysis provided above and in Table VI-1, Alternatives Comparison, the Reduced Project Alternative would be environmentally superior to the Proposed Project. The Reduced Project Alternative would reduce, but not avoid, the significant and unavoidable impacts of the Proposed Project regarding aesthetics (shade and shadow) and traffic/transportation (impacting three intersections, as opposed to the four intersections impacted under the Proposed Project). The Reduced Project Alternative would have the same significant and unavoidable impacts as the Proposed Project with respect to noise (construction). The Reduced Project Alternative would meet most of the objectives of the Proposed Project, but would provide 207 fewer jobs (666, as opposed to 873) as the Proposed Project.

**Table VI-1
Alternatives Comparison**

Impact Area	Proposed Project Impact With Mitigation	No Project Alternative	Reduced Project Alternative	Alternative Project Configuration
Aesthetics				
Visual Quality	Less Than Significant	Less	Similar	Similar
View Obstruction	Less Than Significant	Less	Similar	Similar
Light and Glare	Less Than Significant	Less	Similar	Similar
Shade and Shadow	Significant & Unavoidable	Less	Less	Less
Agricultural and Forestry Resources	No Impact	Less	Similar	Similar
Air Quality				
Construction	Less Than Significant	Less	Similar	Similar
Operation	Less Than Significant	Less	Similar	Similar
Biological Resources	Less Than Significant	Less	Similar	Similar
Cultural Resources	Less Than Significant	Less	Similar	Similar
Geology/Soils				
Seismic Fault Rupture	Less Than Significant	Less	Similar	Similar
Strong Seismic Ground Shaking	Less Than Significant	Less	Similar	Similar
Erosion and Topsoil	Less Than Significant	Less	Similar	Similar
Liquefaction	Less Than Significant	Less	Similar	Similar
Subsidence	Less Than Significant	Less	Similar	Similar
Expansive Soils	Less Than Significant	Less	Similar	Similar
Greenhouse Gases	Less Than Significant	Less	Similar	Similar
Hazards and Hazardous Materials	Less Than Significant	Less	Similar	Similar
Hydrology and Water Quality	Less Than Significant	Less	Similar	Similar
Land Use and Planning				
Land Use Compatibility	Less Than Significant	Less	Similar	Similar
Land Use Plans/Zoning	Less Than Significant	Less	Similar	Similar
Mineral Resources	No Impact	Less	Similar	Similar
Noise				
Construction Noise	Significant & Unavoidable	Less	Similar	Similar
Operational Noise	Less Than Significant	Less	Similar	Similar
Population and Housing	Less Than Significant	Less	Similar	Similar

Impact Area	Proposed Project Impact With Mitigation	No Project Alternative	Reduced Project Alternative	Alternative Project Configuration
Public Services Fire Police Schools Parks Libraries	Less Than Significant Less Than Significant Less Than Significant Less Than Significant Less Than Significant	Less Less Less Less Less	Similar Similar Similar Similar Similar	Similar Similar Similar Similar Similar
Recreation	Less Than Significant	Less	Similar	Similar
Traffic/Transportation/Parking Construction Operational	Less Than Significant Significant & Unavoidable	Less Less	Similar Less	Similar Similar
Utilities and Services Wastewater Water Solid Waste	Less Than Significant Less Than Significant Less Than Significant	Less Less Less	Less Less Less	Similar Similar Similar

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VIII. ACRONYMS

- AB Assembly Bill
- AC alternating current
- ACMs asbestos-containing materials
- ADT average daily traffic
- AF acre-feet
- AFY acre-feet per year
- AQMP Air Quality Management Plan
- ASTs above-ground storage tanks
- bgs below ground surface
- BMPs Best Management Practices
- CAA Federal Clean Air Act
- CAAQS California ambient air quality standards
- CA FID California Facility Inventory Database
- Cal/EPA California Environmental Protection Agency
- Caltrans California Department of Transportation
- CARB California Air Resources Board
- CAT Climate Action Team
- CCAA California Clean Air Act
- CCAR California Climate Action Registry
- CCR California Code of Regulations
- CDFG California Department of Fish and Game
- CDO Community Design Overlay
- CEC California Energy Commission
- CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
- cf cubic feet
- CFL compact fluorescent light
- CEQA California Environmental Quality Act
- CFCs chloroflourocarbons
- CFR Code of Federal Regulations
- CH₄ methane
- CIWMB California Integrated Waste Management Board
- CMA Critical Movement Analysis
- CMP Congestion Management Plan
- CNEL Community Noise Equivalent Level
- CO carbon monoxide

- CO₂ carbon dioxide
- CO₂e equivalent mass of CO₂
- COHb carboxyhemoglobin
- CPA Community Plan Area
- CSSA Collection System Settlement Agreement
- CTCSP Coastal Transportation Corridor Specific Plan
- CWA Clean Water Act
- CWC California Water Code
- dB decibel
- dBA A-weighted decibel scale
- DC direct current
- DHS Department of Health Services
- DTSC Department of Toxic Substances Control
- du dwelling unit
- EE energy efficiency
- EIR Environmental Impact Report
- EMI Emissions Inventory Data
- EMS Emergency Medical Services
- FAR floor area ratio
- FEMA Federal Emergency Management Agency
- FHWA Federal highway Administration
- FINDS Facility Index System
- FPPP Fire Protection and Prevention Plan
- ft feet
- GCASP General Construction Activity Stormwater Permit
- GHG greenhouse gas
- gpd gallons per day
- gpm gallons per minute
- GWP global warming potential
- HAZNET Hazardous Waste Information System
- HFCs hydrofluorocarbons
- HHDT Heavy Heavy Duty Diesel Truck
- HHW Household Hazardous Waste
- HOV high-occupancy vehicle
- HSA Hyperion Service Area
- HSWA Hazardous and Solid Waste Act
- HTP Hyperion Treatment Plant
- HVAC heating, ventilation, and air conditioning

- HWCL Hazardous Waste Control Law
- in/sec inches per second
- IPCC Intergovernmental Panel on Climate Change
- IRP Integrated Resources Plan
- ITE Institute of Transportation Engineers
- ITS Intelligent Transportation Systems
- kV kilovolt
- KW-Hours kilowatt-hours
- LAA Los Angeles Aqueduct
- LAAFP Los Angeles Aqueduct Filtration Plant
- LABS Los Angeles Department of Public Works Bureau of Sanitation
- LACC Los Angeles County Code
- LACMTA Los Angeles County Metropolitan Transportation Authority
- LADOT Los Angeles Department of Transportation
- LADWP Los Angeles Department of Water and Power
- LADRP Los Angeles Department of Recreation and Parks
- LAFD Los Angeles Fire Department
- LAMC Los Angeles Municipal Code
- LAPD Los Angeles Police Department
- LAPL Los Angeles Public Library
- LARWQCB Los Angeles Regional Water Quality Control Board
- LAUSD Los Angeles Unified School District
- LAX Los Angeles International Airport
- LBP lead-based paint
- L_{eq} equivalent energy noise level
- L_{max} maximum instantaneous noise level
- L_{min} minimum instantaneous noise level
- LMU Loyola Marymount University
- LNG liquid natural gas
- LOS Level of Service
- LSTs localized significance thresholds
- LUFT leaking underground fuel tank
- Metro Metropolitan Transportation Authority
- $\mu\text{g}/\text{m}^3$ micrograms per cubic meter
- msl mean sea level
- MTA Metropolitan Transportation Authority
- MW mega-watt
- MWD Metropolitan Water District

- NAAQS national ambient air quality standards
- NAHB National Association of Homebuilders
- NERC North American Electric Reliability Council
- N₂O nitrous oxide
- NO₂ nitrogen dioxide
- NOI Notice of Intent
- NOP Notice of Preparation
- NO_x nitrogen oxides
- NPDES National Pollutant Discharge Elimination System
- O₃ ozone
- OSHA Occupational Safety and Health Administration
- Pb lead
- PCBs polychlorinated biphenyls
- pCi/L picoCuries per liter
- PFCs perfluorocarbons
- PM₁₀ respirable particulate matter
- PM_{2.5} fine particulate matter
- ppd pounds per day
- ppm parts per million
- PPV peak particle velocity
- PSI pounds per square inch
- PUC Public Utilities Commission
- RCPG Regional Comprehensive Plan and Guide
- RCRA Resource Conservation and Recovery Act
- RD Reporting District
- RMS root mean square
- ROGs reactive organic gases
- RWQCB Regional Water Quality Control Board
- SARA Superfund Amendment and Reauthorization Act
- SB Senate Bill
- SCAB South Coast Air Basin
- SCAG Southern California Association of Governments
- SCAQMD South Coast Air Quality Management District
- SCG Southern California Gas Company
- sf square feet
- SF₆ sulfur hexafluoride
- SIP State Implementation Plan
- SO₂ sulfur dioxide

- SO₄ sulfates
- SO_x sulfur oxides
- SRCRD Solid Resources Citywide Recycling Division
- SRRE Source Reduction and Recycling Element
- st student
- STIP State Transportation Improvement Program
- SUSMP Standard Urban Stormwater Mitigation Plan
- SWEEPS Statewide Environmental Evaluation and Planning System
- SWPPP Storm Water Pollution Prevention Program
- SWRCB State Water Resources Control Board
- TACs toxic air contaminants
- TIA Transportation Impact Assessment
- TMDLs Total Maximum Daily Loads
- TRUs transportation refrigeration units
- TSCA Toxic Substances Control Act
- U.S. EPA United States Environmental Protection Agency
- USFWS United States Fish and Wildlife Service
- USGS United States Geological Survey
- USTs underground storage tanks
- UWMP Urban Water Management Plan
- V/C volume-to-capacity
- VdB velocity in decibels
- VMT vehicle miles traveled
- VOC volatile organic compound
- WECC Western Electricity Coordinating Council
- WFP Water Facilities Plan
- WSO Water Services Organization