LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

2017011062

DRAFT
ENVIRONMENTAL IMPACT REPORT

222 West 2nd Project

Environmental Case: ENV-2016-3809-EIR
State Clearinghouse No.: 2017011062

Executive Summary

Project Location: 213 South Spring Street, 200–210 South Broadway, and 232–238 West 2nd Street, Los Angeles, California 90012

Community Plan Area: Central City

Council District: 14—Huizar

Project Description: The Project involves the development of a 30-story mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses in Downtown Los Angeles. The 2.71-acre Project Site, which is bounded by South Broadway on the west, West 2nd Street on the north, and South Spring Street on the east, is the future site of the Los Angeles County Metropolitan Transportation Authority Regional Connector 2nd Street/Broadway rail station and portal. The 2nd Street/Broadway rail station will be below grade, with a station portal at the northwest corner of the site at 2nd Street and Broadway. The Metro station and portal are currently under construction. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area and replace a surface parking lot located on the northern portion of the Project Site. An existing five-story parking structure is located on the southern portion of the Project Site and would remain and be reconfigured to provide required automobile and long-term bicycle parking for the Project. The Project also includes a plaza surrounding the Metro portal, which would be integrated with a landscaped paseo located between the proposed building and the existing parking structure to the south. In addition, amenity decks offering a variety of social and community spaces would be provided on various levels of the new building and would include landscaped terraces, rooftop gardens, and gathering spaces. Indoor and outdoor recreational spaces, as well as private balconies, also would be provided.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental

APPLICANT:
CA-LATS South, LLC

March 2019

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the 222 West 2nd Project (Project) and its potential environmental effects, along with a listing of the proposed Project design features and mitigation measures. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included herein are an overview of the purpose, focus, and organization of this Draft EIR; a brief discussion of areas of controversy; a description of the public review process to date for the Project; and a summary of the alternatives to the Project evaluated in this Draft EIR.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to evaluate the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which addresses the significance determinations of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was

distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on January 25, 2017, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Land Use
- Noise
- Population and Housing
- Public Services (including police protection, fire protection, schools, libraries, and parks and recreation)
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems (including water supply and infrastructure, wastewater, and solid waste)
- Energy Conservation and Infrastructure

In addition, although impacts were found to be less than significant pursuant to Public Resources Code (PRC) Section 21099(d), the Draft EIR analyzes aesthetics (visual character, views, light/glare, and shading) for informational purposes only.

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forest resources; objectionable odors; biological resources; human remains; geology and soils; hazardous materials near schools; airport or airstrip-related hazards; interference with an adopted emergency response plan or emergency evacuation plan; wildland fires; hydrology and water quality; physical division of an established community; conflict with an adopted

habitat conservation plan or natural community conservation plan; mineral resources; airport or airstrip-related noise; displacement of people or housing; changes in air traffic patterns; hazardous design features; stormwater drainage facilities; and compliance with federal, state, and local statutes related to solid waste. Therefore, these areas are not analyzed in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.

II. **Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the Project vicinity.

IV. **Environmental Impact Analysis.** This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; greenhouse gas emissions; hazards and hazardous materials; land use; noise; population and housing; public services (police protection, fire protection, schools, libraries, and parks and recreation); transportation/traffic; tribal cultural resources; utilities and service systems (water supply and infrastructure, wastewater, and solid waste); and energy conservation and infrastructure. In addition, aesthetics (visual character, views, light/glare, and shading) is evaluated for informational purposes.

V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Reduced Density Alternative; Office Alternative A (411,000 square feet); Office Alternative B (590,000 square feet); Residential Alternative A (with podium); and Residential Alternative B (without podium).

VI. **Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the Project's mitigation measures. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

VII. **References.** This section lists the references and sources used in the preparation of this Draft EIR.

VIII. **Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. **List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study, NOP, and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation
  - Appendix A.3—NOP Comment Letters
- Appendix B—Technical Appendix for Air Quality and Greenhouse Gas Emissions
- Appendix C— Cultural Resources Appendix
  - Appendix C.1—Historic Report
  - Appendix C.2—Archaeological Memo
  - Appendix C.3—Paleontological Records Search
- Appendix D—Hazards and Hazardous Materials Appendix
  - Appendix D.1—Hazardous Materials Report

  - Appendix D.2—Phase I Environmental Site Assessment
  - Appendix D.3—First Phase I Addendum
  - Appendix D.4—Second Phase I Addendum
- Appendix E—Land Use Appendix
  - Appendix E.1—Broadway Theater and Entertainment District Design Guide
  - Appendix E.2—Downtown Design Guide: Urban Design Standards and Guidelines
  - Appendix E.3—Citywide Design Guidelines
- Appendix F—Noise Calculation Worksheets
- Appendix G—LAPD Response Letters
- Appendix H—LAFD Response Letters
- Appendix I—LAUSD Response Letter
- Appendix J—LAPL Response Letter
- Appendix K—DRP Response Letter
- Appendix L—Traffic Appendix
  - Appendix L.1—Traffic Study
  - Appendix L.2—LADOT Assessment Letter
- Appendix M—Tribal Cultural Resources Report
- Appendix N—Water and Wastewater Appendix
  - Appendix N.1—Water Supply Assessment
  - Appendix N.2—Utilities Report
- Appendix O—Technical Appendix for Energy
- Appendix P—Alternatives Appendix
  - Appendix P.1—Alternatives Traffic Memo
  - Appendix P.2—Alternatives Assumptions and Calculations

- Appendix P.3—Technical Appendix for Alternatives—Air Quality, Greenhouse Gas Emissions and Energy

4. Thresholds of Significance

In 2006, the City published the *L.A. CEQA Thresholds Guide* (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency—in this case, the DCP—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states "because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide."[1]

In light of an evolving regulatory environment, recent case law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

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1 *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.*

5. Existing Project Site Conditions

The Project Site is located in the Central City Community Plan area of the City of Los Angeles (City), within the Civic Center South area of Downtown, approximately 14 miles east of the Pacific Ocean. The 2.71-acre Project Site is specifically located at 213 South Spring Street, 200-210 South Broadway, and 232-238 West 2nd Street, and is bounded by West 2nd Street on the north, South Spring Street on the east, a surface parking lot and a six-story apartment building on the south, and South Broadway on the west.[2] The northern portion of the Project Site consists of a former surface parking lot, which is currently in use as a staging and excavation area for construction of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station and portal. Pursuant to a right-of-entry agreement, Metro has had exclusive control and use of the surface parking area since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until up to September 2021. At that time, control of the surface parking lot (with the exception of the portal area), will revert back to the Applicant (CA-LATS South, LLC). Metro's current plans call for the restoration of a paved surface area on those areas of the northern portion of the Project Site outside of the new Metro portal and plaza area following the completion Metro's construction activities. The surface parking lot previously included 99 vehicular parking spaces.

The southern portion of the Project Site contains a five-story, approximately 67-foot-tall parking structure that includes rooftop parking and two subterranean levels. The structure currently provides 1,460 vehicular spaces, which are used for parking by tenants of Los Angeles Times Square (subject to several off-site parking covenants recorded on the Project Site), as well as public parking for other businesses, commuters, and residents in the immediate area.[3] Access to the parking structure is provided via one driveway on Broadway and two driveways on Spring Street.

Current landscaping on the Project Site is limited to street trees and a narrow landscaped parkway that traverses the center of the site along the northerly edge of the existing parking structure. Trees in these areas include: 19 on-site trees and 12 on-site palms that meet the City's minimum size threshold for regulation as non-protected trees (i.e., trees with a trunk diameter at breast height (dbh) greater than 8 inches); and six street

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[2] *For ease of reference, the roadways in the Project vicinity may be referred to herein without a directional indicator (e.g., Broadway, 2nd Street, and Spring Street). Furthermore, directional references have been simplified (i.e., Broadway actually borders the Project Site to the northwest but is described herein as the west).*

[3] *Off-site parking covenants per County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091.*

trees along Broadway and Spring Street, none of which meet the definition of a protected tree as defined in the City's Municipal Code, although all are at least 8 inches dbh.[4,5] The landscaped parkway also includes shrubs and limited areas of turf, along with park benches.

The Project Site is well served by transit and is located approximately 700 feet from the Civic Center/Grand Park Metro Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street) and 0.48 mile from the Pershing Square Metro Purple and Red Line station. In addition, as previously mentioned, a Metro Regional Connector portal and station are currently under construction on-site. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a ½-mile radius of the Project Site. The site is also served by Metro Bus Lines 2, 4, 30, 33, 35, 40, 45, 68, 83, 84, 92, 302, 330, 728, 733, 745, and Los Angeles Department of Transportation (LADOT) DASH Line D.

The Project Site is located entirely within the Central City Community Plan area, with a land use designation of Regional Center Commercial. The site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Height District 4 with a D limitation allows a floor area ratio (FAR) of 6.0:1. The site is also subject to [Q] conditions, which were established by Ordinance No. 180,871 in 2009 as part of the adoption of the Broadway Theater and Entertainment District Design Guide. The [Q] conditions prohibit certain types of land uses, particularly on the ground floor along the streetwall; dictate building form and massing, including building heights and setbacks along the streetwall, lot coverage requirements for buildings over 150 feet in height, and ground floor treatments; and specify the location of parking and mechanical equipment. Signage regulations were originally included in the [Q] conditions but were later removed by Ordinance No. 184,055 in 2016 and replaced with the Historic Broadway Sign Supplemental Use District (Broadway Sign District). The Broadway Sign District supports and enhances historic preservation, economic development, and revitalization of the Broadway Theater and Entertainment District and allows for a variety of signage that contributes to its historic nature.

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[4] *Palms often are not considered trees because they lack a vascular cambium, which causes tree trunk diameters to expand over time; thus, they are listed separately herein. Palms are not specifically addressed in City requirements.*

[5] *Psomas, Tree Inventory Report for the Tribune—South Parcel Project Site at 213 South Spring Street in the City of Los Angeles, California, Revised September 9, 2016; see Appendix A.*

The Project Site is located in the Greater Downtown Housing Incentive Area, which allows an unlimited number of dwelling units in residential projects.[6] In addition, the Project Site is subject to or located within the following: Broadway Streetscape Master Plan; Transit Priority Area (TPA); City Center Redevelopment Project Area; Los Angeles State Enterprise Zone; Adaptive Reuse Incentive Area; and a Metro Rail Project Area based on construction of the Metro Regional Connector portal and station within the site. In addition, a 5-foot Building Line was established along Broadway by Ordinance No. 75,667.

6. Description of the Proposed Project

a. Project Overview

The Project involves the development of a 30-story, 449-foot-tall, mixed-use building with 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial retail floor area, and 534,044 square feet of office uses.[7,8] The 2.71-acre Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction. Based on a total of 688,401 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 5.83:1, in conformance with the Project Site's [Q]C4-2D-CDO-SN zoning classification and maximum 6.0 FAR.

In general, the proposed uses would be located in distinct areas of the new building. The ground floor would include commercial spaces fronting 2nd and Spring Streets, as well as the interior of the site (i.e., facing the Metro portal and the pedestrian paseo), with a residential lobby and loading area located along Spring Street.[9] Office space would be provided on levels 2 through 22, while the residential uses would be on levels 23 through 30. The proposed residences would include 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units ranging from approximately 650 square feet to 1,630 square feet in size. In addition, a single basement level would house mechanical rooms and storage.

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6 *In addition, residential projects that voluntarily provide a prescribed percentage of affordable housing units may receive further incentives, including but not limited to a density bonus. However, such incentives are still subject to relevant FAR restrictions.*

7 *The building's height would measure 435 feet at the highest roofline and 449 feet at the top of the highest parapet, which would be set back from the roofline.*

8 *Although the Project's residential units ultimately may consist of either condominiums or apartment units, because the Project Applicant proposes to subdivide the residential units for condominium purposes under proposed Vesting Tentative Tract Map No. 74320, they are assumed herein to be condominiums.*

9 *Operating hours for the loading dock would be 24 hours per day, seven days per week.*

The proposed building has been designed as a series of stacked volumes of varying sizes (floorplates), with shifting footprints and alternating types of curtain walls, capped by a bronze-colored (or other metallic) façade. Levels 1 through 7 would comprise one volume and serve as the building podium, with levels 2 through 7 extending over the Metro portal. Levels 8 through 14 would comprise the next volume, which would be stepped back substantially from Broadway and slightly from 2nd Street. Levels 15 through 18 and levels 19 through 26 also would be separate volumes, with the footprint of each shifting back and forth in relation to the adjacent streets. Levels 27 through 30 would comprise the smallest volume, which would be stepped back the furthest from both Broadway and 2nd Street. The highest two volumes, levels 27 through 30 and the eastern half of levels 19 through 26, would include a bronze-colored (or other metallic) façade. Overall, the height and massing of the building would shift away from Broadway toward Spring Street.

The shifting volumes in the building design would create a series of rooftop decks and terraces. Amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents.

A landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street. The Project's landscaping would include drought-tolerant plants including both native and adaptive native plant materials.[10] An efficient irrigation system would be installed in all landscaped areas.

As previously indicated, the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction, would be located at the northwest corner of the Project Site. The at-grade portal would include ticket booths, kiosks, information signs, stairs, escalators, and elevators to serve the subterranean Metro station. The mixed-use building would be built above the Metro portal, with the base of level 2 essentially serving

[10] *Adaptive plants are not native and not invasive, but are able to thrive in the local climate and soil conditions.*

as a roof over the station entrance. A plaza surrounding the portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated and consistent with the paseo, thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. Upon completion, the Metro Regional Connector will consist of a 1.9-mile underground light-rail system connecting the Metro Gold Line to the 7th Street/Metro Center station. The Regional Connector includes the 2nd Street/Broadway rail station, as well as two additional new stations in the Downtown area.

Project lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring buildings and the surrounding area. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Primary façade materials would include glass and various types of metal panels such as anodized aluminum, stainless steel, or bronze-colored metal. Glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

Project signage would be integrated with and compliment the overall aesthetic character of the Project and comply with the standards and goals of the Historic Broadway Sign Supplemental Use District. Project signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types. Wayfinding signs would be located at access points to the on-site parking garage, paseo, commercial and residential entries, corridors, and elevator lobbies. Metro signage would be integrated with the overall signage concept. No off-premises billboard advertising is proposed as part of the Project.

b. Parking and Access

The existing five-level parking structure (plus two subterranean levels) located on the southern portion of the Project Site would remain and be reconfigured to provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces to be provided outside and adjacent to the

parking structure and the new building, as well as within the Metro plaza). The Project would require 628 vehicular parking spaces per Los Angeles Municipal Code (LAMC), based on bicycle parking and transit credit deductions, as well as 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2.[11] Accordingly, surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.[12]

Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

The Project does not include street dedications. However, the following sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards for sidewalk widths:

- Broadway—A 17-foot sidewalk would be provided, consisting of a 12-foot sidewalk in the public right-of-way and a 5-foot sidewalk easement on private property.
- 2nd Street—A 15-foot sidewalk would be provided, consisting of an 8-foot sidewalk in the public right-of-way and a 7-foot sidewalk easement on private property. This may be subject to change pending Metro's final sidewalk widening plans in conjunction with the Regional Connector project on-site.
- Spring Street—A 14-foot sidewalk would be provided in the public right-of-way. Based on the Project plans, there would also be 5 feet of paving on private property between the building and the back of the 14-foot sidewalk. Pursuant to Metro's current plans, Metro may provide an additional 5-foot sidewalk easement in this paved area, which could result in a 19-foot sidewalk area along Spring Street adjacent to the Project's new building. In addition, there would be an 8.5-foot variable width sidewalk easement on private property (including an area that is currently public right-of-way but would be merged into the Project's tract as

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[11] *Parking requirements, including required bicycle parking and credit reductions, are based on LAMC Sections 12.21.A4 (Off-Street Automobile Parking Requirements), 12.21.A4(i) (Exception Downtown Business District), 12.21.A4(k) (Fractional Space), 12.21.A4(p) (Exception for Central City Area), 12.21.A4(x)(3) (Exception for Specified Exception Areas), and 12.21.A16(a)(2) (Bicycle Parking for Commercial Uses).*

[12] *Off-site parking covenants per County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091. Accordingly, under the covenants a total of 69 parking spaces (67 regular spaces and 2 handicap spaces) would be set aside.*

part of the subdivision process) for the portion of Spring Street where the Project's curbside drop-off-area would be located.

c. Sustainability Features

The Project incorporates the principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses. Additionally, a number of specific sustainable design components would be incorporated into the Project, including: water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; energy-efficient lighting; fenestration designed for solar orientation; use of recyclable materials for flooring and demisable partitions in limited amounts; pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking; electric vehicle charging infrastructure; and permeable pavement in the paseo.

The Project also would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and stormwater reuse. As discussed in the Initial Study for the Project, included in Appendix A of this Draft EIR, Best Management Practices (BMPs) would be implemented to collect, detain, and treat runoff on-site before discharging into the municipal storm drain system. Specifically, a stormwater capture and use system (i.e., harvesting system) is proposed on-site and would include a harvesting cistern with a pre-treatment settlement device to filter out trash and debris before water is used to irrigate the landscaped areas of the Project Site. The harvesting cistern capacity would exceed that required for an 85th percentile rainfall event (per LID requirements), thus providing 100 percent treatment.

d. Site Security Features

The Project would include numerous security features, including private on-site security, a closed circuit security camera system, 24-hour controlled access for the office and residential floors, and security patrols of the parking structure. The Project would be designed such that entrances and exits accessing the building, open spaces, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

e. Construction Activities and Phasing

The proposed improvements would replace the former surface parking lot on the northern portion of the Project Site that is currently being used as a construction staging and excavation area for the new on-site Metro 2nd Street/Broadway rail station and portal. In addition, all 37 existing trees on the Project Site are planned for removal and would be replaced with new landscaping, including canopy trees, street trees, and streetscape plantings.

Project construction is expected to occur in one primary phase, with no overlap with construction of the Metro portal and station on-site. As previously discussed, the on-site portal and station are currently under construction, and the Metro Regional Connector line is forecasted to open in 2021. Construction of the Project is anticipated to begin in 2022 and be complete by 2025. Construction activities would occur in accordance with LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. Construction activities would require approximately 7,000 cubic yards of grading, all of which would be exported off-site to Chiquita Canyon Landfill and/or Manning Pit in Irwindale. The haul route to/from Chiquita Canyon Landfill is anticipated to follow segments of 2nd Street, Spring Street, 3rd Street, and Aliso Street in Downtown Los Angeles; CA-110, US-101, CA-170, and I-5; as well as Newhall Ranch Road, SR-126, and Henry Mayo Drive in Castaic. Alternatively, the haul route to/from Irwindale Landfill would follow segments of 2nd Street, Spring Street, 4th Street, Los Angeles Street, El Monte Busway East, and Arcadia Street in Downtown; US-101 and I-10; and Vincent Drive in Irwindale.

7. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but are not limited to, the following:

- Vesting Zone Change to amend Ordinance No. 180,871 to remove [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32- Q);
- Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05);
- Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08- E);

- Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15); and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, revocable permits, foundation permits, and building permits.

In addition, the following agencies are considered Responsible Agencies under CEQA whose approval or permits from whom may be required:

- South Coast Air Quality Management District (SCAQMD);
- Los Angeles Regional Water Quality Control Board (LARWQCB); and
- CRA/LA.

8. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. These areas include Project impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and intersection levels of service during operations; as well as cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance).[13,14] In addition, based on public comments received in the NOP comment letters (provided in Appendix A of this Draft EIR), issues known to be of concern include, but are not limited to: Project impacts related to aesthetics, air quality, historic resources, construction noise, open space, parking, and traffic.

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[13] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[14] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

9. Public Review Process

As previously indicated, the City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on January 25, 2017, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period in accordance with CEQA requirements. Following the public comment period, a Final EIR will be prepared that will include responses to any comments raised regarding this Draft EIR.

10. Summary of Environmental Impacts

Table I-1 on page I-17 provides a summary of the Project's environmental impacts, which are summarized further in the sections that follow.

Table I-1
Summary of Project Impacts

Environmental Issue	Project Impact[a]
A. AESTHETICS (Informational purposes only)	
Construction	Not Significant
Operation	Not Significant
B. AIR QUALITY	
Construction	
Regional and Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Operation	
Regional and Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
C. CULTURAL RESOURCES	
Historic Resources	Less Than Significant
Archaeological Resources	Less Than Significant
Paleontological Resources	Less Than Significant with Mitigation
D. GREENHOUSE GAS EMISSIONS	Less Than Significant
E. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
F. LAND USE	
Land Use Consistency	Less Than Significant
Land Use Compatibility	Less Than Significant
G. NOISE	
Construction	
On-Site Noise	**Significant and Unavoidable**[b]
Cumulative On-Site Noise	**Significant and Unavoidable**[c]
Off-Site Noise	Less Than Significant
Cumulative Off-Site Noise	**Significant and Unavoidable**[d]
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**[e]
Cumulative On-Site Vibration (Human Annoyance)	Less Than Significant
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Cumulative Off-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Operation	
On-Site Noise	Less Than Significant
Off-Site Noise	Less Than Significant

Table I-1 (Continued)
Summary of Project Impacts

Environmental Issue	Project Impact[a]
H. POPULATION AND HOUSING	
Construction	Less Than Significant
Operation	Less Than Significant
I. PUBLIC SERVICES	
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Schools	
Construction	Less Than Significant
Operation	Less Than Significant
Libraries	
Construction	Less Than Significant
Operation	Less Than Significant
Parks and Recreation	
Construction	Less Than Significant
Operation	Less Than Significant
J. TRANSPORTATION/TRAFFIC	
Construction	Less Than Significant
Operation	
Intersection Levels of Service	**Significant and Unavoidable**
Regional Transportation System	Less Than Significant
Access and Circulation	Less Than Significant
Bicycle, Pedestrian, and Vehicular Safety	Less Than Significant
K. TRIBAL CULTURAL RESOURCES	Less Than Significant
L. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Solid Waste	
Construction	Less Than Significant
Operation	Less Than Significant

Table I-1 (Continued)
Summary of Project Impacts

Environmental Issue	Project Impact[a]
M. ENERGY CONSERVATION	
Construction	Less Than Significant
Operation	Less Than Significant

[a] *Cumulative impacts are listed separately if more severe than the corresponding Project impact or if the Project impact is significant and unavoidable but the cumulative impact is not.*

[b] *Impact conclusion assumes Related Project No. 121 (Times Mirror Square project) is completed and occupied prior to or during Project construction. However, if Related Project No. 121 is not occupied by that time, the Project-level impact would be less than significant and no mitigation would be required.*

[c] *Impact conclusion assumes construction of Related Project No. 121 (Times Mirror Square project) would occur concurrently with Project construction; if construction activities are not concurrent, cumulative on-site noise impacts would be less than significant.*

[d] *Impact conclusion assumes peak construction traffic associated with Related Project No. 121 (Times Mirror Square project) would occur concurrently with Project construction; if such construction activities are not concurrent, the cumulative off-site construction noise impact may not occur.*

[e] *Impact conclusion assumes Related Project No. 121 (Times Mirror Square project) is completed and occupied prior to or during Project construction. However, if Related Project No. 121 is not occupied by that time, the Project-level impact would be less than significant.*

Source: Eyestone Environmental, 2019.

a. Less Than Significant Impacts

(1) Aesthetics

As discussed in Section IV.A, Aesthetics, of this Draft EIR, pursuant to SB 743 and ZI 2452, Project impacts related to aesthetics (visual character, views, light and glare, and shading) would not be considered significant. Nonetheless, an analysis is provided for informational purposes.

(2) Air Quality

(a) Applicable Air Quality Plans

(i) Consistency with SCAQMD CEQA Air Quality Handbook and Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

As discussed in Section IV.B, Air Quality, of this Draft EIR, the determination of consistency with the 2016 Air Quality Management Plan (AQMP) is primarily concerned

with the long-term influence of the Project on air quality in the South Coast Air Basin (Air Basin). The Project represents an infill development near transit within an existing urbanized area that would concentrate new residential, commercial/retail, and office uses within a designated High Quality Transit Area (HQTA), thus reducing vehicle miles traveled (VMT). The Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement measures for control of nitrogen oxides (NO_X), particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). Also, the Project would be consistent with the goals and policies of the AQMP for the control of fugitive dust. As the Project would be consistent with the goals and policies of the AQMP, it is considered consistent with the SCAQMD's AQMP. Furthermore, growth resulting from the Project would be consistent with the population, housing, and employment projections set forth in SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which form the basis of the AQMP's growth assumptions. Accordingly, the Project would not conflict with or obstruct implementation of the AQMP, and associated impacts would be less than significant.

(ii) City of Los Angeles Policies

The Project would promote the General Plan Air Quality Element's goals, objectives and policies, as discussed in Section IV.F, Land Use, of this Draft EIR. In particular, the Project includes 286 bicycle parking spaces (including 218 long-term spaces and 68 short-term spaces for the proposed residential, commercial/retail, and office uses). In addition to bicycle parking, the Project would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. Moreover, the Project would be consistent with the existing land use pattern in the vicinity, which concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. As discussed in detail in Section IV.B, Air Quality, of this Draft EIR, the Project would implement numerous sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Based on the above, the Project would be consistent with applicable policies of the Air Quality Element.

(b) Air Emissions and Air Quality Standards

(i) Construction

As presented in Table IV.B-3 in Section IV.B, Air Quality of this Draft EIR, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation would not exceed the SCAQMD daily significance thresholds for volatile organic compounds (VOCs), NO_X, carbon monoxide (CO), sulfur

oxides (SO_X), PM_{10}, or $PM_{2.5}$. Therefore, regional construction emissions associate with the Project would result in a less-than-significant impact.

As presented in Table IV.B-5 in Section IV.B, Air Quality, of this Draft EIR, maximum construction emissions would not exceed the SCAQMD-recommended localized screening thresholds (LSTs). As a result, Project-related construction activities would not expose sensitive receptors to substantial criteria pollutant concentrations, and construction of the Project would result in a less-than-significant impact with regard to localized emissions.

(ii) Operation

As presented in Table IV.B-4 in Section IV.B, Air Quality, of this Draft EIR, emissions resulting from operation of the Project at its projected buildout year of 2025 are not expected to exceed the SCAQMD's daily regional operational thresholds. Regional operational impacts would be less than significant.

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.B-6 in Section IV.B, Air Quality, of this Draft EIR. As demonstrated therein, on-site operational emissions would not exceed any of the LSTs. As such, Project operations would not expose sensitive receptors to substantial criteria pollutant concentrations and thus would result in a less-than-significant impact with regard to localized emissions.

(c) Toxic Air Contaminants

(i) Construction

According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of toxic air contaminants (TACs) over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately three years, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is would be such a short-term exposure period, construction of the Project would not expose sensitive receptors to substantial TAC pollutant concentrations, and construction TAC emissions would result in a less-than-significant impact.

(ii) Operation

As the Project would not contain substantial TAC sources and would be consistent with the California Air Resources Board (CARB) and SCAQMD guidelines, the Project would not expose off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant. Further, the Project would not release substantial amounts of TACs that would expose sensitive receptors to substantial pollutant concentrations, thus impacts on human health would be less than significant.

(d) CO "Hot Spots" Analysis

Consistent with the CO methodology discussed in Section IV.B, Air Quality of this Draft EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At Project buildout, the highest average daily trips at an intersection would be approximately 80,000 at the Figueroa/3rd Street and State Route 110 (SR-110) Ramps intersection, which is substantially below the daily traffic volumes that would be expected to generate CO exceedances, as evaluated in the 2003 AQMP.[15,16] This daily trip estimate is based on the peak hour conditions at the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Figueroa/3rd Street and SR-110 Ramps intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.[17] Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, the Project would not expose sensitive receptors to substantial pollutant concentrations related to localized mobile-source CO emissions, and impacts would be less than significant.

(e) Odors

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study provided in Appendix A of this Draft EIR, no objectionable odors are anticipated as a result

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[15] *Linscott, Law and Greenspan, Traffic Impact Study—222 West 2nd Street Project, December 2018.*

[16] *The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

[17] *It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.*

of either construction or operation of the Project. Thus, no impacts from objectionable odors would occur.

(f) Contribution to Cumulative Emissions

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown in Tables IV.B-3 through IV.B-6 in Section IV.B, Air Quality, of this Draft EIR, Project construction and operational daily emissions at the Project Site would not exceed any of the SCAQMD's regional thresholds, respectively. Therefore, the Project's contribution to cumulative regional emissions would not be cumulatively considerable and, therefore, would be less than significant. Similarly, construction and operation of the Project would have less-than-significant impacts with regard to localized emissions as well. Therefore, the Project's contribution to localized cumulative air quality impacts also would not be cumulatively considerable and, thus, would be less than significant.

(3) Cultural Resources

(a) Historic Resources

(i) Direct Impacts

The Project Site is located near but outside of the Broadway Theater and Commercial District (Historic District). There are no historic resources on the Project Site, and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project. Thus, the Project would not cause any change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 and, as such, would have no direct impacts on historic resources.

(ii) Indirect Impacts

The Project would have a less-than-significant impact on the historic resources located near the Project Site, which include the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, the Douglas Building, the Irvine-Byrne Building, and the Victor Clothing Company. Although the Project would introduce a new visual element to the area, the proposed building would be physically separated from the Douglas Building and Victor Clothing Company by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by West 2nd Street, South Spring Street, and South Broadway. Although the proposed building would be located directly across the street from the Mirror Building and north of the Douglas Building and Victor Clothing Company, the Project would not result in a substantial adverse change to the immediate

surroundings of these historic resources to the degree that their integrity or significance as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing Company are the two northernmost contributors in the Historic District, the Project would have a less-than-significant impact on the Historic District for the same reason that it has a less-than-significant impact on the two contributors. The historic buildings that are individually significant, as well as the Historic District, would continue to be eligible for listing as historic resources as defined by CEQA. Therefore, the Project would not cause any change in the significance of a historical resource as defined in Section 15064.5 and, as such, would not result in indirect impacts to historic resources in the Project vicinity.

(b) Archaeological Resources

There are no identified archaeological sites within the Project Site, although 18 archaeological sites are located within a 0.5-mile radius.

Project excavation would predominantly occur within the northeastern portion of the Project Site, outside of the areas already excavated by Metro. The depth of excavation for Project development would range between approximately 20 to 25 feet below the existing ground surface. Accordingly, Project excavation activities would be largely limited to the disturbance of artificial fill and would be unlikely to encounter sensitive subsurface materials (i.e., native, undisturbed soils with a potential to contain resources). Monitoring conducted during Metro's excavation activities within the Project Site have failed to identify prehistoric resources or any remnants of the Zanja Madre network (i.e., the Spanish and Mexican era water conveyance system in Los Angeles). The unconfirmed zanja closest to the Project Site has been identified as Zanja No. 8, which was built by Orzo W. Childs in 1857 and thus is unlikely to be associated with any Native American groups during prehistoric or protohistoric times. Furthermore, a review of historical maps does not show the zanja mapped anywhere within the Project Site. Based on the reviewed information, it was concluded that the Project would have no impact to the zanja system or other archaeological resources.

Nonetheless, if an archaeological resource were inadvertently discovered during construction of the Project, work in the area would cease, and deposits would be treated in accordance with applicable regulatory requirements, including those set forth in PRC Section 21083.2 and CEQA Guidelines Section 15064.5(c) with respect to unique archaeological resources. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98. Compliance with all required regulatory measures would ensure the Project

would not disturb, damage, or degrade an archaeological resource or its setting that is found to be important in accordance with CEQA criteria.

Therefore, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.

(4) Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, a plan consistency analysis was conducted and demonstrates that the Project would comply with or exceed the plans, policies, regulations, and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan*, SCAG's 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. Consistency with these plans would reduce the Project's incremental contribution of GHG emissions. The Project would also implement specific Project design features to further support and promote environmental sustainability. Because the Project would be consistent and would not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

In addition, Section IV.D, Greenhouse Gas Emissions, quantifies the Project's incremental contribution to GHG emissions. When taking into consideration implementation of the Project design features as well as compliance with the requirements set forth in the City of Los Angeles Green Building Code and full implementation of current state mandates, the GHG emissions for the Project in 2025 (i.e., Project buildout) would equal 153 metric tons CO_2e ($MTCO_2e$) per year (amortized over 30 years) during construction and 4,657 $MTCO_2e$ per year during operation, for a combined total of 4,810 $MTCO_2e$ per year.

Section IV.D, Greenhouse Gas Emissions, also includes a long-term analysis of GHG emissions in light of the State's existing and proposed regulatory framework relative to specified GHG reduction targets for 2030 and 2050. While it was determined that an evaluation of post-2030 Project emissions would be speculative, the Project's consistency with SCAG's RTP/SCS demonstrates that the Project will be consistent with post-2020 GHG reduction goals. Moreover, by furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets beyond 2020.

(5) Hazards and Hazardous Materials

(a) Routine Transport, Use, or Disposal of Hazardous Materials

(i) Construction

During demolition, excavation, grading, and building construction, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. All potentially hazardous materials would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Additionally, all construction activities would occur in accordance with regulatory requirements, including specific Occupational Safety and Health Administration (OSHA) requirements regarding worker safety and use of hazardous materials. Similarly, ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with applicable federal, state, and local regulations and requirements, including, but not limited to federal Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Law, federal and California OSHA (Cal/OSHA), SCAQMD rules, and permits and associated conditions issued by the City of Los Angeles Department of Building and Safety. With compliance with relevant regulations and requirements, construction activities associated with the Project would not expose the public to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction. As such, impacts would be less than significant, and no mitigation measures are required.

(ii) Operation

Operation of the Project would use limited quantities of potentially hazardous materials typical of those used in commercial, office, and residential uses, including cleaning agents, paints, pesticides, and other materials used for landscaping. Since the Project does not propose any industrial uses, these materials present a low risk for hazards exposure. Additionally, as with Project construction, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state, and local requirements. As with any business in California, tenants and vendors are subject to all applicable OSHA training and informational requirements regarding hazardous materials. Therefore, with implementation of appropriate hazardous materials management protocols during Project operation and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, as well as

adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operation of the Project. As such, impacts would be less than significant, and no mitigation measures are required.

(b) Accidental Release

(i) Construction

Polychlorinated Biphenyls (PCBs)

During Project Site reconnaissance, one pad-mounted transformer was identified at the northeastern side of the parking structure. The transformer appeared to be in good condition with no evidence of leaks or spills. Therefore, the transformer is unlikely to represent an environmental concern. In the event that PCBs are found during construction, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, and, thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of PCBs into the environment. Therefore, impacts related to the removal of PCBs during construction would be less than significant, and no mitigation measures are required.

Asbestos-Containing Materials (ACMs)

Based on the age of the parking structure, ACMs are unlikely to be present on-site. Nevertheless, if ACMs are found during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs into the environment. Therefore, impacts related to the removal of ACMs during construction would be less than significant, and no mitigation measures are required.

Lead-Based Paint (LBP)

Based on the age of the parking structure, LBP is unlikely to be present on-site. However, lead could exist in low amounts in the existing fill material during excavation, as the Project Site has been extensively developed and redeveloped since at least 1888 and multiple past buildings have been demolished. In the event that LBP is found during construction, suspect materials would be removed in accordance with regulatory requirements and regulations for the proper removal and disposal of LBP prior to demolition activities. With compliance with relevant regulations and requirements, the

Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of LBP into the environment. Therefore, impacts related to the removal of LBP during construction would be less than significant, and no mitigation measures are required.

Methane Gas

The Project Site is not located within a City-designated Methane Zone or Methane Buffer Zone. As such, the Project would not require any site-specific methane soil gas testing. The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of methane gas into the environment. Therefore, impacts with respect to methane gas during construction would be less than significant, and no mitigation measures are required.

Off-Site Contamination

Although it is not expected that off-site soil contamination could impact the Project Site, should off-site properties in the surrounding area to the northwest (i.e., upgradient of the Project Site) included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 have contaminated groundwater, there is a potential for groundwater contamination beneath the Project Site due to migration. Construction of the Project's basement and building footings may have the potential to encounter perched water should it exist within the excavation area. If construction dewatering is required, or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/perched groundwater.

In the event shallow/perched groundwater is encountered during construction, it would be sampled for laboratory analysis. Based on the test results and other technical and economic feasibility considerations, the shallow/perched groundwater would either be disposed of into the storm drain system in compliance with applicable permit requirements or, if determined to be the only viable disposal alternative because of contamination above regulatory thresholds, the sanitary sewer system. The discharge of groundwater to storm drains from dewatering operations is regulated under the California Regional Water Quality Control Board—Los Angeles Region's (LARWQCB) adopted National Pollutant Discharge Elimination System (NPDES) Order No. R4-2013-0095 (General NPDES Permit No. CAG994004, *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties;* referred to as the General NPDES Permit). If the analytical test results of the groundwater show that any toxic substance exceeds applicable water quality screening criteria, permit enrollment and treatment of the groundwater would be required prior to discharge. Alternatively, when discharge to the storm drain system is infeasible, construction groundwater may be discharged into the sanitary sewer system

through an industrial waste sewer discharge permit obtained from the City Department of Public Works, Bureau of Sanitation, Industrial Waste Management Division under LAMC Section 64.30 (Los Angeles Industrial Waste Control Ordinance). With adherence to applicable groundwater discharge requirements, including relevant permit requirements, impacts associated with a neighboring site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

(ii) Operation

Underground and Aboveground Storage Tanks

The Project does not include the installation of underground storage tanks (USTs) but may include the installation of aboveground storage tank(s) (ASTs) for use with an emergency generator(s). As such, operation of the Project could expose the public to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard associated with ASTs. However, in accordance with Los Angeles Fire Department (LAFD) requirements, any AST containing more than 60 gallons of combustible materials would have a form of secondary containment and comply with applicable design standards. Any AST containing 10,000 gallons or more of specified petroleum products would be subject to state requirements, including preparation of a Spill Prevention Control and Countermeasure Plan and biennial filing of a storage statement with the State Water Resources Control Board (SWRCB). With adherence to applicable regulatory requirements, potential impacts associated with the installation and operation of any new ASTs would be reduced to a less-than-significant level.

Due to the previous USTs located on and near the Project Site, there is a possibility of vapor intrusion within the basement level of the Project. However, based on expert studies undertaken at leaking UST sites to assess potential inhalation exposure and risk to human health associated with the migration of petroleum hydrocarbon vapors from the subsurface to indoor air, the potential for vapor intrusion is not expected to be an issue on the Project Site.

Thus, the Project would not 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 associated with operation of a UST or AST. Impacts associated with USTs and ASTs during operation of the Project would be less than significant, and no mitigation measures are required.

Polychlorinated Biphenyls

In accordance with existing regulations, which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Accordingly, during operation of the Project, maintenance of such electrical systems would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of PCBs into the environment. Therefore, no impacts related to PCBs during operation of the Project would occur, and no mitigation measures are required.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that do not contain asbestos or ACMs. Accordingly, Project operation is not anticipated to make use of or expose people to friable asbestos or ACMs on the Project Site. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of asbestos or ACMS into the environment. Thus, no impacts associated with asbestos or ACMs during operation of the Project would occur, and no mitigation measures are required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials, including paints that do not contain lead. Accordingly, Project operation is not anticipated to make use of or expose people to LBP on the Project Site. Operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of LBP. Impacts associated with LBP during operation of the Project would not occur, and no mitigation measures are required.

Methane Gas

As discussed above, the Project Site is not located within a City-designated Methane Zone or Methane Buffer Zone. As such, the Project would not require any site-specific methane soil gas testing. The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of methane gas into the environment. Therefore, impacts with respect to methane gas during operation would be less than significant, and no mitigation measures are required.

(c) Hazardous Materials Near Schools

There are no school sites located within a 0.25-mile radius of the Project Site. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would have a less-than-significant impact with respect to hazardous materials near schools.

(d) Hazardous Materials Sites

A review of online databases found no open or closed cleanup sites on the Project Site. Although the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, several nearby off-site locations are listed as hazardous materials sites pursuant to Government Code Section 65962.5 (such as historic Cortese and leaking underground storage tank [LUST] lists). Accordingly, the Project would not create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions associated with hazardous materials sites compiled pursuant to Government Code Section 65962.5. Impacts would be less than significant, and no mitigation measures are required.

(e) Airport and Airstrip Hazards

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and in the Initial Study included as Appendix A of this Draft EIR, the Project Site is not located within 2 miles of an airport or airstrip, or within an airport planning area. The nearest airport is the Los Angeles International Airport (LAX) located approximately 10.5 miles southwest of the Project Site and the nearest private airstrip is the Los Alamitos Army Airfield located approximately 21 miles southeast of the Project Site. As such, the Project would not result in a safety hazard for people residing or working in the Project area. Therefore, no impacts would occur.

(f) Emergency Evacuation Plans

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and in the Initial Study included as Appendix A of this Draft EIR, Project construction would be conducted in accordance with standard construction management plans that would ensure adequate circulation and emergency access. Specifically, as discussed in Section IV.J, Transportation/Traffic, of the Draft EIR, the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1 would require coordination with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses during construction. In addition, if required, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing

through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). As such, the Project would not impair implementation of, or physically interfere with, the City's emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant with respect to emergency response and evacuation plans.

(g) Wildfires

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and in the Initial Study included as Appendix A of this Draft EIR, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, and there are no wildlands located adjacent to the Project Site. Additionally, the Project's design and construction would comply with all applicable LAFD and code requirements. As such, the Project would not 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, caused in whole or in part from the Project's exacerbation of existing environmental conditions. Therefore, no impacts would occur with respect to wildfires.

(6) Land Use

As previously discussed, the Project Site is located within the Central City Community Plan area, with a land use designation of Regional Center Commercial, and within the designated Downtown Center. The site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Height District 4 with a D limitation allows a floor area ratio (FAR) of 6.0:1. The site is also subject to [Q] conditions, as discussed further in Section IV.F, Land Use, of this Draft EIR.

(a) Land Use Compatibility

As discussed in Section VI, Other CEQA Considerations, and the Initial Study provided in Appendix A of this Draft EIR, the Project's proposed residential, commercial, and office uses would be consistent with other land uses in the surrounding area and compatible with the surrounding community. The Project would not substantially or adversely change the existing land use relationships between the Project Site and existing off-site uses, or have a long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of these uses. Thus, the Project would not physically divide, disrupt, or isolate an established community, and impacts related to land use compatibility would be less than significant.

(b) Land Use Policy Consistency

The proposed residential, office, and commercial/retail uses are permitted by the Project Site's land use and zoning designations, and the Project's FAR of 5.83:1 would fall within the permitted FAR of 6:1 per site zoning. In addition, the Project's open space and recreational amenities totaling 27,765 square feet of usable common open space and 800 square feet of usable private open space would exceed the open space requirement of 12,675 square feet, as set forth by LAMC. As discussed in detail in Section IV.F, Land Use, of this Draft EIR, the Project would be substantially consistent with the overall intent of applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Such regulatory documents include the General Plan Framework's various chapters, General Plan Elements, Central City Community Plan, Redevelopment Plan for the City Center Redevelopment Project, applicable LAMC requirements, Broadway Theater and Entertainment District Design Guide, Broadway Streetscape Master Plan, Historic Broadway Sign Supplemental Use District, City of Los Angeles Walkability Checklist, SCAG's 2016–2040 RTP/SCS and Regional Comprehensive Plan, as well as the Downtown Design Guide and the Citywide Design Guidelines. Therefore, the Project would not be in substantial conflict with either the Community Plan, or the whole of relevant environmental policies in other applicable plans. As such, impacts related to land use consistency would be less than significant.

More specifically with respect to zoning, the Project includes a Vesting Zone Change to amend Ordinance No. 180,871 to remove [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design. With its approval, the Project would comply with all LAMC zoning requirements. The Vesting Zone Change request and other discretionary actions to implement the Project would be consistent with applicable provisions of the LAMC.

In summary, the Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to land use policy consistency would be less than significant.

(7) Noise

(a) Construction

(i) Off-Site Noise

Off-site noise sources may include construction trucks and construction worker vehicles accessing the Project Site during construction. As shown in Table IV.G-12 in Section IV.G, Noise, of this Draft EIR, Project-related construction traffic is estimated to

generate noise levels below the 5 A-weighted decibel (dBA) significance criteria along the anticipated haul route(s). As such, the Project would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Off-site construction noise impacts would be less than significant.

(ii) On-Site Vibration (Building Damage)

Vibration levels generated by the Project's on-site construction activities at the adjacent off-site buildings would be well below the significance criteria for building damage. Based on the analysis presented in Section IV.G, Noise, of this Draft EIR, Project-level and cumulative vibration impacts with respect to building damage would be less than significant.

(iii) Off-Site Vibration (Building Damage)

Vibration levels generated by construction trucks (i.e., haul, delivery, and concrete trucks) along the Project's haul route(s) would be below the significance criteria for building damage. Accordingly, Project-level and cumulative vibration impacts with respect to building damage would be less than significant.

(b) Operation

(i) On-Site Stationary Noise Sources

The Project's on-site stationary noise sources would include outdoor mechanical equipment (e.g., HVAC equipment), the loading dock and trash compactors, parking, and activities within the proposed outdoor spaces (e.g., the ground level paseo, roof level pool and decks). Estimated noise levels at the identified off-site receptor locations resulting from operation of the Project's various on-site stationary noise sources are presented in Table IV.G-13, Table IV.G-15, and Table IV.G-16 in Section IV.G, Noise, of this Draft EIR. As shown, during Project operations, the estimated noise levels at all off-site receptor locations would be well below the existing ambient noise levels and the significance criteria of 5 dBA (L_{eq}) above ambient noise levels. Therefore, the Project would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Noise impacts from on-site stationary noise sources would be less than significant.

(ii) Off-Site Mobile Noise Sources

The Project's off-site mobile noise sources would consist of roadway traffic.

Existing Plus Project

Table IV.G-17 in Section IV.G, Noise, of this Draft EIR presents the estimated increase in noise levels due to Project-related traffic compared with existing traffic noise conditions. As shown therein, the estimated noise increase due to Project-related traffic would be below the 3 dBA Community Noise Equivalent Level (CNEL) significance criteria. Therefore, the Project would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and off-site traffic noise impacts under Existing Plus Project conditions would be less than significant.

Future Plus Project

As shown in Table IV.G-18 in Section IV.G, Noise, of this Draft EIR, the Project is estimated to result in a maximum increase in traffic-related noise levels of up to 0.5 dBA CNEL along Broadway between 2nd Street and 3rd Street. This maximum increase in traffic noise levels would be well below the 3 dBA CNEL significance criteria (applicable to noise levels within the normally unacceptable land use category). Furthermore, a noise increase of less than 1 dBA is not perceptible and generally considered negligible. Therefore, the Project would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and off-site traffic noise impacts under Future Plus Project conditions would be less than significant.

(8) Population and Housing

(a) Direct Impacts

Due to the employment patterns of construction workers in Southern California and the construction labor market, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Thus, there would not be any substantial population growth and associated demand for housing in the SCAG region or the City due to Project construction. As such, construction-related impacts associated with population and housing would be less than significant.

The Project includes 107 multi-family residential units and, thus, would introduce a new residential population into the area. Using a Citywide household size factor of 2.44 persons per household for multi-family housing units, the Project would be estimated

to generate a residential population of 261 persons at full buildout.[18] Based on data from SCAG's 2016–2040 RTP/SCS, the Project population of 261 persons would represent approximately 0.02 percent of the projected growth in the SCAG region between 2016 and 2025 (i.e., the Project's baseline and buildout years), and 0.11 percent of the projected growth in the City during the same period. As such, the new residential population would fall well within the forecasts for the City and region. Therefore, Project impacts related to population growth would be less than significant.

As stated in many adopted regional and local planning documents, including the City's 2013–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. The 107 multi-family residential units included in the Project would represent approximately 0.02 percent of the projected housing growth in the SCAG region between 2016 and 2025 and 0.09 percent of the projected housing growth in the City during the same period. These new units would assist the City in meeting its fair share of the regional housing need identified by SCAG (82,002 units for the years 2013 to 2021 or an average of about 10,250 units per year). Based on this, the Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year. As such, impacts relating to housing growth would be less than significant.

(b) Indirect Impacts

In addition to 107 new dwelling units, the Project includes approximately 7,200 square feet of retail uses and approximately 534,044 square feet of offices uses. The retail and office uses would include a range of permanent full-time and part-time positions, most of which are likely be filled by persons already residing in the vicinity of Downtown or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur. This demand could be met by a combination of the Project's 107 dwelling units, existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned Downtown. Given these options, sufficient housing is expected to be available to accommodate any indirect demand for housing generated by the Project. Likewise, any indirect population growth associated with Project employment would not be substantial and would fall well within SCAG's projections

[18] *Based on 2015 Census American Community Survey 5-Year Estimate data (2011-2015), per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, March 29, 2017. Although the City has begun using a factor of 2.43 residents per multi-family housing unit based on 2016 Census American Community Survey 5-Year Estimate data, the higher 2015 rate is utilized herein as it was in use at the time the Project's NOP was published as well as to provide a conservative estimate of Project impacts.*

for population growth in the SCAG region and the City. As such, indirect population and housing impacts would be less than significant.

(9) Public Services—Police Protection

(a) Construction

With implementation of the Project design features and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the Los Angeles Police Department (LAPD) to serve the Project Site or surrounding area. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's service capability; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Further, the Project would not cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

The Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project would not substantially affect emergency response as a result of traffic congestion attributable to the Project. Therefore, the Project would not result in a need to construct new police facilities or modifications to any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.

Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new police station construction in the area impacted by this Project either

because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location of any future station, would be speculative and beyond the scope of this document.

(10) Public Services—Fire Protection

(a) Construction

Similar to Police protection, Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service. Therefore, impacts to fire protection services and emergency medical services (EMS) during Project construction would be less than significant, and no mitigation measures are required.

(b) Operation

Compliance with applicable regulatory requirements that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided to reduce the demand on LAFD facilities and equipment. As such, impacts with regard to LAFD facilities and equipment would be less than significant. In addition, Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area, and impacts with regard to response distance and emergency access would be less than significant. Furthermore, with construction of the proposed fire water system improvements (i.e., connections to the existing water mains), and a fire flow pump system in accordance with Project Design Feature FIR-PDF-1, the Project would meet fire flow requirements and related impacts would be less than significant.

As such, Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service and would not inhibit LAFD emergency response. Therefore, impacts to fire protection and EMS services during Project operation would be less than significant.

Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California

Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new fire station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts.[19] Further analysis, including a specific location of any future station, would be speculative and beyond the scope of this document.

(11) Public Services—Schools

(a) Construction

As discussed above, the construction-related employment generated by the Project would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. As such, impacts to school facilities during Project construction would be less than significant.

(b) Operation

The Project would directly generate students through the construction of 107 new residential dwelling units. As shown in Table IV.I.3-3 in Section IV.I.3 Public Services—Schools, of this Draft EIR, using applicable Los Angeles Unified School District (LAUSD) student generation rates, the Project's residential component is estimated to generate 569 students, including 309 elementary school students (Grades K–5), 84 middle school students (Grades 6–8), and 176 high school students (Grades 9–12). In addition, the Project's office and commercial/retail components could generate students should any employees relocate to the Project Site vicinity. Based on existing enrollment and capacity data from LAUSD, 9th Street Elementary School would not have adequate capacity to accommodate the new students generated by the Project under existing conditions, while

[19] *Although an EIR was prepared for the construction of LAFD Fire Station No. 39, the EIR concluded there would be no significant impacts. See Notice of Determination for Van Nuys Fire Station 39.*

Sal Castro Middle School and the Belmont Zone of Choice high schools would have excess capacity.

Pursuant to Senate Bill (SB) 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Accordingly, with adherence to existing regulations, impacts on schools would be less than significant.

(12) Public Services—Libraries

(a) Construction

The construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for library facilities in the vicinity of the Project Site. Therefore, Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. New or expanded library facilities would not be required to address the negligible effects on library services during the Project's construction phase. Consequently, there would be no physical environmental impacts involving library construction.

(b) Operation

Project operation would not create any new exceedance of the capacity of local libraries to adequately serve the existing residential population, based on target service populations or as defined by the LAPL, which would result in the need for new or altered facilities or substantially increase the demand for library services for which current and future demand exceeds the ability of the facility to adequately serve the population. Therefore, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.

In addition, Project impacts on libraries would not be cumulatively considerable, and cumulative impacts would be less than significant. Nonetheless, the LAPL recommends a per capita fee of $200 to be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a condition of Project approval.

(13) Public Services—Parks and Recreation

(a) Construction

Project construction would not generate a demand for park or recreational facilities that could not be adequately accommodated by existing or planned facilities and services. Therefore, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures would not be required.

(b) Operation

Due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site amenities to meet their recreational needs. Furthermore, the Project would meet applicable requirements regarding the provision of on-site open space, payment of the Dwelling Unit Construction Tax, and compliance with the City's Quimby Ordinance requirements, as set forth in LAMC Sections 12.21, 17.12, and 21.10.3(a)(1). While the Project would not meet the parkland provision goals set forth in the Public Recreation Plan, these are Citywide goals and are not intended to serve as requirements for individual development projects. Compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces would ensure that the intent of the Public Recreation Plan's parkland standards would be met. Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Additionally, the 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. Impacts to parks and recreational facilities would be less than significant, and no mitigation measures are required.

(14) Transportation/Traffic

(a) Consistency with Applicable Plans, Ordinances, and Policies

(i) Construction Traffic

Project construction would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The Project's construction-related traffic impacts with respect to roadway levels of service, access (including pedestrians/bicycles), and transit would be less than significant. Additionally, the Construction Traffic Management Plan prepared pursuant to Project

Design Feature TR-PDF-1 would further reduce the Project's less-than-significant construction impacts.

(ii) Public Transit

A total of 59 bus/rail lines and routes provide service adjacent to or in close proximity to the Project Site via transfers. These lines provide an average of 561 and 545 buses and trains during the weekday A.M. and P.M. peak hours, respectively. It is anticipated that existing transit services will adequately accommodate Project-generated transit trips. Nevertheless, should future demand for transit exceed available capacity levels, Metro, LADOT DASH Transit, and other transit operators could adjust the capacities on affected routes, consistent with their policies and objectives. Therefore, the Project would not conflict with an applicable plan, ordinance, or policy (related to public transit) establishing measures of effectiveness for the performance of the circulation system, and impacts to public transit would be less than significant.

(iii) Pedestrian and Bicycle Safety

The Project's access locations would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls in compliance with the City's pedestrian safety requirements. In addition, the Project would provide ample and safe bicycle parking on-site. Therefore, the Project would not conflict with an applicable plan, ordinance, or policy (related to bicycle and pedestrian safety) establishing measures of effectiveness for the performance of the circulation system. Impacts would be less than significant.

(iv) Parking

As previously indicated, the Project would require 628 vehicular parking spaces per LAMC parking requirements, based on bicycle parking and transit credit deductions, as well as 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2.[20] The existing parking garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces located outside of the parking structure). Accordingly, the Project's parking requirement would be met, and surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area. Regardless, pursuant to SB 743 and PRC

[20] *Parking requirements, including required bicycle parking and credit reductions, are based on LAMC Sections 12.21.A4 (Off-Street Automobile Parking Requirements), 12.21.A4(i) (Exception Downtown Business District), 12.21.A4(k) (Fractional Space), 12.21.A4(p) (Exception for Central City Area), 12.21.A4(x)(3) (Exception for Specified Exception Areas), and 12.21.A16(a)(2) (Bicycle Parking for Commercial Uses).*

Section 21099, the Project's parking impacts shall not be considered significant impacts on the environment as a matter of law.

(b) Congestion Management Plans

(i) Congestion Management Plan Intersections

As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would add fewer than 50 peak hour trips to the nearest Congestion Management Plan (CMP) intersections during the weekday A.M. and P.M. peak hours. Therefore, the Project would not conflict with guidelines established in the CMP, and, as such, impacts to the regional transportation system would be less than significant.

(ii) Congestion Management Plan Freeway Segments

As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would add fewer than 150 peak hour trips (in either direction) to the CMP freeway monitoring locations during the weekday A.M. and P.M. peak hours. Therefore, the Project would not conflict with guidelines established in the CMP, and, as such, impacts to the regional transportation system would be less than significant.

(iii) Congestion Management Plan Transit

The Project is forecast to generate approximately 266 transit trips during the weekday A.M. peak hour and 257 transit trips during the P.M. peak hour, which corresponds to less than one additional transit rider per bus/train on average. It is therefore anticipated that existing transit service in the area will adequately accommodate Project-generated transit trips. Accordingly, the Project would not conflict with CMP guidelines regarding transit, and impacts would be less than significant.

(c) Air Traffic

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and in the Initial Study included in Appendix A of this Draft EIR, the Project Site is not located in the vicinity of any public or private airport or planning boundary of any airport land use plan. However, due to the proposed building's height and in accordance with Code of Federal Regulations Title 14, Section 77.13, the Applicant would be required to submit copies of Federal Aviation Administration (FAA) Form 7460-1 to the FAA Obstruction Evaluation Service (OES). The OES would then evaluate the Project, and any OES recommendations would be incorporated into the building's design, including protocols pertaining to building markings and lighting. Implementation of required design features and lighting would ensure that impacts associated with air traffic safety would be less than significant. Thus,

the Project would have a less than significant impact with respect to air traffic safety, and no mitigation measures are required.

(d) Hazardous Design Features

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and the Initial Study included in Appendix A of this Draft EIR, the Project's design does not include hazardous features. The roadways adjacent to the Project Site are part of the local roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses, as the proposed uses are consistent with other commercial and residential uses in the Project vicinity. Thus, no impacts related to hazardous design features or incompatible uses would occur, and no mitigation measures are required.

(e) Emergency Access

(i) Construction

The Project could potentially impact the provision of emergency services by LAFD and LAPD in the vicinity of the Project Site as a result of construction-related traffic impacts to the surrounding roadways. As discussed above, Project construction would not result in any significant traffic impacts at the study intersections, but may involve temporary lane closure(s). The Construction Traffic Management Plan set forth in Project Design Feature TR-PDF-1 would require coordination with the City and emergency service providers to ensure adequate access to the Project Site and neighboring businesses is maintained during construction. In addition, if required, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, emergency vehicles are able to negotiate typical street conditions in urban areas, including areas near temporary travel lane closure(s). Construction activities associated with the Project are not expected to have a detrimental effect on emergency response times. Therefore, the Project would not result in inadequate emergency access, and impacts to emergency access during Project construction would be less than significant.

(ii) Operation

As previously described, vehicular access to the Project Site would be provided via one existing driveway on Broadway and two existing driveways on Spring Street (plus a new driveway on Spring Street for loading dock access). Based on *L.A. CEQA Thresholds Guide* guidance, the Project's potential impacts on operating conditions at the intersections nearest the primary site access points (i.e., Intersection Nos. 16, 17, 23, and 24) were

studied. Intersection Nos. 16, 17, 23, and 24 are projected to operate at LOS B or better during the A.M. and P.M. peak hours under Existing With Project conditions and LOS C or better during the A.M. and P.M. peak hours under Future With Project conditions.

All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project would not result in inadequate emergency access, and impacts to emergency access would be less than significant.

(f) Public Transit, Bicycle, and Pedestrian Facilities

The Project would implement a multi-modal transportation strategy that includes multiple vehicular access points for adequate and convenient access, enhanced transit and pedestrian access, and a safe internal pedestrian circulation plan with minimal vehicular conflicts. Therefore, the Project would not decrease the performance or safety of such facilities. As such, impacts to public transit, bicycle, and pedestrian facilities would be less than significant.

(15) Tribal Cultural Resources

In compliance with the requirements of AB 52, the City provided formal notification of the Project on January 6, 2017, to a number of California Native American tribes listed on the City's AB 52 contact list. The required 30-day response period for the consultation requests concluded on February 5, 2017. The City received a response from Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians—Kizh Nation, who sent two letters dated January 10 and January 26, 2017. During the consultation process, Tribal Chairman Salas provided detailed information pertaining to the Gabrieleño Band of Mission Indians—Kizh Nation's traditional use of the area, which is summarized in Section IV.K, Tribal Cultural Resources, of this Draft EIR. Of note, Tribal Chairman Salas suggested that the village of Yangna was just over 0.5 mile from the Project Site, as indicated by the presence of numerous Native American neophyte burials that were disturbed when accidently encountered by a previous project. To ensure that any unearthed cultural resources be treated appropriately, Tribal Chairman Salas has requested that a certified Gabrieleño Band of Mission Indians—Kizh Nation Native American Monitor be present during all ground-disturbing activities associated with the Project.

While Tribal Chairman Salas provided valuable information through the consultation, no known, geographically-defined resources were identified within or in the immediate vicinity of the Project Site. Additionally, no confirmed Native American resources have

been identified on-site or within a 0.5-mile search radius through the records search completed at the South Central Coastal Information Center (SCCIC) or through a Sacred Lands File records search. Furthermore, monitoring of Metro's construction site (within the Project Site) has not yielded any Native American cultural resources. This information suggests that subsurface conditions within the Project Site have little potential to support the presence of unanticipated cultural resources or tribal cultural resources.

Based upon the record, the City has determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources. On October 19, 2018, the City concluded that mutual agreement cannot be reached between the Tribe and City for purposes of AB 52 and therefore the City has no basis under CEQA to impose any related mitigation measures. The Tribe responded to the City (on the same day) and requested that if the Project results in ground disturbance that the Tribe be consulted. The City responded on November 15, 2018, and confirmed that consultation for the Project had occurred and closed. Additionally, the City responded that the Tribe may submit comments on the EIR as long as the comments are received prior to approval of the document.

To date, no response has been received from any of the other tribal contacts regarding tribal cultural resources or other concerns about the Project. Based on the lack of responses, government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a tribal cultural resource within or near the Project Site. As such, with the close of tribal consultation by the City on October 19, 2018, the City has fulfilled the requirements of AB 52. The City's written correspondence related to the AB 52 consultation is included in Appendix C of the Tribal Cultural Resources Report (Appendix M of this Draft EIR).

Based on the negative results, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Impacts to tribal cultural resources would be less than significant, and no mitigation measures are required.

While no tribal cultural resources are anticipated to be affected by the Project, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. For purposes of this analysis, it is assumed the City would impose this condition on the Project as part of its land use approvals. Should tribal cultural resources be inadvertently encountered during Project construction, this condition of approval requires the temporarily halting of construction activities near the encounter and notification of the City and any Native American tribes traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable

period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then be required to implement the tribe's recommendations if a qualified archaeologist concludes that the tribe's recommendations are reasonable and feasible. The recommendations would be incorporated into a tribal cultural resources monitoring plan, and once the plan is approved by the City, ground disturbance activities would be permitted to resume. In accordance with this condition of approval, all related activities would be conducted in accordance with regulatory requirements. Although the Project would result in less-than-significant impacts to tribal cultural resources, should the City impose its established condition of approval on the Project to address any inadvertent discovery of a tribal cultural resource, the less-than-significant impacts to tribal cultural resources would be further reduced.

(16) Utilities and Service Systems—Water Supply and Infrastructure

(a) Water Infrastructure

(i) Construction

The Project would require water connections to either the existing 12-inch main line in Spring Street or the 16-inch main line in Broadway. Construction impacts associated with the connections and installation of on-site water distribution lines would primarily involve trenching to place the lines below surface. The design and installation of new service connections would meet applicable City standards, and Project contractors would coordinate with the Los Angeles Department of Water and Power (LADWP) to identify appropriate specifications and avoid disruption of water service. As discussed further below, no new public or private fire hydrants would be necessary.

The limited off-site connection activities could temporarily affect access in adjacent rights-of-way. However, as previously discussed, a construction management plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available. In addition, the Project's construction activities would involve a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil removal and compaction, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term, related activities. The existing water distribution capacity would be adequate to serve the Project's construction-related water demand, which would be limited and temporary.

Overall, construction activities associated with the Project would not require or result in the construction of new water facilities or expansion of existing facilities that could have a

significant impact on the environment. As such, construction-related impacts affecting water infrastructure would be less than significant.

(ii) Operation

The Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. The Project falls within the Industrial and Commercial development category, which has a required minimum fire flow of 6,000 to 9,000 gallons per minute (gpm) from four to six adjacent fire hydrants flowing simultaneously, with a minimum residual pressure of 20 pounds per square inch (psi) at full flow. As discussed in the Utilities Report included in Appendix N.2 of this Draft EIR, Service Advisory Requests were provided by LADWP to determine water pressure and flow capacity for the existing lines in the Project area. This data shows water pressure in the adjacent lines ranges between 39 and 56 psi, depending on the street. As this pressure is generally considered low for a development of the Project's size, it was determined that a pump would be needed to provide adequate fire flow pressures inside the building. As set forth in Project Design Feature FIR-PDF-1, detailed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, the Project would include the installation of a fire flow pump system in order to provide adequate water pressure for fire-fighting purposes within the proposed building. Furthermore, the building would incorporate supplemental fire safety features, including an automatic fire sprinkler system, in compliance with LAFD recommendations and based on approval by the Fire Marshal. The installation of the fire flow pump system, as well as the automatic fire sprinkler system, would be subject to LAFD review and approval during LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for the Project, as set forth in LAMC Section 57.118.

There are four public fire hydrants near the Project Site (southeast corner of 2nd Street and Broadway; southeast corner of 2nd Street and Spring Street; west side of Spring Street just south of the Project Site; and west side of Broadway just south of the Project Site), which LAFD has determined are adequate for the Project, based on the Industrial and Commercial land use category requirements. Thus, no additional public or private fire hydrants would be necessary for the Project.

Based on the above, the Project would not exceed the available capacity of the water distribution infrastructure serving the Project Site. Accordingly, the Project would not require or result in the construction of new water facilities or expansion of existing facilities that could cause significant environmental effects. Therefore, the Project's operational impacts on water infrastructure would be less than significant.

(b) Water Supply

(i) Construction

As noted above, the Project's construction activities would involve a temporary demand for water. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed but in any case would be minor (i.e., substantially less than operational water usage), as well as short-term and intermittent in nature. As discussed in the Utilities Report included in Appendix N.2 of this Draft EIR, water use during construction would be well within the availability of LADWP's water supply. Furthermore, as concluded in LADWP's 2015 UWMP, the projected water demand throughout the entire City would be met by available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040, during which time Project construction would occur (2022–2025). Therefore, the Project's water demand could be met by the City's available supplies during each year of Project construction. As such, the Project would have sufficient water supplies available, and construction-related impacts to water supply would be less than significant.

(ii) Operation

Development of the Project would generate long-term water demand related to human consumption, operational uses, maintenance, irrigation, and other activities on the Project Site. The Project would incorporate sustainability features such as efficient plumbing fixtures and appliances, water-efficient/drought-tolerant landscaping, state-of-the-art irrigation, and appropriate leak detection that would reduce the Project's water demand, as detailed in Project Design Feature WAT-PDF-1. Assuming consistent water use throughout the year and when accounting for water savings due to both required and additional proposed water conservation measures, the Project is estimated to result in a water demand of 129,784 gallons per day (gpd) (145.39 acre-feet per year [AFY]).

The 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040. Furthermore, as outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City through a variety of means including demand reduction (i.e., conservation), recycling, and alternative sources of water supplies. In addition, as previously discussed, the Project's population, housing, and employment would fall within SCAG's growth projections for the City of Los Angeles, which form the basis for the 2015 UWMP water demand forecasts.

Therefore, the Project's estimated water demand would not exceed the available supplies projected by LADWP for normal, single-dry, and multiple-dry years through the year 2040. In addition, the Project's water demand would fall within the 2015 UWMP's

projected increase in Citywide water demands and potential multi-dry year water supply conditions. Thus, LADWP would be able to meet the Project's water demand, as well as the existing and planned future water demands within its service area. Therefore, the Project's operational impacts on water supply would be less than significant.

(17) Utilities and Service Systems—Wastewater

(a) Wastewater Treatment

(i) Construction

During construction, temporary restroom facilities would be provided on-site, and associated wastewater would be hauled off-site rather than discharged into the public sewer system. As such, wastewater generation related to Project construction activities would not cause a measurable increase in wastewater flows.

With respect to construction dewatering, the Project's excavation activities are not expected to impact groundwater. However, if construction dewatering is required or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/perched groundwater. While the discharge of groundwater to the local storm drain system is the preferred option for dewatering operations, when other disposal methods are determined to be infeasible, construction groundwater may be discharged into the sanitary sewer system through an industrial waste sewer discharge permit obtained from the City Department of Public Works, Bureau of Sanitation, Industrial Waste Management Division under LAMC Section 64.30. Compliance with an industrial waste sewer discharge permit, if required, would minimize impacts associated with any potential construction dewatering activities.

Thus, wastewater generation associated with Project construction activities would not cause a measurable increase in wastewater flows or exceed wastewater treatment requirements of the LARWQCB. Therefore, impacts to the wastewater system and treatment requirements as a result of Project construction activities would be less than significant.

(ii) Operation

As detailed in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project is conservatively estimated to generate an average daily wastewater flow of 108,749 gpd. However, actual generation would be at least 20 percent lower based on compliance with indoor water reduction requirements set forth in the Green Building Code (LAMC Section 99.05.303.2). Project wastewater flows would be treated at Hyperion Water Reclamation Plant, which has sufficient available capacity and operates in

accordance with NPDES permits and LARWQCB requirements. More specifically, the Project's average daily wastewater flow would represent approximately 0.06 percent of the Hyperion Treatment Plant's current remaining available capacity of 175 million gallons per day (mgd) and approximately 0.02 percent of its current design capacity of 450 mgd (which is conservatively assumed not to increase before the Project buildout year of 2025). As such, Project operation would not result in an exceedance of applicable wastewater treatment requirements and would not require or result in the construction or expansion of wastewater treatment facilities. Therefore, operational impacts with respect to wastewater treatment would be less than significant, and mitigation measures are not required.

(b) Wastewater Infrastructure

(i) Construction

Construction impacts associated with the installation of on-site wastewater infrastructure and off-site sewer lateral connections to the adjacent public mains would be temporary in nature and generally limited to trenching. However, as set forth in TR-PDF-1, a Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. In addition, activities related to the installation of any required wastewater infrastructure would be coordinated through the City of Los Angeles Bureau of Sanitation (LASAN) so as not to interrupt existing service to other users. As such, Project construction impacts to the wastewater conveyance system would be less than significant.

(ii) Operation

As described in the Utilities Report, there is an 8-inch public main line in 2nd Street, an 18-inch main line in Spring Street, and two separate 12-inch main lines in Broadway, with four existing connections to the Project Site. Based on the current approximate flow levels and design capacities in the public sewer system and the Project's estimated wastewater flow of 108,749 gpd, the City determined the Project would require multiple 8-inch sewer laterals to connect to the main lines in the adjacent streets. With the connection of the laterals, the existing capacity would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. Thus, the Project would not cause a measurable increase in wastewater flows that would constrain any sewer's capacity. Accordingly, Project operation would not require or result in the construction or expansion of wastewater facilities in a manner that would cause significant environmental effects. Operational impacts with respect to wastewater infrastructure capacity would be less than significant, and mitigation measures are not required.

(18) Utilities and Service Systems—Solid Waste

(a) Landfill Capacity

(i) Construction

Based on construction and debris rates established by the USEPA, Project construction activities are estimated to generate a total of approximately 4,454 tons of construction-related waste, not including soil export. In accordance with SW-PDF-3, a construction waste management plan would be implemented to achieve a minimum 75-percent diversion from landfills. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), all remaining construction and demolition waste generated by the Project would be delivered to a Certified Construction and Demolition Waste Processing Facility. Assuming a 75 percent diversion rate, the Project would require the disposal of approximately 1,113 tons of construction-related waste in the County's inert landfill throughout the construction period. This amount would represent approximately 0.002 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 57.56 million tons. Since the County's permitted inert landfill does not face capacity shortages, the Project would be served by landfills with sufficient permitted capacity to accommodate its solid waste disposal needs, and construction impacts to solid waste facilities would be less than significant.

(ii) Operation

Project operations would generate an estimated 1,109 tons of solid waste annually. Assuming a diversion rate of 75 percent in accordance with SW-PDF-4, the increase in solid waste disposal associated with the Project would be approximately 277 tons per year, which would represent an approximate 0.01 percent increase in the City's annual solid waste disposal quantity based on the disposal of approximately 2.88 million tons in 2016.[21] Project-generated solid waste would be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The estimated remaining capacity for County Class III landfills open to the City of Los Angeles is approximately 85.44 million tons as of December 31, 2016.[22,23] Thus, the Project's net

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[21] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

[22] *Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente) and the Calabasas Landfill, as its wasteshed does not include the Project Site. Total also excludes the additional expansion that may be provided by the Chiquita Canyon Landfill Expansion, as this expansion is not currently operational.*

[23] *From the County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. Estimated remaining Permitted Capacity*

(Footnote continued on next page)

disposal of 277 tons of solid waste annually would represent approximately 0.0003 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles. Therefore, the Project would be served by a landfill with sufficient permitted capacity to accommodate the operational solid waste disposal needs. Potential impacts associated with solid waste disposal would be less than significant.

(b) Compliance with Statutes and Regulations

(i) Construction

Per SW-PDF-1, the Project would provide recycling containers on-site during construction, in accordance with City Ordinance No. 171,687. Additionally, all construction and demolition waste generated by the Project would be delivered to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement SW-PDF-2 and SW-PDF-3 to reduce construction-related solid waste generation through the use of recycled building materials and the recycling of 75 percent of construction and demolition debris (thus exceeding state requirements). Thus, the Project would promote source reduction and recycling, consistent with the California Integrated Waste Management Act of 1989 (AB 939) and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn. Therefore, Project construction would not conflict with any applicable City or state solid waste policies or objectives.

(ii) Operation

As indicated above, per SW-PDF-1, recycling containers and associated storage areas would be provided on-site in accordance with City Ordinance No. 171,687. Additionally, the Project would comply with the City's Green Building Ordinance, as applicable. Furthermore, the Project would comply with the recycLA franchise system, which is now operational. Finally, with implementation of a solid waste diversion program in accordance with SW-PDF-4, the Project would achieve at least a 75 percent waste diversion rate, consistent with California's 75-Percent "Recycling" Goal (AB 341) for 2020, as well as the City's Green LA Plan. Therefore, the Project would not conflict with solid waste policies and objectives in the City's Source Reduction and Recycling Element or its updates, the City's Solid Waste Management Policy Plan, General Plan Framework

based on landfill owner/operator responses in a written survey by Los Angeles County Department of Public Works in May 2017 as well as a review of the site specific permit criteria established by local land use agencies, Local Enforcement Agencies, CalRecycle, California Regional Water Quality Control Board, and the South Coast Air Quality Management District.

Element, or Curbside Recycling Program, or the County Integrated Waste Management Plan. As such, potential impacts with regard to consistency with solid waste regulations and policies would be less than significant.

(19) Energy Conservation and Infrastructure

(a) Wasteful, Inefficient, or Unnecessary Use of Energy

The Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Project construction is estimated to require 11 megawatt-hours (MWh) of electricity, 165,125 gallons of gasoline, and approximately 170,090 gallons of diesel fuel; no demand for natural gas would be generated during construction. Project operation would generate an annual demand for 8,094 MWh of electricity, 5,690,050 cubic feet (cf) of natural gas, 241,016 gallons of gasoline, and 44,477 gallons of diesel fuel. As detailed in Section IV.M, Energy Conservation, of this Draft EIR, the Project's energy requirements would not significantly affect local or regional supplies or capacity, and energy usage during base and peak periods would be consistent with future energy projections for the region. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond such requirements. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with relevant energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

(b) Energy Demand Relative to Available Supply and Distribution Infrastructure

As demonstrated in Section IV.M, Energy Conservation, of this Draft EIR, Project construction and operation would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. In particular, LADWP and the Southern California Gas Company have confirmed the Project's electricity and natural gas demands can be met. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

b. Less Than Significant with Mitigation

(1) Cultural Resources

(a) Paleontological Resources

The records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. However, localities were identified nearby from the same sedimentary deposits that occur subsurface in the Project area. Given the location of these finds and past disturbance on the Project Site, grading or very shallow excavations in the uppermost layers of soil and Quaternary deposits are unlikely to discover significant vertebrate fossils, but deeper excavations have the potential to encounter significant remains of fossil vertebrates. While the Project is not anticipated to result in the permanent loss of, or loss of access to, a paleontological resource, including those of regional or statewide significance, if a paleontological resource were inadvertently discovered during construction, mitigation would be implemented to ensure a qualified paleontologist is retained to perform periodic inspections of excavation and grading activities on-site.[24] In the event paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Therefore, implementation of Mitigation Measure CUL-MM-1 would ensure that the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and, as such, any potential impacts related to paleontological resources would be less than significant.

(2) Hazards and Hazardous Materials

(a) Accidental Release—Underground and Aboveground Storage Tanks

While several former on-site USTs have been removed and received closure status, construction activities could disturb previously unknown or unidentified USTs (such as any associated with the former gas station located at the northeastern corner of the Project Site) or residual soil and/or groundwater that was determined to be within historical cleanup

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[24] *According to the Society of Vertebrate Paleontology, a qualified paleontologist generally shall have the following qualifications or equivalent: a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals; demonstrated competence in the field and regional experience; at least two full years professional experience; proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; experience collecting vertebrate fossils in the field. Source: Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx, accessed April 3, 2018.*

standards but may now exceed current cleanup standards. If USTs or contaminated soils are encountered during construction, the Project would comply with existing regulatory requirements pertaining to their removal. Soil sampling would be conducted during the UST removal process, and the results of those sampling activities may initiate a site assessment process if warranted. In addition, any unexpectedly encountered contamination would be excavated, treated, or disposed of to the satisfaction of the applicable regulatory agencies, including LAFD, LARWQCB, and/or the Department of Toxic Substances Control. Compliance with regulatory permitting, notification, and worker safety regulations and programs would address construction worker safety at, or near, areas with potential contamination. Adherence to these guidelines would serve to effectively avoid worker exposure to hazardous materials that may be encountered on-site during construction activities.

Nevertheless, because the potential for residual contamination exists and because previously unidentified USTs may be located on the Project Site, the Project may 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, and, as such, impacts would be potentially significant. However, these potential impacts would be reduced to a less than significant level through the implementation of Mitigation Measures MM-HAZ-1 and MM-HAZ-2.

c. Significant and Unavoidable

(1) Noise

(a) Project-Level On-Site Construction Noise

Noise impacts from Project-related construction activities occurring within or adjacent to the Project Site would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. As presented in Table IV.G-11 in Section IV.G, Noise, of this Draft EIR, estimated noise levels from construction activities would be below the significance criteria at all off-site receptors, with the exception of receptor location R6 (which represents future noise-sensitive development at Related Project No. 121, the Times Mirror Square project). The estimated construction noise levels at receptor R6 would exceed the significance criteria (i.e., 73.2 dBA L_{eq} at R6) by up to 9.9 dBA, for a noise level of up to 83.1 dBA L_{eq}. However, the noise impact identified at receptor R6 assumes the proposed mixed-use development (including multi-family residential uses) at that location will be completed and occupied prior to or during Project construction. In the event the proposed mixed-use development is not built and occupied by or during Project construction, the noise impact identified at receptor R6 would be less than significant based on the current land use (i.e., parking structure). To be

conservative, it is assumed that noise impacts associated with the Project's on-site construction activities would be significant. Implementation of Mitigation Measure NOI-MM-1 would reduce the impact at ground level to a less-than-significant level. However, this mitigation measure would not be effective in reducing construction noise at the future residences at receptor R6, which would be located on the second story and above, starting at approximately 20 feet above grade. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impact affecting the residential uses at the Times Mirror Square project.

If, however, the Times Mirror Square project is not completed and occupied prior to or during Project construction, the Project's construction-related noise impact at receptor R6 would not occur, and mitigation would not be necessary.

(b) Cumulative On-Site Construction Noise

Nine related projects are located within 1,000 feet of the Project Site and, if constructed concurrently with the Project, could combine to affect sensitive receptors located between or near two or more construction sites. Should construction of Related Project No. 121 (Times Mirror Square project) occur concurrently with Project construction, cumulative noise levels resulting from on-site construction activities could significantly affect receptor location R1 (Kawada Hotel) and receptor location R4 (Higgins Building Lofts), although such impacts would be intermittent and temporary. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through mitigation measures for each individual project, as required, and compliance with locally adopted and enforced noise ordinances. Nonetheless, cumulative construction noise impacts associated with on-site noise sources would be significant and unavoidable.

However, if Related Project No. 121 is not constructed concurrently with the Project, cumulative on-site noise impacts would be less than significant.

(c) Cumulative Off-Site Construction Noise

As detailed in Section IV.G, Noise, of this Draft EIR, it is estimated that up to 86 truck trips per hour could occur along Spring Street, 3rd Street, and 4th Street without exceeding the significance criteria of 5 dBA above ambient noise levels. In addition, it is estimated that up to 95 truck trips per hour could occur along Los Angeles Street without exceeding the significance criteria of 5 dBA above ambient noise levels. Although the Project would only generate an average of 7 truck trips per hour along each of the inbound and outbound haul routes during various construction phases, the Project is unique as it is one of two large projects in very close proximity that have the potential to be constructed concurrently and use the same street segment as part of their haul route (Los Angeles Street between 2nd

Street and US-101). Thus, truck traffic related to construction of the Project combined with the potential concurrent construction of Related Project No. 121 (the Times Mirror Square project) located immediately north of the Project Site and other related projects identified in the immediate area could result in noise levels that potentially exceed the City's significance criteria. As such, cumulative noise impacts from off-site construction activities (i.e., truck traffic) are conservatively assumed to be significant. Conventional mitigation measures, such as the construction of noise barrier walls to reduce the off-site construction noise impacts, would not be feasible as the barriers would obstruct access to other properties. As such, cumulative noise impacts from off-site construction would be significant and unavoidable. It is noted, however, that should the construction activity involving peak construction truck traffic for Related Project No. 121 be completed prior to commencement of Project construction, this cumulative construction noise impact may not occur.

(d) Project-Level On-Site Construction Vibration (Human Annoyance)

Vibration resulting from on-site construction activities would exceed the significance criteria for human annoyance at receptor location R6 (i.e., Related Project No. 121, the Times Mirror Square project, assuming it is built and occupied prior or during Project construction). Specifically, the estimated vibration level of 76 VdB (a decibel unit referenced to 1 micro-inch per second) at receptor R6 would exceed the significance criteria of 72 VdB.

Mitigation measures considered to reduce this impact included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction.[25] In addition, constructing such a wave barrier would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, given the presence of a Metro station beneath 2nd Street and the station's subsurface facilities (all currently under construction) beneath the Project Site, installation of a wave barrier below ground would not be feasible. Thus, it is concluded that there are no feasible mitigation measures to reduce the temporary vibration impacts associated with human annoyance resulting from on-site construction to a less-than-significant level. Therefore, Project-level vibration impacts (related to human annoyance) from on-site construction activities would be significant and unavoidable at receptor location R6.

[25] *Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.*

However, if Related Project No. 121 is not occupied by or before Project construction, the Project-level impact would be less than significant.

(e) Project-Level and Cumulative Off-Site Construction Vibration (Human Annoyance)

Vibration levels resulting from construction trucks would exceed the significance criteria for human annoyance at sensitive receptors along the anticipated haul route(s), including Spring Street, 3rd Street, 4th Street, and Los Angeles Street. Specifically, as discussed in Section IV.G, Noise, of this Draft EIR, temporary vibration levels could periodically reach approximately 75 VdB as trucks pass by residences. There are no feasible mitigation measures to reduce this impact. Even though vibration would be temporary, intermittent, and limited to daytime hours when haul trucks are traveling within 20 feet of a sensitive receptor, Project-level and cumulative vibration impacts with respect to human annoyance resulting from off-site construction activities (i.e., truck traffic) would be significant and unavoidable.

(2) Transportation/Traffic

(a) Project-Level Intersection Levels of Service

(i) Existing With Project Conditions

As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR and detailed in Table IV.J-7 therein, the Project is expected to result in significant impacts under Existing With Project conditions at the following three intersections during the weekday P.M. peak period: Intersection No. 5, Beaudry Avenue & 2nd Street; Intersection No. 8, Figueroa Street & 2nd Street; and Intersection No. 9, Figueroa Street & 3rd Street/SR-110 Ramps. Implementation of Project Design Feature TR-PDF-2 and Mitigation Measure TR-MM-1 would reduce the Project's significant impacts during the P.M. peak hour at two of the three impacted intersections to a less-than-significant level. However, Intersection No. 5, Beaudry Avenue & 2nd Street, would remain significantly impacted during the P.M. peak hour. While it is noted that physical improvements may be available to reduce Project impacts at this location (e.g., restriping the westbound approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane), these improvements may involve removal of the existing bicycle facility, which would likely be deemed incompatible with City's current mobility policies. As a result, Project impacts at this intersection would remain significant and unavoidable.

(ii) Future With Project Conditions

As detailed in Table IV.J-8 in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project is expected to result in significant impacts under Future With Project conditions

at the following four intersections during the indicated peak period: Intersection No. 5, Beaudry Avenue & 2nd Street (P.M.); Intersection No. 8, Figueroa Street & 2nd Street (A.M.); Intersection No. 9, Figueroa Street & 3rd Street/SR-110 Ramps (P.M.); and Intersection No. 31, Alameda Street & Arcadia Street/US-101 NB Off-Ramp (A.M.). Implementation of Project Design Feature TR-PDF-2 and Mitigation Measure TR-MM-1 would reduce the Project's significant impacts at two of the four impacted intersections to a less-than-significant level. However, Intersection No. 8, Figueroa Street & 2nd Street, would remain significantly impacted during the A.M. peak hour, and Intersection No. 5, Beaudry Avenue & 2nd Street, would remain significantly impacted during the P.M. peak hour. While it is noted that physical improvements may be available to reduce Project impacts at these locations (e.g., restriping the westbound approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane at Intersection No. 5; and restriping the eastbound approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane at Intersection No. 8), these improvements may involve the removal of existing bicycle facilities, which would likely be deemed incompatible with City's current mobility policies. As a result, Project impacts at these two intersections would remain significant and unavoidable.

11. Project Design Features

The following project design features are applicable to the Project:

a. Aesthetics

AES-PDF-1: The Project Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

AES-PDF-2: New on-site utilities that may be required to serve the Project shall be installed underground.

AES-PDF-3: Glass used in building façades shall be low-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., limit the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

b. Greenhouse Gas Emissions

GHG-PDF-1: The design of the new building shall incorporate the following sustainability features:

- Exceed Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.
- Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light-emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment.
- HVAC mechanical systems and building lighting shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Demand control ventilation shall be utilized in HVAC systems, and refrigerants in HVAC equipment shall have low GHG emission rates. In particular, the HVAC system shall be designed to optimize exterior and interior air-flow to ensure healthy indoor air quality.
- Install occupancy-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
- Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- Incorporate energy-efficient design methods and technologies such as a centralized chiller plant with rooftop ventilation, high performance window glazing, passive design and façade shading devices, high efficiency domestic water heaters, and enhanced insulation to minimize solar heat gain.
- Built-in appliances, refrigerators, and space-conditioning equipment shall meet or exceed the minimum efficiency levels mandated in the California Code of Regulations. High efficiency Energy Star-rated products and appliances shall be installed, as available.
- Fenestration shall be designed for solar orientation (i.e., window systems shall be designed to reduce thermal gain and loss), thus reducing cooling loads during warm weather and heating loads during cool weather.

- Use of water-efficient plantings with drought-tolerant species.
- Conduct a performance check of the installed space-conditioning system prior to issuance of a Certificate of Occupancy to ensure that energy-efficiency measures incorporated into the Project operate as designed.
- Complete post-construction commissioning of building energy systems prior to issuance of a Certificate of Occupancy.
- Allocate preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.

GHG-PDF-2: Upon buildout of the Project, electric vehicle charging equipment shall be installed on two percent of code-required parking spaces, and an additional three percent of code-required parking spaces shall be capable of supporting future electric vehicle supply equipment (EVSE). In total, 5 percent of code-required parking spaces shall be capable of supporting electric vehicle charging. When the application of the specified percentage results in a fractional space, the calculation shall round up to the next whole number. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway (enclosed conduit) method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. For EV-ready wiring, only raceways and related components are required to be installed at the time of construction. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

c. Noise

NOI-PDF-1: Project construction shall prohibit the use of driven (impact) pile systems.

NOI-PDF-2: All outdoor mounted, noise-generating mechanical equipment would be screened from off-site noise-sensitive receptors.

NOI-PDF-3: Loading and trash collection areas would be screened from off-site noise-sensitive receptors.

NOI-PDF-4: Outdoor amplified sound systems (e.g., speaker and stereo systems, amplification systems, or other sound-producing devices) would be designed so as not to exceed maximum noise levels of: (i) 75 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified sound systems at the ground level paseo; (ii) 85 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet for

the Levels 8 and 15 pool/roof decks; and (iii) 95 dBA (L_{eq-1hr}) at a distance of 25 feet for any amplified sound system at the Level 27 roof deck.

NOI-PDF-5: Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators shall be used during construction. In particular, solar-powered generators shall be used for the construction trailer(s) on-site.[26]

d. Public Services—Police Protection

POL-PDF-1: During construction, the Project Applicant or its successor shall implement appropriate temporary security measures, including, but not limited to, security fencing, low-level security lighting, and locked entry. During construction activities, the Project's contractor will document the security measures being implemented.

POL-PDF-2: During operation, the Project shall include access controls in the form of private on-site security, a closed circuit security camera system, 24-hour controlled access for the office and residential floors, and security patrols of the parking structure.

POL-PDF-3: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building.

POL-PDF-4: The Project shall provide sufficient lighting in and around the existing parking garage to maximize visibility and reduce areas of concealment.

POL-PDF-5: The Project entrances to, and exits from, the building, open spaces, and pedestrian walkways shall be designed, to the extent practicable, to be open and in view of surrounding sites.

POL-PDF-6: Prior to the issuance of a building permit, the Project Applicant or its successor shall consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.

POL-PDF-7: Prior to the issuance of a certificate of occupancy, the Project Applicant or its successor shall submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access

[26] *However, for purposes of a conservative analysis, the noise modeling performed for the Project assumes the use of diesel and gas-powered generators during construction.*

routes and any additional information that might facilitate police response.

e. Public Services—Fire Protection

FIR-PDF-1: Install a fire flow pump system in the building, designed in accordance with LAMC fire flow pressure standards, such that a minimum residual water pressure of 20 psi shall remain in the water system while the required fire flows are flowing per Fire Code requirements.

f. Transportation/Traffic

TR-PDF-1: Prior to the start of construction, the Project Applicant shall prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall formalize how construction will be carried out and identify specific actions required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities for the Project and shall consider other projects under construction in the immediate vicinity of the Project Site. Accordingly, the Construction Traffic Management Plan shall include, but not be limited to, the following features, as appropriate:

- Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring properties;
- Coordinate with public transit agencies to provide advanced notifications of any temporary transit stop relocations and durations and follow all safety required procedures required by the concerned agency;
- Limit any potential roadway lane closure(s) to off-peak travel periods, to the extent feasible;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;

- To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles will utilize for the delivery of construction materials (i.e. lumber, tiles, piping, windows, etc.), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project;
- Require the Applicant to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of construction activities;
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT;
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets shall at all times yield to public traffic;
- Construction-related parking and staging of vehicles shall occur on-site to the extent possible, but may occur on nearby public parking lots, as approved by the City;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site; and
- The Construction Traffic Management Plan shall meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD) as well as City of Los Angeles requirements.

TR-PDF-2: The Project Applicant shall prepare and implement a Transportation Demand Management (TDM) Program to reduce peak hour vehicular traffic to and from the Project Site. A formal Preliminary TDM Plan shall be developed in conjunction with LADOT and shall be required prior to issuance of a building permit for the Project. This preliminary plan shall include, at a minimum, measures consistent with the City's

Trip Reduction Ordinance. A Final TDM Plan shall be required prior to issuance of any Certificate of Occupancy. A Covenant and Agreement shall be enacted to ensure the TDM plan is maintained. The TDM plan may include, but shall not be limited to, the following measures:

- On-Site Employee Transportation Coordinator—An on-site Employee Transportation Coordinator (ETC) may be designated for the Project. The ETC would manage all aspects of an enhanced TDM program and also would participate in City-sponsored workshops and information roundtables. The ETC would establish a Transportation Information Center and Transportation Fairs. The Transportation Information Center would provide on-site information at its buildings for employees and visitors about local public transit services (including bus lines, rail lines and connections, rideshare programs and shuttles), and bicycle facilities (including routes, rental and sales locations, on-site bicycle racks and showers). Walking and biking maps also would be provided for employees, visitors and residents, which would include but not be limited to information about convenient local services and restaurants within walking distance of the Project. Such transportation information may be provided through a computer terminal with access to the Internet, as well as through the office of the ETC located at the Project Site. Transportation information should be maintained at the administrative offices of the building, or by directing inquiries to the building's web site as a portal;
- TDM Website Information—Transportation information should be provided in a highly visible and accessible location on the building's web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, visitors, and residents of available alternative transportation modes to access the Project Site, other amenities in the area, and travel opportunities in the area. The website also should highlight the environmental benefits of utilization of alternative transportation modes;
- TDM Promotional Material—Provide and exhibit in public places information materials on options for alternative transportation modes and opportunities. In addition, transit fare media and day/month passes should be made available to employees and visitors during typical business hours;
- Transit Welcome Package—All new employees could be provided with a Transit Welcome Package (TWP) in addition to holding a Transportation Fair on an annual basis. The TWP at a minimum could include information regarding each employer's

arrangements for free or discounted use of the transit system, area bus/rail transit route and connections/transfers information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the Project;

- Carpool Program for Employees—Provide preferential parking within the on-site parking garage for employees who commute to work in registered carpools. An employee who drives to work with at least one other employee to the site may register as a carpool entitled to preferential parking within the meaning of this provision;
- Guaranteed Ride Home Program for Employees—Provide employees who carpool/rideshare with a reimbursed ride home in the event of a valid emergency.
- Public Transit Stop Enhancements—Work in cooperation with LADOT and other transit agencies to improve existing bus stops with enhanced shelters and transit information within the immediate vicinity of the building. Enhancements could include enhanced weather/sun protection, lighting, benches, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative. In addition, coordination with the City's Bureau of Engineering is recommended in regards to the corresponding streetscape elements/design in association with the Broadway Streetscape Master Plan project and the Downtown Los Angeles Historic Streetcar project;
- Convenient Parking/Amenities for Bicycle Riders—Consistent with LAMC requirements, provide locations at the Project Site for convenient bicycle parking for employees, residents, and visitors. Bicycle parking shall be located outside and adjacent to the building as well as within the on-site parking structure such that long-term and short-term parkers can be accommodated. Bicycle parking may include bicycle racks, locked cages, or another similar parking area. Provide shower facilities for employees who commute to work via bicycle. In addition, Metro may provide additional bicycle parking within the Metro plaza;
- Local Hiring Program—To the extent feasible, when hiring conduct outreach to residents who live within Downtown Los Angeles based on satisfaction of other requirements of the available positions;

- Flexible/Alternative Work Schedules—Encourage tenants in the building to offer flexible or alternative work schedules, as well as the opportunity to telecommute if feasible; and
- Parking Cash-Out Program—Require in all leases it executes as landlord for space within the Project that tenants offer a parking cash-out program. Parking cash-out program refers to an employer-funded program under which an employer offers in-lieu of any parking subsidy, a transit subsidy or cash allowance (for use of alternative modes such as walking and bicycling) of equal or greater value.
- City of Los Angeles Bicycle Trust Fund Contribution—The Project Applicant shall make a one-time fixed-fee contribution of $50,000 to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the general Downtown Los Angeles area of the Project.
- LADOT Mobility Hub Program—The Project Applicant shall make a one-time fixed-fee contribution to LADOT to be used in the implementation of the Mobility Hub in the general area of the Project.

g. Utilities and Service Systems—Water Supply

WAT-PDF-1: The Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements:

- High-efficiency toilets with a flush volume of 1.1 gallons of water per flush or less, including dual-flush water closets.
- No-flush or waterless urinals in all non-residential restrooms.
- Non-residential restroom faucets with a maximum flow rate of 0.35 gallon per minute and a self-closing design.
- Non-residential sensor-operated kitchen faucets (except restaurant kitchens) with a maximum flow rate of 0.5 gallon per minute.
- Residential bathroom and kitchen faucets with a maximum flow rate of 1.0 gallon per minute.
- Residential showerheads with a flow rate no greater than 1.5 gallons per minute.
- High-efficiency, Energy Star–rated residential clothes washers with a water factor of 4.0 or less for top-loading machines and/or a water factor of 3.6 or less for front-loading machines.

- High-efficiency standard and/or compact Energy Star–rated residential dishwashers that use 3.0 gallons of water or less per cycle.
- Leak detection system for any domestic water systems, swimming pool, Jacuzzi, or other comparable spa equipment installed on-site.
- Drip/microspray/subsurface irrigation where appropriate.
- Matched precipitation (flow) rates for sprinkler heads.
- Proper hydro-zoning and turf minimization.
- Landscape contouring to minimize precipitation runoff.
- Minimum irrigation system distribution uniformity of 75 percent.
- Landscape contouring/bioswales, rain gardens, cisterns, and tree pits to minimize precipitation runoff.
- Native and/or drought-tolerant plant materials—approximately 72 percent of total landscaping.

h. Utilities and Service Systems—Solid Waste

SW-PDF-1: The Project shall provide clearly marked, durable on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers during construction.

SW-PDF-2: Building materials with a minimum of 10 percent recycled-content shall be used for Project construction.

SW-PDF-3: During construction, the Project shall implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris.

SW-PDF-4: During operation, the Project shall implement a solid waste diversion program to provide for the diversion (through source reduction, reuse, recycling, composting, etc.) of 75 percent of operational waste.

i. Energy Conservation and Infrastructure

ENG-PDF-1: Natural gas-fueled fireplaces shall be limited to up to 20 percent of the proposed residential units.

12. Mitigation Measures

The following mitigation measures are applicable to the Project:

a. Included in Initial Study

(1) Biological Resources

IS-1: To the extent feasible, Project tree removal activities shall be scheduled outside the nesting season for migratory birds (typically from February 15 to August 31). However, to the extent that Project tree removal activities must occur during the nesting season, all suitable habitat shall be thoroughly surveyed by a qualified biologist for the presence of nesting birds prior to removal. If any active nests are detected, the area shall be flagged, along with a minimum 50-foot buffer (this buffer may range between 50 and 300 feet, as determined by the monitoring biologist), and shall be avoided until the nesting cycle has completed or the monitoring biologist determines that the nest has failed. The results of the survey(s) shall be reported to the City of Los Angeles (i.e., the lead agency) to document compliance with applicable state and federal laws pertaining to the protection of nesting birds.

(2) Geology and Soils

IS-2:[27] All foundations to support the proposed structure shall bear in competent unweathered Fernando Formation bedrock. In particular, the high-rise portion of the structure shall be supported by a mat foundation system, bearing in competent Fernando Formation bedrock. The podium portion of the structure that will be underlain by the subterranean level shall be supported by conventional foundations, deepened to bear in competent Fernando Formation bedrock. In addition, the podium portion of the structure that will be built at-grade shall be supported by end-bearing belled caissons, deepened to bear in competent Fernando Formation bedrock; excepting therefrom any portions of the podium structure that connect to Metro's 2nd Street/Broadway rail station facilities structure.

All foundation excavations shall be observed by a qualified geotechnical engineer to verify penetration into the recommended

[27] *This mitigation measure is incorrectly identified as Mitigation Measure IS-1 on page B-17 of the Project's Initial Study.*

bearing materials. These observation(s) shall be performed prior to the placement of reinforcement. If necessary, foundations shall be further deepened to extend into satisfactory geologic materials.

Alternatively, the proposed structure's foundations may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to, the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

IS-3:[28] Any proposed vertical excavations shall be stabilized with the aid of a temporary shoring system, which shall be designed by a qualified shoring engineer in accordance with the provisions of the applicable version of the California Building Code and City of Los Angeles Building Code, as well as relevant recommendations provided by the geotechnical engineer. During the Plan Check process, the City of Los Angeles Department of Building and Safety and the geotechnical engineer of record shall review the shoring design to verify it conforms to the applicable building codes and geotechnical recommendations.

The temporary shoring system shall consist of steel soldier piles placed in drilled holes and backfilled with concrete. Depending on the depth of the shoring walls, the soldier piles may be designed as cantilevered, laterally braced utilizing tie-back anchors, or internally braced. Lagging timber boards shall be installed between the soldier piles throughout the entire depth of the shored excavation to prevent caving or raveling of the exposed soils.

Alternatively, shoring systems may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers

[28] *This mitigation measure is incorrectly identified as Mitigation Measure IS-2 on page B-20 of the Project's Initial Study.*

to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

b. Cultural Resources

CUL-MM-1: The Project Applicant or its successor shall retain a qualified paleontologist to perform periodic inspections of excavation and grading activities at the Project Site.[29] The frequency of inspections shall be based on consultation with the qualified paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the qualified paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The qualified paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant or its successor shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the qualified paleontologist's recommendations have been implemented to the satisfaction of the qualified paleontologist.

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[29] *According to the Society of Vertebrate Paleontology, a qualified paleontologist generally shall have the following qualifications or equivalent: a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals; demonstrated competence in the field and regional experience; at least two full years professional experience; proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; experience collecting vertebrate fossils in the field. Source: Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx, accessed April 3, 2018.*

c. Hazards and Hazardous Materials

HAZ-MM-1: Preparation of a Soil Management Plan (SMP): Prior to the issuance of a grading permit, a qualified environmental professional as defined by 40 CFR 312.10 shall be retained to prepare a SMP to guide the development of the below-grade portions of the Project Site (excepting those portions of the Project Site that are owned by Metro and that were excavated as part of the Regional Connector 2nd Street/Broadway rail station and portal).[30] The SMP shall document the historical conditions known about the Project Site and be prepared and executed in compliance with all applicable regulatory requirements. The SMP shall:

- Be implemented during soil disturbing construction activities (excavation and/or grading) to address any residual soil contamination and to ensure that any contaminated soils are properly identified, excavated, and disposed of off-site or remediated on-site.
- Include practices that are consistent with the California Division of Occupational Safety and Health regulations, California Code of Regulations, Title 8, as well as Certified Unified Program Agency remediation standards that are protective of the planned use.
- Document the historical conditions known about the Project Site and be prepared and executed in compliance with all applicable regulatory requirements;
- Address any residual soil contamination and to ensure that any contaminated soils are properly identified, excavated, and disposed of off-site or remediated on-site.
- Require that a qualified environmental professional or their designated representative be present on the Project Site during grading and excavation activities to sample and screen any potential residual soil contamination should it be encountered.

The qualified environmental professional shall use visual identification (such as discolored soils) and/or a screening (organic

[30] *To be considered a qualified environmental professional, a person must hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three years of full-time relevant experience; or be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in Section 312.21 and have the equivalent of three years of full-time relevant experience; or a have Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five years of full-time relevant experience; or have the equivalent of ten years full-time experience.*

vapor) meter to identify any residual soil contamination. If potential residual soil contamination is observed based on the visual identification or the screening meter, excavation and grading within such area shall be temporarily halted and redirected around the area until the contamination is evaluated by the qualified environmental professional using appropriate sampling and analytical techniques. The nature and extent of contamination shall be determined and the appropriate handling, disposal, and/or treatment of the contaminated soil shall be implemented in accordance with all applicable regulatory requirements.

The SMP also shall provide/include, as applicable, the following:

- Protocols and procedures for properly handling contaminated soil that may be encountered and to protect human health and the environment during soil disturbing construction activities (excavation and/or grading);
- Procedures for segregation of visibly impacted soil/ characterization/off-site disposal (if encountered), health and safety training, soil stockpile management (if conducted), import fill placement (if needed), and environmental site controls for stormwater and dust during the development activities;
- Action levels and air monitoring procedures for worker and community safety.

HAZ-MM-2: If any UST is encountered, a Division 5 Permit shall be obtained from the LAFD to abandon/remove the tank(s). The contractor removing the tank(s) shall be required to have a proper and current Los Angeles City Business Tax Registration Certificate and Appropriate State of California Contractor's License. Soil sampling shall be conducted by a qualified environmental professional or their designated representative per LAFD requirements during UST removal and the results of the sampling activities along with the removal activities shall be submitted in a tank removal report to the LAFD. Based on the results of the soil sampling, the LAFD may require additional site assessment and as appropriate remediation, if impacted soils are identified during the UST removal.

d. Noise

NOI-MM-1: A 12-foot-high temporary and impermeable sound barrier shall be erected along the northern property line of the Project Site between the construction area and the proposed mixed-use development located north of the Project Site across 2nd Street (receptor R6). Pedestrian access to/from the on-site Metro station shall be provided as required by and in consultation with Metro. The

temporary sound barrier shall be designed to provide a minimum 10-dBA noise reduction at ground level. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

In the event the Times Mirror Square project is not completed and occupied prior to or during Project construction, this mitigation measure shall not be required.

f. Transportation/Traffic

TR-MM-1: To enhance the traffic signal system in the Project study area and in response to the forecast significant Project impacts, the Project Applicant shall contribute a fixed-fee financial contribution toward funding traffic signal upgrades for the following study intersections along the Figueroa Street and Alameda Street corridors:

- Intersection No. 8: Figueroa Street & 2nd Street
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps
- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp.

Based on coordination with LADOT and as indicated in LADOT's assessment letter, the funding contribution towards the above traffic signal upgrades will total approximately $105,000.00. This, and any other required financial fair-share contributions, must be guaranteed prior to issuance of the Project's building permit and completed prior to the issuance of the Project's certificate of occupancy. Also, any Project-related financial fair-share contribution payments must be deposited into the appropriate City account prior to issuance of the Certificate of Occupancy.

13. Summary of Alternatives

This Draft EIR examines six alternatives to the Project in detail, which include the No Project/No Build Alternative; Reduced Density Alternative; Office Alternative A (411,000 square feet); Office Alternative B (590,000 square feet); Residential Alternative A (with podium); and Residential Alternative B (without podium). A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives relative to those of the Project.

a. Alternative 1: No Project/No Build Alternative

Alternative 1, the No Project/No Build Alternative, assumes the Project would not proceed, and no new Project-related development would occur within the Project Site. Thus, the physical conditions of the Project Site generally would remain as they have been, with the exception of ongoing activities on-site unrelated to the Project. Currently, the northern portion of the Project Site consists of a former surface parking lot, which is in use as a staging and excavation area for construction of the Metro Regional Connector 2nd Street/Broadway rail station and portal. Pursuant to a right-of-entry agreement, Metro has had exclusive control and use of the surface parking area since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until up to September 2021. At that time, control of the surface parking lot (with the exception of the portal area), will revert back to the Project Applicant (CA-LATS South, LLC). Metro's current plans call for the restoration of a paved surface area on those areas of the northern portion of the Project Site outside of the new Metro portal and plaza area following the completion Metro's construction activities. Thus, under the No Project/No Build Alternative, operation of the Metro station and portal would commence as planned but no new construction associated with the Project would occur. Impacts associated with the Metro Regional Connector project are separate from the proposed Project and are not considered part of this Alternative.[31] In addition, the southern portion of the Project Site contains a five-story, approximately 67-foot-tall parking structure that includes rooftop parking and two subterranean levels, which would remain and continue to operate as under existing conditions.

b. Alternative 2: Reduced Density Alternative

The Reduced Density Alternative, Alternative 2, involves the Project's proposed land uses but reduces the amount of development that would occur in order to eliminate at least one of the Project's significant and unavoidable impacts. Specifically, the Reduced Density Alternative involves a 26-percent reduction from the Project, resulting in the development of a 22-story mixed-use building of up to 359 feet in height, consisting of 79 residential units (9 studios, 31 one-bedrooms, 29 two-bedrooms, and 10 three-bedroom units totaling 101,637 square feet), approximately 5,328 square feet of ground level commercial uses, and 395,193 square feet of office uses within the Project Site. Based on a total of 511,968 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 4.34:1. In addition, based on the reduced number of dwelling units, Alternative 2 would provide at a minimum 9,375 square feet of open space in accordance with LAMC requirements.

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[31] *The Metro Regional Connector project was evaluated in a Final EIS/EIR (SCH No. 2009031043), available at www.metro.net/projects/connector/connector-final-eiseir/, accessed May 22, 2018.*

All other components of Alternative 2 would be substantially comparable to the Project. The building design would be similar, with a podium extending over the on-site Metro portal, although the shifted footprints of the various building volumes would be tempered. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal to Spring Street. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 445 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 2, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

Similar to the Project, Alternative 2 would require grading and excavation to a maximum depth of 25 feet in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 2 would last approximately 36 months (compared to 39 months for the Project).

c. Alternative 3A: Office Alternative A

Alternative 3A, the Office Alternative A (411,000 square feet), involves the development of a 16-story office building of up to 269 feet in height, with a total of 411,000 square feet of floor area comprised of 401,000 square feet of office space and 10,000 square feet of ground floor retail uses. Based on a total of 420,810 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 3.56:1.

All other aspects of Alternative 3A would be substantially similar to the Project. The building design would be similar to the Project, with a podium extending over the on-site Metro portal, although the shifted footprints of the various building volumes would be tempered. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Amenities such as a fitness center and common rooms would be provided for office tenants, but the outdoor pool and residential amenity decks would not be developed. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage could include general

ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 411 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 3A, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street would provide access to the loading area for the new building.

Similar to the Project, Alternative 3A would require grading and excavation to a maximum depth of 25 feet in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 3A would last approximately 33 months (compared to 39 months for the Project).

d. Alternative 3B: Office Alternative 3B

Alternative 3B, the Office Alternative B (590,000 square feet), involves the development of a 26-story office building of up to 419 feet in height, with a total of 590,000 square feet of floor area comprised of 580,000 square feet of office space and 10,000 square feet of ground floor retail uses.[32] Based on a total of 599,810 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 5.08:1.

All other aspects of Alternative 3B would be substantially similar to the Project. The building design would be similar to the Project, with a podium extending over the on-site Metro portal, although the shifted footprints of the various building volumes would be tempered. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Amenities such as a fitness center and common rooms would be provided for office tenants, but the outdoor pool and residential amenity decks would not be developed. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage could include general

[32] *While the alternatives analysis herein already includes an Office Alternative (i.e., Alternative 3A, the Office Alternative A (411,000 square feet), described above), a second variation was defined in order to maximize the FAR on-site without triggering any new or greater significant traffic impacts than would occur under the Project. Alternative 3B, the Office Alternative B (590,000 square feet) represents this scenario.*

ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 590 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 3B, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street would provide access to the loading area for the new building.

Similar to the Project, Alternative 3B would require grading and excavation to a maximum depth of 25 feet in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 3B would last approximately 37 months (compared to 39 months for the Project).

e. Alternative 4A: Residential Alternative A (With Podium)

Alternative 4A, the Residential Alternative A (with podium), proposes a 56-story building of up to 569 feet in height, with 680 residential units comprised of 190 studio units, 257 one-bedroom units, 229 two-bedroom units, and 4 three-bedroom (penthouse) units, plus 10,000 square feet of ground floor retail uses. Alternative 4A would consist of a single tower over a podium, which would extend over the Metro portal. Based on a total of 708,306 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 6.00:1.

Based on the number and size of dwelling units, Alternative 4A would provide at least 74,025 square feet of open space in accordance with LAMC requirements. Amenity decks offering a variety of social and community spaces would be provided on various levels and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies would be provided on various levels for some of the residences. In addition, to meet the open space requirement, some recreational facilities could be developed on the roof of the existing parking garage located in the southern portion of the Project Site.

The other aspects of Alternative 4A would be substantially similar to the Project. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal

across the site to Spring Street. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage would include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 635 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 4A, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

Similar to the Project, Alternative 4A would require grading and excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 4A would last approximately 57 months (compared to 39 months for the Project).

f. Alternative 4B: Residential Alternative B (Without Podium)

Alternative 4B, the Residential Alternative B (without podium), proposes a 56-story building of up to 580 feet in height, with 680 residential units comprised of 190 studio units, 257 one-bedroom units, 229 two-bedroom units, and 4 three-bedroom (penthouse) units, plus 10,000 square feet of ground floor retail uses. Alternative 4B would consist of a single tower with no podium. Accordingly, the building would not extend over the Metro portal within the Project Site, and the Metro plaza would be open to the sky. Based on a total of 708,306 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 6.00:1.[33]

Based on the number and size of dwelling units, Alternative 4B would provide at least 74,025 square feet of open space in accordance with LAMC requirements. Amenity decks offering a variety of social and community spaces would be provided on various

[33] *Under this Alternative, only the Metro portal (4,050 square feet) rather than the entire Metro plaza (9,810 square feet) would count towards FAR due to the elimination of the podium, which effectively serves as a ceiling over the plaza under the Project and the other Alternatives.*

levels and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies would be provided on various levels for some of the residences. In addition, to meet the open space requirement, some recreational facilities could be developed on the roof of the existing parking garage located in the southern portion of the Project Site.

The other aspects of Alternative 4B would be substantially similar to the Project. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage would include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 635 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 4B, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

Similar to the Project, Alternative 4B would require grading and excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 4B would last approximately 55 months (compared to 39 months for the Project).

g. Environmentally Superior Alternative

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service.[34] In addition, Alternative 1 would avoid the Project's significant and

[34] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

unavoidable cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration.[35] However, the No Project/No Build Alternative would not meet any of the Project objectives or achieve the Project's underlying purpose to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 4B, the Residential Alternative B (without podium), would be the Environmentally Superior Alternative. Alternative 4B would not avoid the Project's significant and unavoidable impacts related to on-site construction noise and on- and off-site construction vibration (related to human annoyance), nor would it avoid the significant and unavoidable cumulative impacts related to on- and off-site construction noise and off-site construction vibration, but it would eliminate the Project's significant and unavoidable traffic impacts with respect to operational intersection levels of service.[36,37,38] In addition, Alternative 4B's impacts would be less than the Project's relative to the following issues: greenhouse gas emissions; operational off-site noise; operational impacts on schools; operational traffic (all impact categories); and water supply and infrastructure wastewater, and energy conservation and infrastructure during operations. Alternative 4B's impacts would be the same as the Project's relative to the following issues: aesthetics during construction; toxic air contaminants; historic, archaeological, and paleontological resources; land use consistency and compatibility; construction-related population, housing, and employment; fire protection; construction phase impacts on police protection, schools, libraries, and parks and recreation; tribal cultural resources; and construction-related solid waste. Alternative 4B would, however, result in greater impacts than the Project with respect to the following: aesthetics during operations; regional and localized

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[35] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

[36] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[37] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

[38] *It is noted that Alternative 4A would result in the same significant and unavoidable impacts as Alternative 4B.*

air emissions during construction and operations; hazards and hazardous materials; construction noise and vibration; operational on-site noise; operational population, housing, and employment; operational impacts on police protection, libraries, and parks and recreation; construction traffic; construction-related water supply; solid waste; and construction-related energy conservation and infrastructure, but these impacts would remain less than significant or less than significant with mitigation. In addition, while some Project objectives would be met to a slightly greater or lesser extent, overall Alternative 4B would achieve the Project objectives to approximately the same extent as the Project.

It is further noted that Alternative 4A, the Residential Alternative A (with podium), would result in the same reductions in Project impacts as Alternative 4B. As shown in Table V-1 in Section V, Alternatives, of this Draft EIR, the impact comparisons (relative to Project impacts) for Alternative 4A are identical to those of Alternative 4B. However, when comparing Alternative 4A with Alternative 4B, the latter would have slightly reduced impacts, primarily due to elimination of the podium; thus, although Alternative 4A would be environmentally superior to the Project, Alternative 4B would be slightly more environmentally superior than Alternative 4A. In addition, similar to Alternative 4B, while some Project objectives would be met to a slightly greater or lesser extent, overall Alternative 4A would achieve the Project objectives to approximately the same extent as the Project. Nonetheless, both Alternative 4A and Alternative 4B are considered environmentally superior to the Project.