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Community Redevelopment Agency
*of the* CITY OF LOS ANGELES

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DATE / FEB 1 - 2007

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CRA File No. 5062
Council District: 9
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Honorable Council of the City of Los Angeles
John Ferraro Council Chamber
200 N. Spring Street
Room 340, City Hall
Los Angeles, CA. 90012

Attention: Alan Alietti, Office of the City Clerk

**COUNCIL TRANSMITTAL:**
Transmitted herewith, is a Board Memorandum adopted by the Agency Board on February 01, 2007 for City Council review and approval in accordance with the "Community Redevelopment Agency Oversight Ordinance" entitled:

**VARIOUS ACTIONS RELATED TO:**
PUBLIC HEARING AND VARIOUS ACTIONS RELATIVE TO THE MIXED-USE GRAND AVENUE PROJECT INCLUDING ENVIRONMENTAL FINDINGS; APPROVALS OF THE DISPOSITION AND DEVELOPMENT AGREMENT BETWEEN THE LOS ANGELES GRAND AVENUE AUTHORITY AND GRAND AVENUE L.A., LLC; GROUND LEASES AMONG THE COUNTY OF LOS ANGELES, THE AGENCY, AND LOS ANGELES GRAND AVENUE AUTHORITY; AND AGREEMENTS TO PROVIDE $24,400,000 IN AGENCY INVETMENT, IN ADDITION TO POTENTIAL GROUND LEASE REVENUES, FOR: (1) DEVELOPMENT OF TWO COUNTY-OWNED PARCELS, PARCEL Q (100 SOUTH GRNAD AVENUE) AND PARCELS W-2 (440 WEST FIRST STREET) AND TWO AGENCY-OWNED PARCELS, PARCEL L (220 SOUTH HPE STREET) AND M-2 (236 SOUTH HOPE STREET), IN THE BUNKER HILL REDEVELOPMENT PROJECT AREA; (2) REDESIGN OF THE GRAND AVENUE CORRIDOR BETWEEN FIFTH STREET AND CESAR E. CHAVEZ AVENUE IN THE BUNKER HILL AND AMENDED CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT AREAS; AND (3) PUBLIC PARK IMPROVEMENTS FOR A 16-ACRE CIVIC PARK IN THE AMENDED CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT AREA.

**RECOMMENDATION**
That City Council approve(s) recommendation(s) on the attached Board Memorandum and adopt the attached Resolution making environmental findings and adopting a Statement of Overriding Considerations.

## ENVIRONMENTAL REVIEW

The Los Angeles Grand Avenue Authority ("Authority") is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) for preparation of the EIR for the Project. On November 20, 2006, the Authority certified the Final EIR for the Grand Avenue Project, made written findings for each significant environmental effect of the Project, and adopted a Mitigation and Monitoring Program and a Statement of Overriding Considerations. The Agency and City Council are responsible Agencies under CEQA. Pursuant to state CEQA Guideline Section 15096, the City Council must also make findings and adopt a Statement of Overriding Considerations with respect to the Project as required under Public Resources Code Section 21081 and State CEQA Guidelines Section 15096.

## FISCAL IMPACT STATEMENT

There is no fiscal impact to the City's General Fund, as a result of this action.

Cecilia V. Estolano, Chief Executive Officer

cc: Alan Alietti, Office of the City Clerk (Original & 3 Copies on 3-hole punch)
Lisa Johnson Smith, Nancy Duong, Office of the CAO
Paul Smith, Ivania Sobalvarro, Office of the CLA
Adriana Martinez, Office of the Mayor
Noreen Vincent, Office of the City Attorney
Jan Perry, Council District 9

RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOS ANGELES, CALIFORNIA, CERTIFYING THAT THE CITY COUNCIL HAS REVIEWED AND CONSIDERED THE INFORMATION CONTAINED IN THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED GRAND AVENUE PROJECT; MAKING CERTAIN FINDINGS REGARDING THE ENVIRONMENTAL IMPACTS OF THE PROPOSED GRAND AVENUE PROJECT; ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS; AND ADOPTING A MITIGATION AND MONITORING REPORTING PROGRAM

WHEREAS, pursuant to the California Environmental Quality Act ("CEQA") the Grand Avenue Joint Powers Authority ("Authority") as the lead agency prepared an Environmental Impact Report ("EIR") for the development of the Grand Avenue Project; and

WHEREAS, on November 20, 2006 the Authority certified that the Final EIR was completed in compliance with the CEQA and State Guidelines adopted pursuant thereto, and adopted findings, a Mitigation Monitoring and Reporting Program, and a Statement of Overriding Considerations; and

WHEREAS, the City of Los Angeles is a responsible agency pursuant to CEQA; and

WHEREAS, CEQA requires a responsible agency to make certain findings regarding the portion of the project being approved by the responsible agency; and

WHEREAS, the City Council has reviewed and considered the information contained in the Final EIR for the Project and other documents in the record with respect to the Project and that its findings and decision on the Project reflects its independent judgment.

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Los Angeles, California, as follows:

1. The City Council hereby makes the findings regarding the environmental impacts of the Project, as set forth in the document entitled "The Los Angeles Grand Avenue Authority's Findings Concerning The Potential Environmental Effects Of The Grand Avenue Project And The Certification Of The Final Environmental Impact Report And The Statement Of Overriding Considerations For The Grand Avenue Project" ("the Findings"), Exhibit I of this resolution, pursuant to Section 15091 (a) of the State CEQA Guidelines.

2. The City Council finds and determines, pursuant to section 15096 (g) (2) of the State CEQA Guidelines, that there are no feasible, or feasible mitigation measures within its powers, which would substantially lessen or avoid any significant effect the Project would have on the environment as set forth in the Findings.

3. The City Council adopts section XIII of Exhibit 1 to this resolution as its Statement of Overriding Considerations, pursuant to Section 15093 of the State CEQA Guidelines, for the Project.

4. The City Council adopts section XIV of Exhibit 1 to this resolution, which incorporates section III of the Final EIR volume, as its Mitigation Monitoring Program, pursuant to Section 15091 (d) of the State CEQA Guidelines, for the Project.

5. The City Council specifies that the record of the proceedings, upon which its decision is based, is located in the City Clerk's Office, Room 360 City Hall, 200 North Spring Street, Los Angeles, California 90012, pursuant to Section 15091 (e) of the State CEQA Guidelines.

ADOPTED:

THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES, CA

# MEMORANDUM

DATE: FEBRUARY 1, 2007 BH1050 BH3090

TO: AGENCY COMMISSIONERS

FROM: CECILIA V. ESTOLANO, CHIEF EXECUTIVE OFFICER

RESPONSIBLE PARTIES: DAVID RICCITIELLO, REGIONAL ADMINISTRATOR
LEN BETZ, PROJECT MANAGER
MARTHA WELBORNE, MANAGING DIRECTOR, GRAND AVENUE COMMITTEE

SUBJECT: PUBLIC HEARING AND VARIOUS ACTIONS RELATIVE TO THE MIXED-USE GRAND AVENUE PROJECT INCLUDING ENVIRONMENTAL FINDINGS; APPROVALS OF THE DISPOSITION AND DEVELOPMENT AGREEMENT BETWEEN THE LOS ANGELES GRAND AVENUE AUTHORITY AND GRAND AVENUE L.A., LLC; GROUND LEASES AMONG THE COUNTY OF LOS ANGELES, THE AGENCY, AND LOS ANGELES GRAND AVENUE AUTHORITY; AND AGREEMENTS TO PROVIDE $24,400,000 IN AGENCY INVESTMENT, IN ADDITION TO POTENTIAL GROUND LEASE REVENUES, FOR: (1) DEVELOPMENT OF TWO COUNTY-OWNED PARCELS, PARCEL Q (100 SOUTH GRAND AVENUE) AND PARCEL W-2 (440 WEST FIRST STREET) AND TWO AGENCY-OWNED PARCELS, PARCEL L (220 SOUTH HOPE STREET) AND M-2 (236 SOUTH HOPE STREET), IN THE BUNKER HILL REDEVELOPMENT PROJECT AREA; (2) REDESIGN OF THE GRAND AVENUE CORRIDOR BETWEEN FIFTH STREET AND CESAR E. CHAVEZ AVENUE IN THE BUNKER HILL AND AMENDED CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT AREAS; AND (3) PUBLIC PARK IMPROVEMENTS FOR A 16-ACRE CIVIC PARK IN THE AMENDED CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT AREA.

DOWNTOWN REGION (CD 9)

LOAN COMMITTEE REVIEW: December 6, 2006 – Recommended Approval

## RECOMMENDATIONS

A. That the Agency:

1. Hold a Public Hearing pursuant to Health & Safety Code Section 33431 of the California Redevelopment Law regarding the lease of land located at 100 South Grand Avenue (Parcel Q), 440 West First Street (Parcel W-2), 220 South Hope Street (Parcel L), and 236 South

Hope Street (M-2) by the Agency to the Los Angeles Grand Avenue Authority ("Authority") to effectuate the development of the Grand Avenue Project ("Project").

2. Adopt a resolution certifying that the Agency has independently reviewed and considered the environmental effects of the Project as shown in the Grand Avenue Project Final Environmental Impact Report ("EIR") prepared and certified by the Authority and adopt the Environmental Findings, the Mitigation Monitoring Program, and the Statement of Overriding Considerations.

3. Approve the fair market values of Parcels Q and W-2 owned by the County of Los Angeles ("County") and Parcels L and M-2 owned by the Agency based upon the appraisals prepared by CB Richard Ellis for the Authority to be used as the basis for determining the revenue participation distribution formula between the County and Agency pursuant to Section 5.05 of the Joint Exercise of Powers Agreement ("JPA Agreement").

4. Approve the residential, retail and hotel uses described in the Disposition and Development Agreement ("DDA") for the Project parcels in the Bunker Hill Redevelopment Project Area.

5. Authorize the Chief Executive Officer (CEO), or designee, to form and appoint a Project-specific advisory committee that will meet quarterly with the Agency's Jobs Coordinator to help design the uses of job training funds, receive compliance reports regarding local hiring requirements, and provide input to the Agency relating to issues of workforce development, parks, and open space.

B. That the Agency, subject to City Council review and approval:

1. Approve and authorize the CEO, or designee, to execute the First Amendment to the JPA Agreement by and between the County and the Agency for the development and construction of certain properties located in the vicinity of Grand Avenue in Downtown Los Angeles to permit a change in the percentage share of net revenues distribution formula in the event the County or Agency elects to remove any County or Agency owned parcel from the JPA.

2. Approve the Third Implementation Agreement to the 1991 Owner Participation Agreement ("OPA") by and among the County, Agency, and Walt Disney Concert Hall (or its successor in interest) to amend said OPA to allow retail and hotel as permissible uses on Parcels Q and W-2.

3. Approve the form and substance of the DDA and contemplated ground leases between the Authority and Grand Avenue L.A., LLC ("Developer") delineating the terms and conditions for development and lease of Parcels Q, L, M-2, and W-2 as part of the Project.

4. Approve and authorize the CEO, or designee, to: (a) execute the County-CRA Ground Lease to transfer a leasehold interest in the Phase I Parcel (Parcel Q) from the County to the Agency; and (b) negotiate and execute a future County-CRA Ground Lease in substantially similar form for Phase III (Parcel W-2) consistent with the DDA prior to Phase III development.

5. Approve and authorize the CEO, or designee, to: (a) execute the CRA-Authority Ground Lease to transfer a sub-leasehold interest in the Phase I Parcel (Parcel Q) from the Agency to the Authority; and (b) negotiate and execute future CRA-Authority Ground Leases in

substantially similar form for Phase II (Parcels L and M-2) and for Phase III (Parcel W-2) consistent with the DDA and the Conveyance and Funding Agreement ("CFA").

6. Approve and authorize the CEO, or designee, to execute the Non-Disturbance Agreement ("NDA") by and among the County, Agency, Authority, and Developer which provides that the Authority-Developer Lease or an operator's lease will not be terminated in the event the CRA-Authority Ground Lease or Authority-Developer Lease is terminated.

7. Adopt a joint resolution (Attachment A) making certain findings in accordance with Health & Safety Code Sections 33445 and 33421.1 in support of the use of Agency funds for public improvements for the Project.

8. Approve and authorize the CEO, or designee, to execute the Funding Agreement for Public Space Improvements between the County and Agency.

9. Approve and authorize the CEO, or designee, to execute the Conveyance and Funding Agreement between the Agency and Authority to establish the process for the conveyance of leasehold interests of Agency-owned parcels and sub leasehold interest of County owned parcels to the Authority upon execution of the ground lease(s) and to document the Agency's funding commitments towards the Civic Park, affordable housing, Grand Avenue streetscape improvements, on-site public space improvements, and off-site improvements.

10. Approve and authorize the CEO, or designee, to execute the Grand Avenue Phase I Incentive Rent Agreement by and among the Agency, City, County and Authority to provide for the repayment of any City Transient Occupancy Tax from Phase I Hotel and Retail Incentive Rents.

11. Direct the CEO, or designee, to report back to the Board of Commissioners on the use of Project-related Incentive Rents received by the Agency for all phases to fund job training programs for the Grand Avenue Project; and authorize the CEO, or designee, to seek County participation in job training programs for the Grand Avenue Project.

12. Authorize the CEO, or designee, to negotiate a funding agreement with the Developer in which the Developer makes available $750,000 to $1,500,000 for a revolving loan program over a ten-year period to finance the development of permanent supportive housing projects located within a five-mile radius of the Grand Avenue Project.

13. Direct the CEO, or designee, to negotiate with the Developer a local entry-level apprentice goal whereby a percentage of the construction apprentice workforce shall consist of local low-income residents and to submit a progress report to the Board of Commissioners within 6 months of this action or 30 days prior to the start of construction, whichever is sooner.

## SUMMARY

The recommended actions will make the required environmental findings, adopt a Mitigation Monitoring Program, adopt a Statement of Overriding Considerations and approve various documents and agreements, including the DDA and ground leases, to proceed with the Grand Avenue Project ("Project") – a phased mixed-use development on two County-owned parcels (Q and W-2) and two Agency-owned parcels (L and M-2) in the Bunker Hill Redevelopment Project Area as well as the 16-acre Civic Park in the Amended Central Business District Redevelopment Project.

In September 2003, the County and Agency entered into a JPA Agreement and created the Authority. The Authority then contracted with the Grand Avenue Committee ("GAC") to serve as its real property negotiator. Empowered to select a developer for the Project through a public competitive process per the JPA Agreement, the Authority Board selected the Related Companies, L.P., a New York limited partnership, as the Project developer on September 15, 2004. Subsequently, on January 23, 2006, the Authority approved the substitution of the Project developer by Grand Avenue L.A., LLC ("Developer"), a joint venture formed between Related Grand Avenue, LLC (a wholly owned subsidiary of the Related Companies) and CUIP Grand Avenue, LLC ("CUIP"), which is wholly owned by California Urban Investment Partners, LLC (an entity owned 97% by the California Public Employee Retirement System (CalPERS) and 3% by MacFarlane Urban Realty Company, LLC).

A Project Implementation Plan ("IP") was prepared and approved by the Authority on May 23, 2005, the Agency Board on June 16, 2005, the City of Los Angeles on July 20, 2005, and the County on August 9, 2006. The IP set the parameters for the Authority to prepare an EIR, negotiate a DDA, and finalize the terms and conditions of various ground leases and financing documents. The Project Scope of Development, previously approved as part of the IP, has been refined through negotiations and is summarized in the following section. Subsequently, on November 20, 2006 the JPA certified and approved the final EIR, DDA and ground leases for the proposed Project.

Overall Project Description

The Project is located on a site consisting of (i) four non-contiguous parcels of land, currently used for parking, owned by the County (Parcels Q and W-2) and Agency (Parcels L and M-2) and a possible fifth privately owned parcel (Parcel W-1) which may be acquired by the Developer, (ii) the Grand Avenue right-of-way between 5th Street and Cesar E. Chavez Avenue, and (iii) the Los Angeles Civic Center Mall between Grand Avenue and Spring Street. A project location map, parcel map, development parcel site plan, and Civic Park site plan are provided in Attachment B.

The proposed development includes upwards of 3.2 million square feet, streetscape improvements along Grand Avenue between 5th Street and Cesar E. Chavez Avenue and an upgrade and expansion of the existing County Mall into a 16-acre Civic Park that will span from City Hall to Grand Avenue. The Project will consist of up to 2,660 new residential units including up to 532 affordable units, a five star hotel, up to 449,000 square feet of retail uses, and public parking. The Project also provides for two development options which include a possible 681,000 square foot County Office Building and a Project with Additional Residential Development. An Equivalency Program which provides flexibility for modifications to land uses and square footages within the five parcels has been included so the Project can best respond to future needs in a manner that would not increase the Project's impacts on the environment. The scope of the Project, including a comparison to the IP, is summarized in the following table and in Attachment C.

Construction is expected to begin in Fall 2007 and be completed in 2016. Total cost of the Project is approximately $2.05 billion.

**TABLE 1: SCOPE OF DEVELOPMENT**

| SCOPE OF DEVELOPMENT | IMPLEMENTATION PLAN | DDA |
|---|---|---|
| Hotel Rooms | 225 to 275 (4 Star) | 275 (5 Star) |
| Market Rate Units | 2,100 to 2,600 * | 2,060 to 2,660 * |
| Affordable Units | 420 to 520 * | 412 to 532 * |
| Office | Up to 681,000 sf * | No change |
| Retail | 350,000 to 400,000 sf | 449,000 sf |
| Parking | 4,800 to 5,500 * | 5,035 to 5,255 * |
| Affordability | 20% of total; half at 80%, half at 50% AMI | 20% of total; all affordable rental units at 60% AMI or below **; affordable for-sale units to remain at same affordability levels |
| Total Project Costs | $1.55 billion | $2.05 billion (including Parcel W-1) |

** Depending upon exercise of County Office Building Option on Parcel W-2*
*** The Developer will be seeking 4% tax credits for the affordable rental units in Phase I, in which case all of the units will be at or below 60% of AMI.*

Project Phasing Descriptions

Phase I: Development on County-owned Parcel Q will include: (i) a high-rise tower up to 50 stories on the corner of Grand Avenue and 2nd Street containing a five star 275 room hotel with 250 market rate condominiums above the hotel, (ii) approximately 284,000 square feet of retail, including a grocery market, bookstore, several boutique restaurants, health club and other specialty shops, (iii) a residential tower up to 30 stories, at the corner of Olive Street and 1st Street, containing 100 affordable rental apartments on the lower levels on a separate legal air space parcel and 150 market rate condominiums above the apartments, (iv) approximately 1,510 subterranean parking spaces, (v) streetscape improvements along Grand Avenue, and (vi) a new 16-acre Civic Park extending from Grand Avenue to the Los Angeles City Hall. Construction is scheduled to start by October 2007 and be completed by June 2011.

Phase II: Development on Agency-owned Parcels L and M-2 will comprise approximately 101,000 square feet of retail, 850 residential units (including 170 affordable housing units), parking, and additional streetscape improvements on Grand Avenue. Construction is scheduled to start March 2012 and completed within 30 months.

Phase III: Development on County owned Parcel W-2 (and potentially Parcel W-1) is anticipated to consist of up to 1,310 units of market-rate and affordable housing, 64,000 square feet of retail, parking, and an optional office building of 681,000 square feet. The County is considering possible sites for a replacement Hall of Administration and one such site is the County-owned Parcel W-2. Hence, the Project consists of two development options for Phase III, referred to as the "County Office Building Option" and the "Additional Residential Development Option". The two options are to address the potential future uses of the County-owned Parcel W-2 and privately-owned Parcel W-1. The Developer has initiated discussions for the purchase of adjacent privately-owned Parcel W-1. The charts in Attachment D detail the proposed Scope of Development of the Grand Avenue Project with and without the County Office Building Option.

Schematic drawings for all phases will be submitted to the Agency for approval. The Schedule of Development is detailed in Attachment E.

Structure of Ground Leases

In order to implement the Project through the Authority, the County will transfer its Phase I (Parcel Q) and Phase III (Parcel W-2) parcels within the times set forth in the DDA through leases to the Agency. The Agency will then transfer these properties through sub-leases to the Authority. The Agency will also transfer its Phase II (Parcels L and M-2) properties through a lease to the Authority at the time set forth in the DDA. The Authority will then transfer the properties through leases to the Developer. This structure allows for the disposition of properties by the County and the Agency for redevelopment purposes in accordance with State law.

Public Investment

A public investment of $29 million comprised of $24.4 million from the Agency and $4.6 million from the County will be contributed to the Project principally in Phase I. A summary of the Public Investment for the Project is provided in the following chart.

**TABLE 2: PUBLIC INVESTMENT SUMMARY**

| Item | Cost | Source |
|---|---|---|
| Affordable Housing Contribution | $10 million | Payable from Agency Low and Moderate Income housing funds for 100 affordable rental units (20% of total units) Phase I only. Subsequent Phase housing assistance will be limited to Agency low and moderate income housing tax increment revenue generated by Project Phase at $100,000 per affordable rental unit and $200,000 per affordable for-sale unit (both escalated at CPI for subsequent phases). |
| Onsite Publicly Owned Improvements | $12 million | Reimbursement of $7.4 million from site specific tax increment and $4.6 million in County funds (up to $3 million to be repaid to the County from excess Agency tax increment from Phase I) for: (i) public plaza at the Grand Avenue level (approx. $8.7 million); (ii) elevators and escalators (approx. $1.3 million); (iii) retail parking garage waiting areas (approx. $0.3 million); public space amenities such as seating, bicycle racks, water fountains etc (approx. $0.4 million); and soft costs including design costs, permit and inspection fees etc. (approx. $1.3 million). |
| Offsite Publicly Owned Improvements | $5 million | Bunker Hill tax increment funds eligible for repayment from excess parking revenues for: (i) utility services to property line and other utility upgrades and relocations (approx. $0.3 million); (ii) required Phase I roadway widening (approx. $1.7 million); (iii) EIR required traffic mitigations including ATCS upgrades and improvements to Hill and 3rd Streets (approx. $2.5 million); and (Iv) soft costs such as engineering and design costs, permits and inspection fees (approx. $0.5 million). |
| Grand Avenue Streetscape Improvements | $2 million | Bunker Hill site-specific tax increment revenue of $1 million in Phase I and $1 million in Phase II. |
| **TOTAL** | **$29 million** | $24.4 million from the Agency / $4.6 million from the County. |

As part of the Phase I development, the 16-acre Civic Park located along the County Mall extending from Grand Avenue to the Los Angeles City Hall will be developed. The Park development will be funded from Phase I prepaid ground rent and from the deposit of Phase II prepaid ground rent in the aggregate amount of $50 million.

In addition, the City of Los Angeles is in discussions with the Developer to provide financial assistance to the Hotel through a rebate of the City's Transient Occupancy Tax ("TOT") generated by the Hotel over a specified number of years of operation. The City is also in discussions to provide financial assistance to the parking structure, using City Parking User Tax revenues generated by the Project. The City's assistance for both the hotel and parking structure would be provided through a Community Taxing District ("CTD") on the Phase I Site.

Project Economics

The overall Project consists of three phases spanning an anticipated eleven-year period. The total development costs for the three phases is estimated at $2.05 billion (including the Civic Park and Parcel W-1). The Phase I component has an estimated development cost of approximately $775 million. Several factors contribute to the above average construction costs, including: the high-rise design across multiple levels; the incorporation of large plazas; the proposed project labor agreement; and the extensive public improvements. A detailed financial feasibility analysis was conducted for each land use in Phase I, including hotel, market rate condominiums retail, parking and affordable housing. The Agency has worked with several consulting firms to complete the financial analysis, including Keyser Marston Associates, Katz Hollis, Seifel Consulting, PKF Consulting and Walker Parking Consultants. Their analyses conclude that the Project is not feasible without significant public assistance.

In summary, the financial analysis indicates that the returns on investment, without public assistance, for the commercial components are below industry standards for a Project with this level of complexity and risk. The estimated profit margins for the market rate residential component are also below industry standards for a Project of this magnitude with no existing comparable project in the downtown market.

Hotel Component

The hotel in Phase I will be contained in the lower portion of a 50-story tower designed by Frank Gehry. The Type I construction of the building results in substantial development costs. As indicated in the table below, the hotel component has an estimated total development cost of $185 million, or $665,000 per room. This figure includes the prorated share of the ground rent attributed to the hotel development. Although high, the estimated development costs for the Grand Avenue hotel are comparable to similar projects that are in the late stages of pre-development or under-construction within the market area (defined as Los Angeles County). Total development costs for comparable projects range from $310,000 to $629,000 per room.

**TABLE 3: HOTEL DEVELOPMENT COSTS**

| **Hotel Development Costs** | |
|---|---|
| Direct Costs | $128,000,000 |
| Indirect Costs | $47,000,000 |
| Land Costs | $10,000,000 |
| **Total Development Costs** | **$185,000,000** |

A financial analysis indicates that the hotel component has a significant funding gap. Absent a significant infusion of public investment, the hotel component does not meet current investment parameters. As indicated in the table below, the return on costs (excluding any potential public assistance) are projected to be in the in the 5% to 7% range during the first three years of stabilized operation.

**TABLE 4: HOTEL RETURN ON COST**

| | Year 1 | Year 2 | Year 3 |
|---|---|---|---|
| Net Operating Income | $8,400,000 | $12,000,000 | $13,300,000 |
| Return on Cost | 4.5% | 6.5% | 7.2% |

The Developer is negotiating with the City regarding a public assistance package, which includes an offset of the City's Transient Occupancy Tax ("TOT") to address the funding gap.

Retail Component

As indicated in the table below, the retail component in Phase I has an estimated total construction cost of $142 million or approximately $556 per square foot of gross building area. The total costs include a pre-paid ground rent and extensive off-site improvements which can be attributed to the retail component.

**TABLE 5: RETAIL DEVELOPMENT COSTS**

| **Retail Development Costs** | |
|---|---|
| Direct Costs | $97,471,000 |
| Indirect Costs | $39,321,000 |
| Land Costs | $5,327,000 |
| **Total Development Costs** | **$142,119,000** |

At stabilization, the retail component is expected to attain a net operating income ("NOI") of approximately $13.7 million. Without public assistance, the return on cost for this component would be below 10%, the minimum threshold for attracting capital for this type of Project.

Public Parking

The Phase I public parking structure consists of 763 spaces allocated to the retail segment and 137 allocated to the hotel. The parking garage has a total development cost of $85,000 per stall.

In order to attract patrons to the retail center, the parking rates must be competitive with competing retail outlets. As a result the structure will have a significant amount of validated parking, which will constrain the overall revenue stream. The financial analysis suggests that the projected NOI from the parking structure will not be sufficient to cover the debt and overall operating expenses without public assistance.

The Developer is negotiating with the City regarding a public assistance package, which includes a rebate of the Parking User Tax, to address the funding gap. The City's Parking User Tax is expected to be repaid over time from parking income generated from the structure.

Condominiums

Currently, it is estimated that there will be a total of 400 market rate condominiums in Phase I. The total development costs for the 250-units above the hotel are estimated at $854,000 per unit or over $730 per net salable square foot. The condominium units in the mixed-use residential tower have a total development cost of approximately $655,000 per unit or $675 per square foot of net building area. Despite estimated sale prices that average $850 per square foot for the luxury condominiums above the hotel and $750 per square foot for the mid-rise condominium units, the profit as a percentage of net sale proceeds are well below industry standards, ranging from 7% to 10%. However, despite the apparent slowdown in the local housing market, the residential component does have significant upside potential.

Affordable Housing

Each phase of the Project is proposed to have, at a minimum, a 20% affordability requirement, with all of the restricted units at Lower Income (60% of Area Median Income ("AMI")) levels or below. The Developer's obligation to provide the affordable housing in Phases II and III is contingent upon the Agency' s ability to provide gap financing. The Agency will provide Low and Moderate Income Housing Funds assistance of $100,000 per unit of affordable rental housing and $200,000 per unit of affordable housing for sale with both escalated per the Consumer Price Index ("CPI"). The Agency will provide an upfront $10 million loan for the Phase I affordable housing to be paid in four installments. The 20% site specific housing trust fund dollars generated by all three phases, as well as any available non-housing tax increment (80%) funds from Phases II and III, will be dedicated to fund up to the unit maximum gap financial assistance for Phases II and III affordable housing.

For Phase I, the Agency will provide a $10,000,000 residual receipts loan with a term of 55 years at 3% simple interest for the development of 100 affordable units of rental housing, of which 35% will be restricted for Extremely Low Income households (35% AMI or below) and 65% for Very Low Income households (50% AMI or below) (see Attachment F for the proposed unit mix). In accordance with the DDA, the affordable units will be located on the lower levels on a separate legal air space parcel, and the market rate condominiums will be located on the upper levels of the mid-rise residential tower. However, occupants of the affordable units shall have equal access through the same front entrance, parking elevator, parking garage access, common ground floor building lobby and all other building common areas as those occupants living in the market rate units.

The total estimated cost for the Phase I affordable housing component is $39.1 million or $391,000 per unit. The affordable housing component has an estimated funding gap of approximately $14.4 million. The Agency will provide the afore-mentioned $10,000,000 residual receipts loan and the Developer will provide approximately $4.4 million in equity. The Developer intends to apply for 4% tax credits combined with Multifamily Housing Program funds. As indicated in the table below, it is anticipated that the tax credits will cover 56% of the total costs.

**TABLE 6: PHASE I AFFORDABLE HOUSING FUNDING SOURCES**

| **Permanent Sources** | | **% Of Total** |
|---|---|---|
| Tax Credit Equity | $21,800,000 | 56% |
| Permanent financing | $ 2,960,000 | 7% |
| AGENCY Residual Receipt Loan | $10,000,000 | 26% |
| Developer Equity | $4,375,000 | 11% |
| **Total Development Costs** | **$39,135,000** | **100%** |

Agency and County Revenue Participation

Both base ground rents and incentive rents will be allocated between the County and the Agency, as summarized in Attachment G, in proportion to the appraised fair market value of the County's parcels (Q and W-2) as compared with the Agency's parcels (L and M-2). An outside appraisal was prepared which calculated the total fair market value of all development parcels at $143.45 million. The County parcels are valued at $97.25 million (67.8 percent of total) and the Agency parcels are valued at $46.20 million (32.2 percent of total). The percentage share of all rents that accrue to the Authority will be distributed to the County and Agency at 67.8 and 32.2 percent, respectively. It is anticipated that the Developer will pay approximately $148.5 million in base rent for all phases, assuming all market rate housing will be built as condominiums and the Additional Residential Development Option is exercised, in addition to any incentive rent generated.

Loan Committee

On December 6, 2006, the Agency's Loan Committee considered the subject financial participation and loan of funds and moved to recommend unanimous approval of the Project to the Board of Commissioners. In its deliberations, the Committee reviewed the catalytic economic and redevelopment impacts for Bunker Hill as well as for Downtown through the development of the four publicly held underutilized parcels of land. The Committee discussed the financial analysis which indicated that the returns of investment, without public assistance, for the commercial component are below industry standards for a Project with this level of complexity and risk. The Committee further noted that there is a strong possibility that the Agency will not recoup the $5 million investment, which is structured to be repaid from surplus cash generated by the public garage component. In review of the affordable housing loan, the Committee reviewed the underwriting issues raised by staff pertaining to the outstanding funding gap of approximately $4.4 million that is to be funded by the Developer.

Community Benefits

The mission of the Bunker Hill Redevelopment Plan is to eliminate blight and to stimulate economic development while providing affordable housing and jobs. The Project offers substantial community benefits, including affordable housing, permanent supportive housing, local job opportunities, job training, public open space improvements (including the Civic Park), public art, and sustainable development goals. For further detail, see Attachment H – "Summary of Community Benefits" and Attachment I – "Local Hiring Plan".

The Developer has agreed to capitalize $750,000 to $1,500,000 for a revolving loan program to fund non-profits over a ten-year period to develop permanent supportive housing within a five-mile radius of the Project site. As currently proposed, the Developer will provide $1,500,000 until the initial three predevelopment loans have been repaid, after which the Developer may reduce the total amount available to $750,000 for the balance of ten years. Details are to be worked out between the Agency and Developer and staff will report back to the Board on the parameters and details of the program, commitments reached with the Developer, and an implementation proposal within 6 months of this action, or before the issuance of any construction permits (not including excavation, foundation, or grading) for Phase I.

In addition to the Developer's contribution of $500,000, staff recommends that the Agency commit its share of Project-related incentive rents and other available funds in the aggregate amount of $500,000, plus up to $850,000 on a dollar-for-dollar matching basis for any other funding source, to provide specialized job training targeting local and at-risk populations for the Project. For Phase I,

the Agency's expected share of incentive rent is estimated at $300,000 in 2006 dollars. Staff further recommends that the Agency engage the County in providing job training funds to match the Developer's contribution of $500,000.

One issue that remains to be resolved concerns the inclusion of a minimum 10% local low-income resident hiring requirement for permanent jobs. As currently drafted in Exhibit S, Part Two, Section V.C., (attached hereto as Attachment I), should the Developer and/or permanent employer fail to meet the minimum 10% requirement, additional penalties in the amount of $1,250 will be assessed for each full-time equivalent (FTE) short of the requirement. This matter will be settled before the Project is submitted to the City Council for its consideration.

Pending negotiations with the Developer and building trades, another local hiring provision that remains outstanding is the establishment of a local entry-level apprentice goal whereby a percentage of the construction apprentice workforce shall consist of local low-income residents. Staff will submit a progress report to the Board within 6 months of this action or 30 days prior to the start of construction, whichever is sooner regarding this matter.

RE

June 16, 2005 and July 20, 2005 – Agency Board and City Council, respectively, approved the Implementation Plan for the Grand Avenue Project.

September 4, 2003 and September 12, 2003 – Agency Board and City Council, respectively, approved the execution of a Joint Exercise of Powers Agreement with the County of Los Angeles to form and fund the Los Angeles Grand Avenue Authority to negotiate and manage the coordinated development of two Agency-owned parcels and two County-owned parcels on Grand Avenue and the expenditure of up to $375,000 for costs associated with the operations of said Authority.

SOURCE OF FUNDS

Bunker Hill Tax Increment, Bunker Hill Low and Moderate Income Housing Funds; County of Los Angeles contribution of $4.6 million

ENVIRONMENTAL REVIEW

The Authority is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) for preparation of the EIR for the Project. On November 20, 2006, the Authority certified the Final EIR for the Grand Avenue Project, made written findings for each significant environmental effect of the Project, and adopted a Mitigation and Monitoring Program and a Statement of Overriding Considerations. The Agency is a Responsible Agency under CEQA. Pursuant to State CEQA Guidelines Section 15096, the Agency must also make findings and adopt a Statement of Overriding Considerations with respect to the Project as required under Public Resources Code Section 21081 and State CEQA Guidelines Section 15096. The recommended actions implement and further the purposes of CEQA.

PROGRAM AND BUDGET IMPACT

The recommended actions are consistent with the Agency's FY07 Work Program for the Bunker Hill Redevelopment Project and specifically for the goals for the development of the two Agency owned Parcels and the surrounding streetscape. The actions are further consistent with the Five-Year Implementation Plan for the Bunker Hill Redevelopment Project and are budgeted in the FY07

Budget in the BH1050 and BH3090 objectives. There is no impact on the City's General Fund as a result of the proposed Agency actions; however, the City may separately consider its public investment using Project-generated hotel and parking tax revenues.

BACKGROUND

The overall goal of the Grand Avenue Project is to create a vital urban destination in the heart of Downtown Los Angeles. Building upon the one-of-a-kind attractions that already exist in this area, this Project will add a mixture of uses that will complement and expand upon the success of the area and establish attractive, new destinations. The Project will also expand the Bunker Hill residential community with additional high quality market rate and affordable housing, thereby expanding opportunities for people to live close to the wide range of employment, cultural, entertainment, and retail activities that exist in Downtown Los Angeles.

The Grand Avenue Project is focused on transforming the civic and cultural districts of downtown Los Angeles into a vibrant new regional center, which will showcase entertainment venues, restaurants, and retail mixed with office buildings, a hotel, and approximately 2,660 new housing units. These new features will add to the notable structures that already exist in Bunker Hill including the Walt Disney Concert Hall, the Colburn School, Museum of Contemporary Art (MOCA), the Cathedral of Our Lady of the Angels, and the Music Center. Also included as part of the project is redevelopment of the existing County Mall, which will be transformed into a 16-acre Civic Park stretching from the Music Center to City Hall, and streetscape improvements to Grand Avenue from Fifth Street to Cesar E. Chavez Avenue. The Phase I and Phase II components include funding to construct streetscape improvements for the portions of Grand Avenue that front on Parcels Q, L, and M-2.

Grand Avenue is the primary boulevard serving Bunker Hill. It provides the link between the Civic Center and the Downtown Financial District. Major institutions such as the Los Angeles Music Center, Los Angeles County Hall of Administration, Los Angeles Central Library, and the Cathedral of Our Lady of the Angels line Grand Avenue north and south of Bunker Hill and add to the prestigious institutions on the Hill. The corridor includes one of the highest concentrations of signature structures designed by world-renowned and international prize-winning architects in the world.

The Agency is a major property owner along Grand Avenue. The Agency owns two as-yet undeveloped parcels (Parcels L and M-2) on the west side of Grand Avenue between the Walt Disney Concert Hall and the Grand Promenade Apartments across from the Museum of Contemporary Art (MOCA) and the Colburn School. The two County-owned parcels (Parcels Q and W-2) are located directly east of the Walt Disney Hall along Grand Avenue and Olive Street, respectively.

The Joint Exercise of Powers Agreement ("JPA Agreement") between the Agency and the County of Los Angeles requires both parties to fund in an equally shared joint funding arrangement the operations of the Los Angeles Grand Avenue Authority, a separate legal entity, for the purpose of facilitating and coordinating planning and design related activities associated with the Grand Avenue Project.

Pursuant to the JPA Agreement, the Authority was empowered to select a developer to prepare an Implementation Plan for the two Agency-owned and two County-owned parcels of property on Bunker Hill. With funds contributed by the Agency and County, the Authority formally contracted with the Grand Avenue Committee to prepare a Request for Qualifications for the selection of

development teams, which was issued in October 2003. Selected developers were then invited to participate in a Request for Proposals. In August 2004, the Authority selected the Related Companies as the Developer to construct the three-phase Grand Avenue Project development and to prepare the Implementation Plan that set forth the financial and development parameters for the Grand Avenue Project. The Implementation Plan was subsequently approved by the Authority on June 9, 2005 and by the Agency, City, and County shortly thereafter.

Structure of the Transaction and Documents

The legal structure for the Grand Avenue Project requires the execution of a DDA, a series of ground leases between the County and Agency (County-CRA Lease), the Agency and Authority (CRA-Authority Lease), and the Authority and Developer (Authority–Developer Lease) and funding agreements prior to proceeding with the development of the County and Agency owned parcels. Certain existing agreements between the Agency and County must also be amended to accommodate the Project.

The documents required to carry out this transaction are summarized as follows:

Disposition and Development Agreement (DDA)

The DDA to be executed between the Authority and Grand Avenue L.A., LLC provides for the multi-phased development of the County and Agency owned parcels within the Bunker Hill Redevelopment Project Area and imposes certain financial and community benefit obligations on the Developer, including construction of the Civic Park and various streetscape improvements along the Grand Avenue corridor. More specifically, the Scope of Development negotiated as part of the DDA focuses exclusively on the government-owned properties known as Parcels L, M-2, Q and W-2. While included as a Project alternative, the DDA does not require that the privately-owned Parcel W-1 be included in the development. The terms of the DDA and the Scope of Development are described in Table 1 above.

Ground Leases

The legal structure for the Grand Avenue Project requires the execution of a series of ground leases. For Phase 1 (County-owned Parcel Q), the recommended action requires that the Agency approve the following Ground Lease documents to which the Agency is a party: (a) a ground lease document between the County and the Agency ("County-CRA Ground Lease") to transfer a leasehold interest from the County to the Agency for the purpose of a sublease by the Agency to the Authority and a sub-sublease from the Authority to the Developer, and (b) the ground lease document between the Agency and the Authority ("CRA-Authority Ground Lease") for the sublease of the property from the Agency to the Authority. Execution of the various ground leases will be subject to County and Agency approvals of the DDA, and satisfactory completion of all conditions and requirements to entering the Authority-Developer Ground Lease prior to the transfer of the property to the Developer at such time. In addition, the Developer has certain rights under the Authority-Developer Ground Lease to transfer its interest in each completed component (i.e. residential, retail, hotel, office, etc.) once completed to an operator and to require the Authority to enter into a direct ground lease with the operator via a Developer - Operator Lease.

The properties will be conveyed on an "AS-IS, WHERE-IS AND WITH ALL FAULTS" basis. Upon expiration of the various ground leases, the improvements will revert to the County or the Agency, depending on the fee ownership of the parcels in question.

Although the various ground leases related to Parcel Q will be executed and the property conveyed through the Agency and Authority to the Developer, the construction commencement conditions contained in the DDA must still be met prior to the Developer taking possession of the property. The delay in possession of the parcel for the development will not delay the payment of the $50 million in Leasehold Acquisition Fees (or prepaid ground rent) from the Developer to pay for improvements to the Civic Park.

For future phases, Phase II (Agency-owned Parcels L and M-2) and Phase III (County-owned Parcel W-2), recommendations on subsequent ground lease documentation will be returned to the Authority, as necessary, to execute conforming documents at such time as all applicable conditions and requirements to entering into ground leases for the transfer of each of those parcels have been met.

Non-Disturbance Agreement

The multi-tiered leasing structure mentioned above requires a Non-Disturbance Agreement ("NDA") be executed among the respective parties. The NDA will ensure that the Authority Lease or Developer - Operator Lease will not be terminated as a result of the termination of the County-CRA Lease and/or CRA-Authority Lease. The terms and conditions of the terminated lease(s), therefore, will automatically remain in full force via a direct lease arrangement with the County.

Third Implementation Agreement to the 1991 Owner Participation Agreement

The Third Implementation Agreement to the 1991 Owner Participation Agreement ("TI-OPA") between the County and Agency is intended to allow the Developer to proceed with the development of the County owned properties based on the land-use entitlements negotiated as part of the DDA, which includes construction of residential units not previously identified as a permissible use under the original 1991 OPA. Consequently, the provisions of the DDA to allow residential units as part of the development will supersede the provisions of the 1991 OPA, which limits the development to commercial uses only. However, should the Developer fail to enter into a ground lease for the development of Parcel Q and/or W-2, or the ground lease is subsequently terminated, or the rights of the Developer lapse under the DDA, the provisions of the 1991 OPA shall apply and govern the future development of the County owned properties as if the DDA was not in existence. Execution of the TI-OPA will also preserve the County's right under the 1991 OPA to be reimbursed by the Agency for tax increment funds generated from Parcel Q and W-2 as if the parcels were not located in a redevelopment area.

Agency and Authority Conveyance and Funding Agreement

The Conveyance and Funding Agreement ("CFA") between the Agency and the Authority will establish the procedure for the conveyance to the Authority of a leasehold interest in the Agency's properties and sub-leasehold interest in the County's properties upon execution of the appropriate ground lease(s). The Agency retains review and approval rights over the schematic design drawings for each phase of development. To the extent subsequent stages of the design documents do not logically evolve from the prior stage, the Agency may disapprove the submittal and consult in good faith with the Authority to resolve any disagreements regarding the stage of the design documents. The CFA also contains the parameters for the Agency's public investment to be passed through to the Developer, as detailed in Table 2 above.

Funding Agreement for Public Space Improvements

The County will provide to the Agency $4.6 million to be used to finance the proposed public space improvements. However, $3 million is eligible for repayment to the County from the Agency's future tax increment from Parcel Q that exceed the Agency's pledge of tax increment revenue to the Project. The remaining $1.6 million of County funds recognizes the County's obligation under the 1991 Owner Participation Agreement to pay for the cost of the Upper 2nd Street extension between Grand Avenue and Olive Street. The Agency has committed its tax increment revenue from Phase I to the Project.

Grand Avenue Phase I Incentive Rent Agreement

In the event the City provides the Developer with the TOT rebate assistance, the Authority, Agency, City, and County will agree that the Phase I Incentive Rents from the Hotel and Retail Components will be paid to the City until the City receives the amount of the subsidy it has provided through the CTD.

First Amendment to the Joint Exercise Of Powers Agreement and Fair Market Values of Project Development Parcels

On September 2, 2003, a JPA agreement between the County and Agency created the Los Angeles Grand Avenue Authority. This amendment will amend Section 5.01 of the JPA Agreement by requiring the County and Authority to execute a ground lease once the Developer has satisfied all conditions and requirements precedent to entering into a ground lease with the Authority, including being prepared to commence construction. The Agreement also amends Section 5.05 to allow the County and Agency to reset the net revenue percentage shares in the event the Developer does not enter into a ground lease or ground leases for all of the properties prior to January 1, 2014.

The GAC which serves as the Authority's Real Property Negotiator engaged the services of CB Richard Ellis (CBRE) to prepare an appraisal of the development parcels in order to determine the "fair market value" attributed to the County and Agency owned parcels and to calculate the percentage share of net revenues to be distributed by the Authority to the County and Agency pursuant to the Joint Exercise of Powers Agreement executed between the parties in September 2003. The appraisal reflects a total fair market value of $143.45 million for the subject parcels with the Agency parcels valued at $46.20 million and the County parcels valued at $97.25 million. Consequently, the percentage share of net revenues to be distributed to the County and Agency is 67.8 percent and 32.2 percent, respectively. The total appraised value for the Project development parcels is less than the present value of the estimated base rent for all three phases of $148,537,000, assuming all market rate housing will be built as condominiums and the Additional Residential Development Option is exercised, plus incentive rents.

Cecilia V. Estolano
Chief Executive Officer

By

Glenn F. Wasserman
Chief Operating Officer

There is no conflict of interest known to me that exists with regard to any Agency officer or employee concerning this action.

Attachments:

A 33421.1 AND 33445 Joint Resolution
B Location Map, Parcel Map, Development Site Plan and Civic Park Site Plan
C Scope of Development – Comparison of DDA to Implementation Plan
D Scope of Development – County Office Building Option and Additional Residential Development Option
E Schedule of Development
F Proposed Affordable Housing Income Mix
G Summary of Lease Acquisition Fees and Incentive Rents
H Summary of Community Benefits
I Local Hiring Plan

ATTACHMENT "A"

County Resolution No. _____
City Resolution No. _____
CRA Resolution No. _____
Authority Resolution No. _____

A JOINT RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES, THE CITY COUNCIL OF THE CITY OF LOS ANGELES, THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES, CALIFORNIA AND THE BOARD OF THE LOS ANGELES GRAND AVENUE AUTHORITY MAKING THE FINDINGS REQUIRED BY SECTIONS 33421.1 AND 33445 OF THE CALIFORNIA REDEVELOPMENT LAW AND DETERMINING THAT THE PROVISION OF PUBLIC IMPROVEMENTS IN SUPPORT OF THE GRAND AVENUE PROJECT IN THE BUNKER HILL AND AMENDED CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT AREAS IS OF BENEFIT TO THE BUNKER HILL REDEVELOPMENT PROJECT AREA.

WHEREAS, the Community Redevelopment Agency of the City of Los Angeles, California (the "Agency") is engaged in redevelopment and revitalization of the downtown Los Angeles area pursuant to the adopted Redevelopment Plans for the Bunker Hill Redevelopment Project Area (the "Project Area"); and

Whereas the County of Los Angeles ("County") is a legislative body for the community in which the Grand Avenue Project is located; and

WHEREAS, the City of Los Angeles ("City") is a legislative body for the community in which the Grand Avenue Project is located; and

WHEREAS, the Los Angeles Grand Avenue Authority ("Authority") is the public joint exercise of powers authority formed by the County and Agency for the purpose of implementing the Grand Avenue Project; and

WHEREAS, the Agency adopted the Bunker Hill Urban Renewal Project on March 31, 1959 by Ordinance No. 113231, subsequently amended on January 12, 1968 by Ordinance No. 135900 and on June 25, 1970 by Ordinance No. 140662 (referred to collectively as the "Bunker Hill Redevelopment Plan"); and

WHEREAS, the Bunker Hill Redevelopment Plan provides for the funding, installation, repair or amelioration of public improvements to serve the developments in the Project Area; and,

WHEREAS, the provision of public improvements is consistent with the Bunker Hill Redevelopment Project's Five-Year Implementation Plan in that the Grand Avenue Project (including the Civic Center Park) is listed in the Five-Year Implementation Plan as major contributing project to meeting the goals and objectives of the Redevelopment Plan; and,

WHEREAS, the County and Agency intend to fund through the Authority certain public open space, infrastructure and off-site improvements listed in Exhibit A, which is attached hereto and incorporated herein by this reference, in part, from $14.4 million of Agency Bunker Hill tax increment funds, $4.6 million of

funds from the County and the County's and Agency's shares of the $50 million of Ground Rent to be received from the Grand Avenue Project developer to fund the Civic Center Park; and,

WHEREAS, the City and County have each investigated the sources of public funds available in the respective City and County sources, by reviewing the capital improvement budgets for each of the City and County, respectively (as well as other sources available to each), and concluded that there are no other reasonable funding sources available to contribute to the cost of the public improvements listed in Exhibit A; and,

WHEREAS, Sections 33421.1 and 33445 of the California Health and Safety Code provides that the Authority, Agency, City, and County are to make certain findings before redevelopment agency funds may be used to pay for such public improvements inside or outside of the Project Area; and,

WHEREAS, the Board of the Authority, the Commissioners of the Agency, the City Council of the City of Los Angeles and the Board of Supervisors of the County, have reviewed and considered the facts and information with respect to the public improvements.

NOW THEREFORE, THE BOARD OF THE LOS ANGELES GRAND AVENUE AUTHORITY, THE COMMISSIONERS OF THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES, CALIFORNIA, THE CITY COUNCIL OF THE CITY OF LOS ANGELES AND THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES DO HEREBY RESOLVE AS FOLLOWS:

The Authority, Agency, City and County find, determine and resolve that:

1) The provision of the public improvements listed in Exhibit A in support of the Grand Avenue Project in the Bunker Hill and Amended Central Business District Project Areas is of benefit to the Bunker Hill Redevelopment Project in that it will assist in eliminating one or more blighting conditions and is necessary to effectuate the Redevelopment Plan because of the:

    a. critical nature of the inter-related transportation and transit and pedestrian circulation system that connects the areas serving the Grand Avenue Project to Bunker Hill, Amended Central Business District, and the surrounding neighborhood; and

    b. ability to increase tourism and patronage of renowned cultural institutions along the Grand Avenue corridor in Bunker Hill through the attraction of tourism business to the Grand Avenue Project and the surrounding neighborhood; and

    c. provision of a 16-acre Civic Park, outdoor public plazas, and other public space amenities, such as benches, street trees, and landscaping, in the Grand Avenue Project will help to remedy the lack of public and green spaces in the Bunker Hill Project area, the

surrounding neighborhood and throughout downtown Los Angeles; and

d. creation of synergies from overall activities in and around the Grand Avenue Project that will make Los Angeles a more desirable place to live, work, and play that will over time increase the property values in the Bunker Hill Redevelopment Project Area and related tax increment and create the necessary demand to develop the remaining vacant land parcels in the Bunker Hill Redevelopment Project.

2) The City finds that after pursuing an investigation for funding sources from the City, the public improvements listed in Exhibit A to facilitate the Grand Avenue Project are not in the City's capital improvement budget for funding and no other reasonable means of financing the public improvements consistent with the purpose of the Bunker Hill Redevelopment Plan is available.

3) The County finds that after pursuing an investigation for funding sources from the County, the public improvements listed in Exhibit A to facilitate the Grand Avenue Project are not in the County's capital improvement budget for funding and no other reasonable means of financing the public improvements consistent with the purpose of the Bunker Hill Redevelopment Plan is available.

4) Provision of the public improvements is consistent with the Five-Year Implementation Plan for the Bunker Hill Project Area, adopted by the Agency on September 1, 2005, in that it will help address the remaining redevelopment issues on Bunker Hill that relate to: lack of public park areas, landscaping; historically depressed property values, and remaining undeveloped land.

5) Each of the public bodies may adopt this Resolution and make its findings at separate meetings and when adopted by all four public bodies shall constitute the joint resolution and findings of the County, City, Agency and Authority.

ADOPTED BY THE AUTHORITY:

ADOPTED BY THE COUNTY:

ADOPTED BY THE AGENCY:

ADOPTED BY THE CITY:

EXHIBIT A

## PUBLIC IMPROVEMENTS

PARCEL Q PUBLIC SPACE IMPROVEMENTS

| | |
|---|---|
| Public plaza at the Grand Avenue level, including paving, landscaping, planters, railings, bollards, irrigation, water features, plaza stairways, exterior lighting and associated fixtures; | $8,666,666 |
| Elevators and escalators, and related walkways, stairs and hardscape areas, providing public pedestrian access from the public parking garage levels through to the public plaza at the Grand Avenue level; | 1,333,333 |
| Reception/waiting vestibule areas in retail parking garage levels that connect to public elevators and escalators; and | 277,778 |
| Public space amenities, including benches and other seating, trash receptacles, wayfinding systems, bicycle racks, water fountains, and other improvements typical in public spaces. | 388,890 |
| Soft costs associated with producing the public improvements listed above, for example: design costs and fees; permit and inspection fees, project management costs | 1,333,333 |
| TOTAL: | $12,000,000 |

PROJECT OFFSITE IMPROVEMENTS

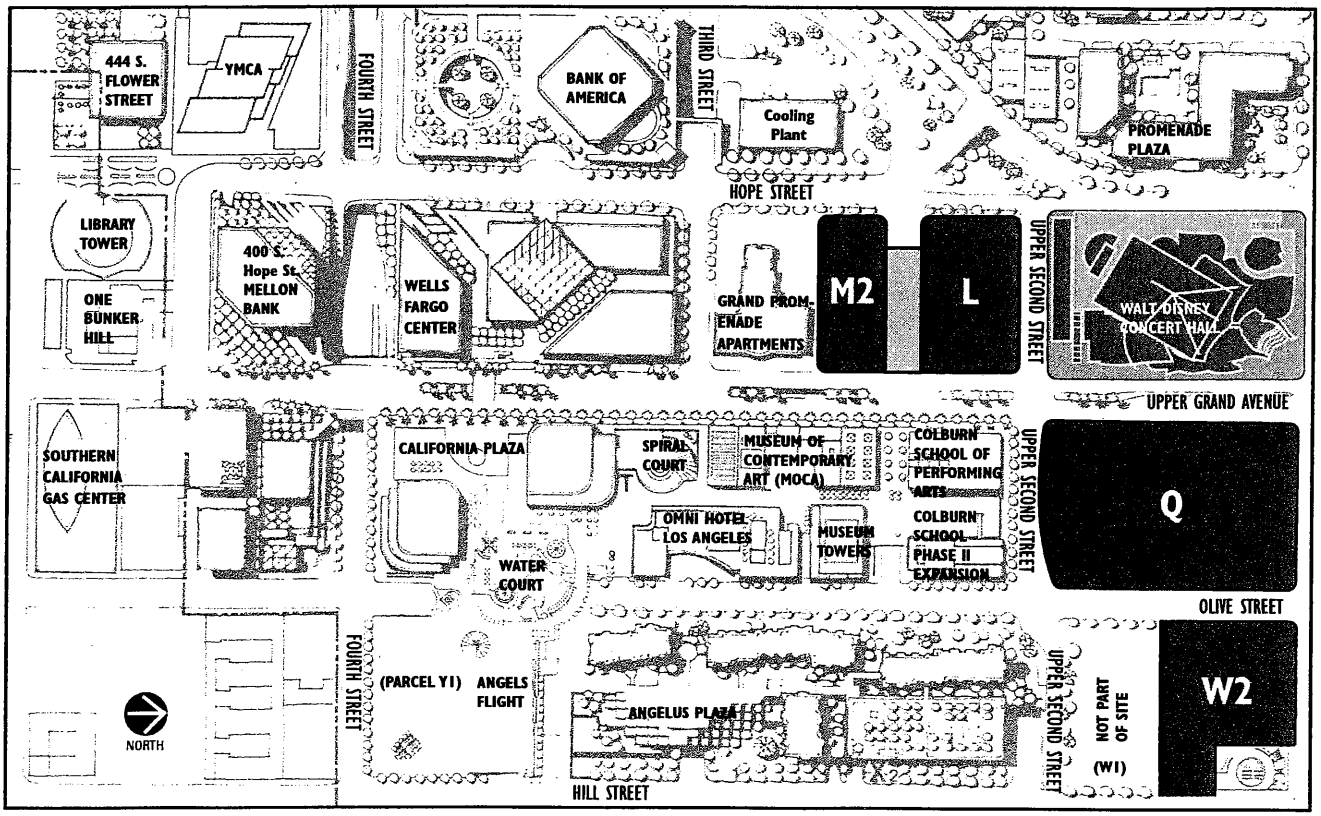
| | |
|---|---|
| Utlility Services to property line and other utility upgrades and relocations | $ 277,778 |
| Required Phase I Roadway Widenings | 1,722,221 |
| EIR Required Traffic Mitigations including ATCS upgrades and improvements at Hill & 3rd | 2,444,442 |
| Soft costs associated with producing the public improvements listed above, for example: design costs and fees; permit and inspection fees, project management costs | 555,560 |
| TOTAL: | $5,000,000 |

GRAND AVENUE PUBLIC STREETSCAPE IMPROVEMENTS BETWEEN CESAR CHAVEZ AND 5TH STREET

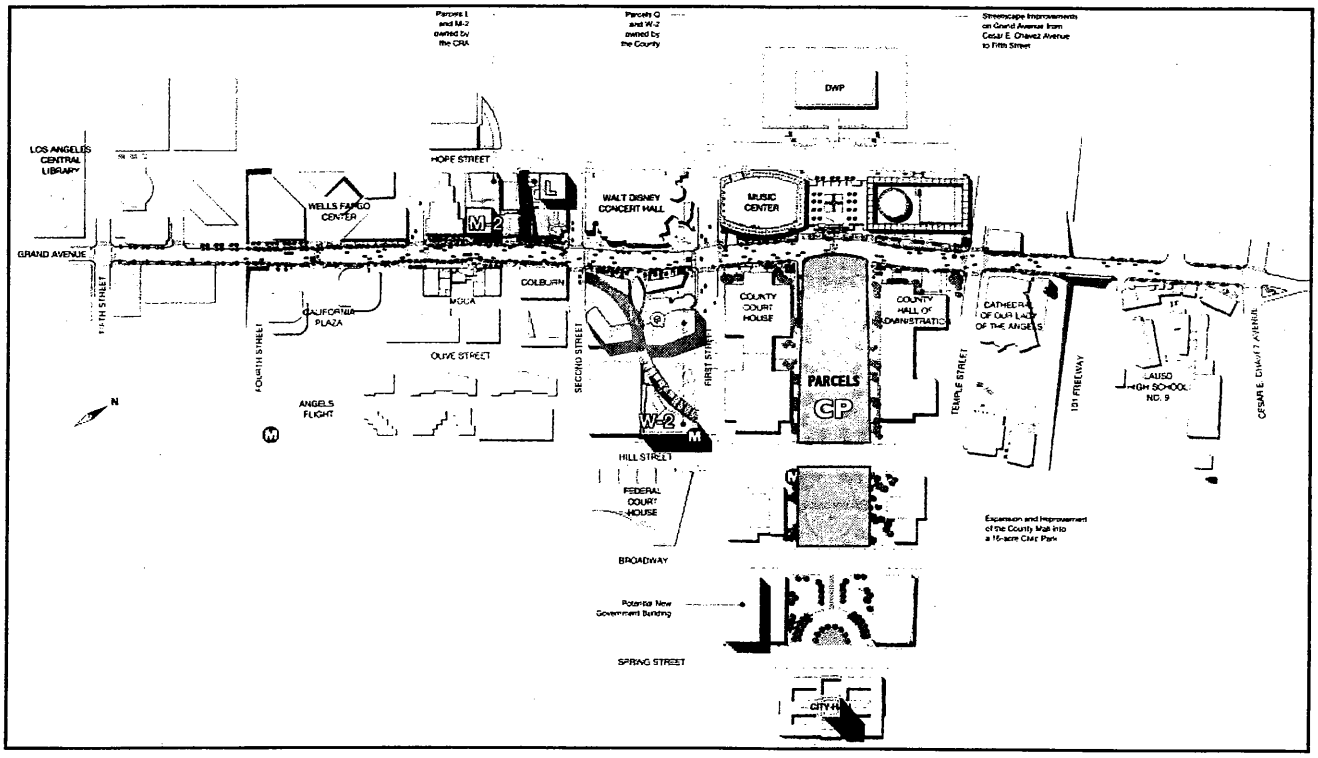
| | |
|---|---|
| Phase I: Sidewalk widening, additional landscaping, paving systems, benches, trash receptacles, street graphics and street and walkway lighting. | $1,000,000 |
| Phase II: Sidewalk widening, additional landscaping, paving systems, benches, trash receptacles, street graphics and street and walkway lighting. | 1,000,000 |
| TOTAL: | $2,000,000 |

## CIVIC CENTER PARK IMPROVEMENTS

| | | | |
|---|---|---|---|
| Initial Park Budget | | | |
| **Total Park Budget $50,970,000** | | | |
| **I. Construction Costs** | | | **$37,850,000** |
| | Demolition, Infrastructure, New Construction, Finishes, Landscape, Artworks, Escalation, Contingency, General Conditions | | |
| **II. Soft Costs** | | | |
| | A) Program/Outreach/Planning | | |
| | Business Plan, Program,Outreach, Designers, Presentation Materials, Reimbursables | | $680,000 |
| | B) Due Diligence and Technical Support | | |
| | Structural, Parking, Civil, Environmental, Geotech, Traffic and Estimating Consultants | | $170,000 |
| | C) Park Design and Engineering | | |
| | Architects, Landscape Architects, MEP, Structural, Civil, Lighting, Acoustic, Life Safety, Parking, ADA, Art and Other Consultants | | $4,420,000 |
| | D) Project Management | | |
| | Design Management, at cost | | $735,000 |
| | Construction Management, at cost | | $735,000 |
| | E) Other | | |
| | Testing, Inspection, Legal, Presentation Materials, Reimbursables, Contingency | | $1,745,000 |
| | | Subtotal | **$8,485,000** |
| **III. Overall Project Contingency** | | | **$4,000,000** |
| **IV. Program Implementation** | | | |
| | Final Program, Formation of Operating & Management Entity, Final Business Plan, Office Startup, Ground breaking & Opening | | **$635,000** |
| | | **TOTAL** | **$50,970,000** |

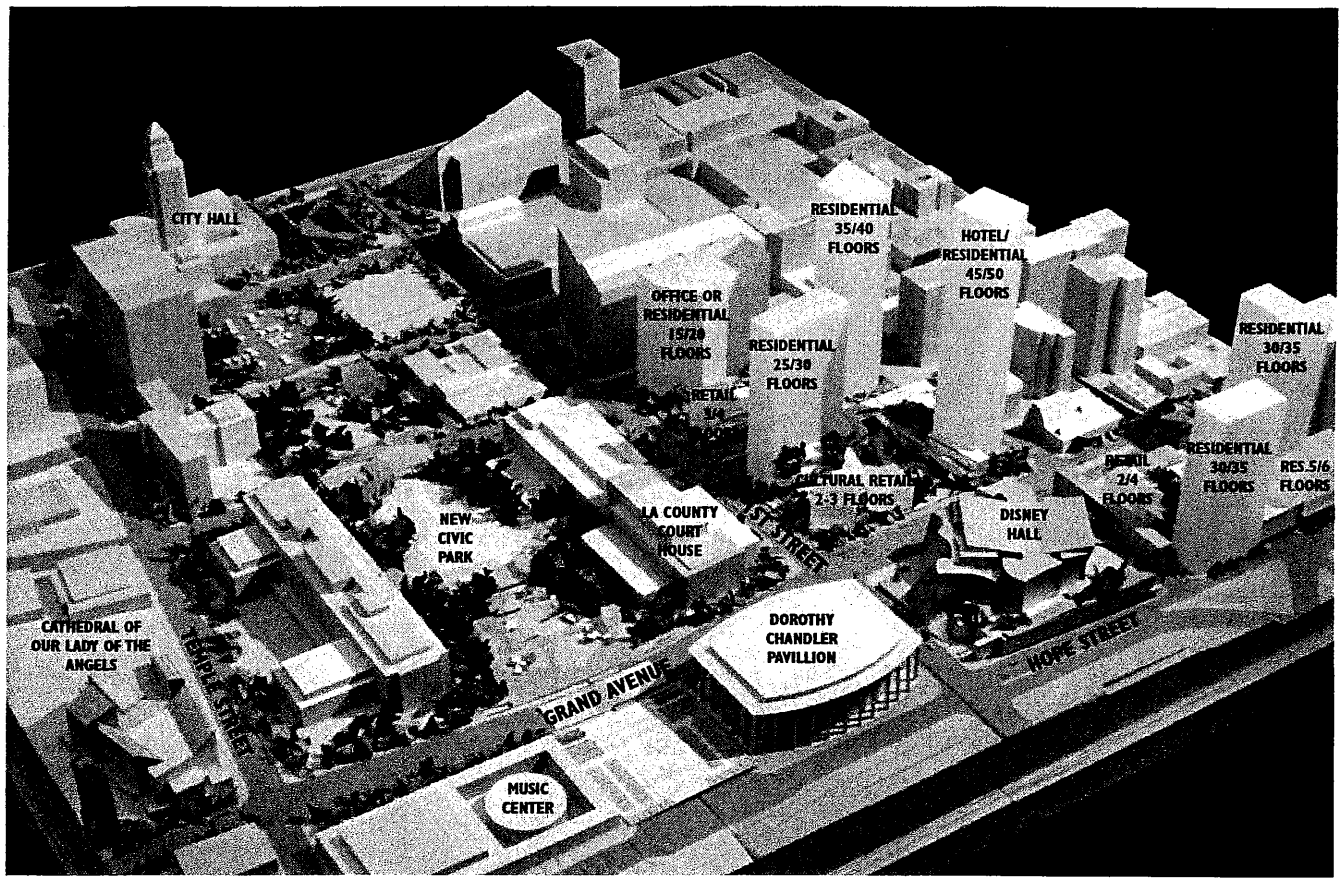



**Location Map**

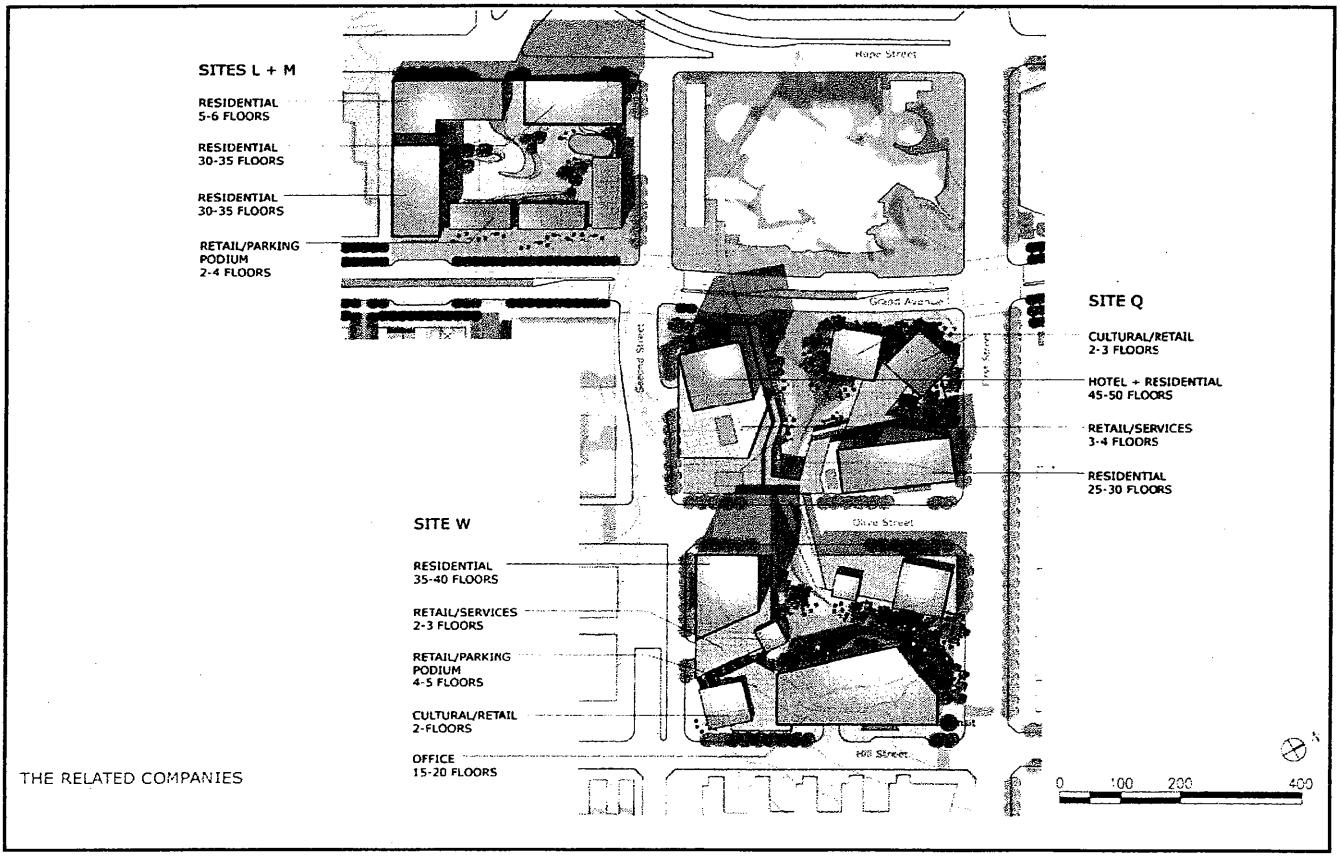



**Plan of the Grand Avenue Development Guidelines**

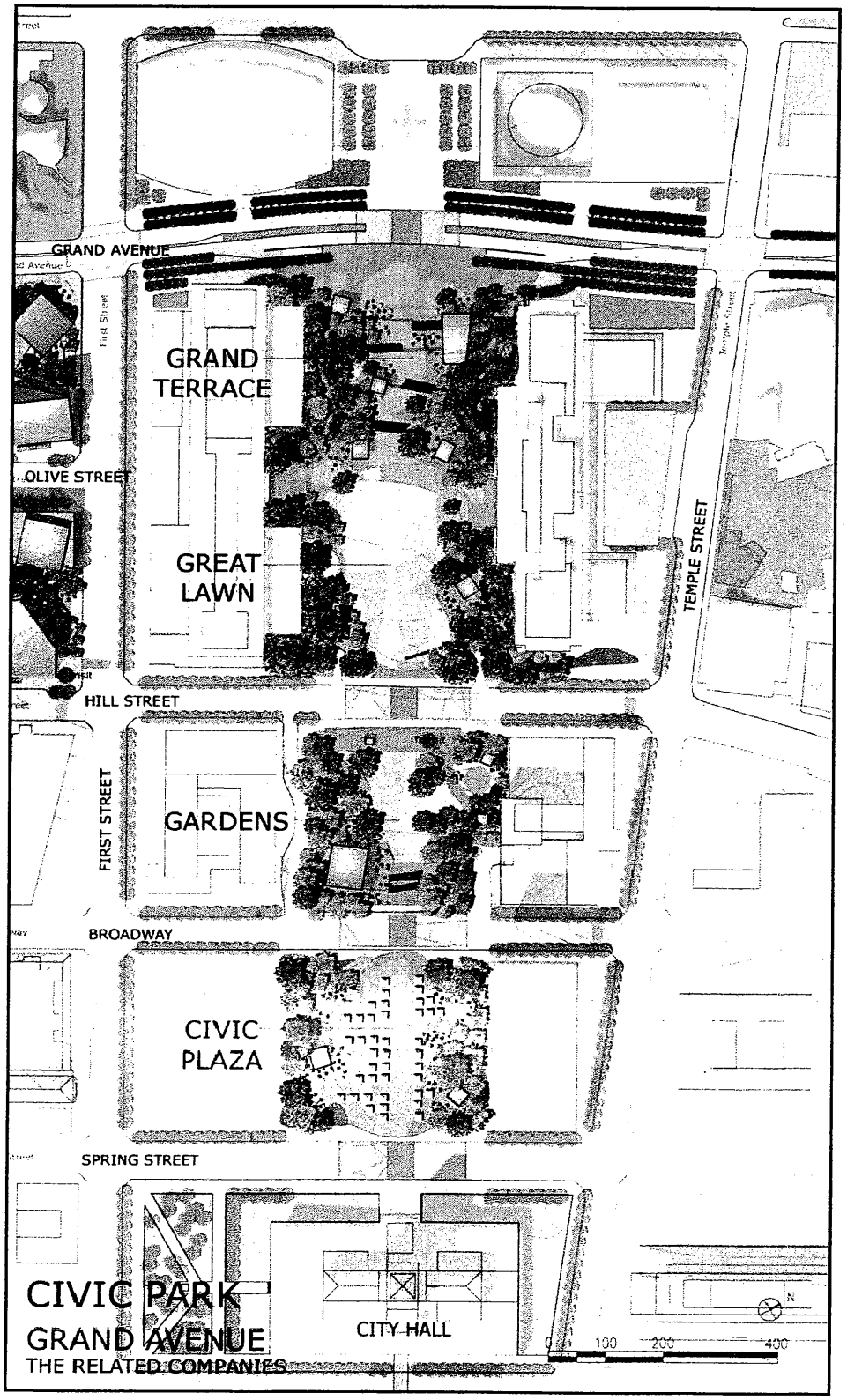
**Bunker Hill** Redevelopment Project **Grand Avenue Development** CRA/LA




3-D Site Plan




**Site Plan and Development Parcels**




**Site Plan of Civic Park**

**TABLE 9: SCOPE OF DEVELOPMENT WITH COUNTY OFFICE BUILDING OPTION**

| Description | Parcel Q | Parcels L & M-2 | Parcels W-1 & W-2 | Total |
|---|---|---|---|---|
| Residential | 632,937 sq. ft. | 829,330 sq. ft | 692,733 sq. ft. | 2,155,000 sq. ft. |
| Retail | 284,000 sq. ft. | 101,000.sq. ft. | 64,000 sq. ft. | 449,000 sq. ft. |
| Hotel | 315,000 sq. ft. | -- | -- | 315,000 sq, ft. |
| Office | -- | -- | 681,000 sq. ft. | 681,000 sq. ft. |
| **Total** | **1,231,937 sq. ft.** | **930,330 sq. ft.** | **1,437,733 sq. ft.** | **3,600,000 sq. ft.** |
| Residential Units | 500 units | 850 units | 710 units | 2,060 units |
| Affordable Units | 100 units | 170 units | 142 units | 412 units |
| Hotel Rooms | 275 Keys | -- | -- | -- |
| Parking | 1,510 spaces | 1,570 spaces | 1,955 spaces | 5,035 spaces |

**TABLE 10: SCOPE OF DEVELOPMENT WITH ADDITIONAL RESIDENTIAL DEVELOPMENT OPTION**

| Description | Parcel Q | Parcels L & M-2 | Parcels W-1 & W-2 | Total |
|---|---|---|---|---|
| Residential | 632,937 sq. ft. | 829,330 sq. ft | 1,278,333 sq. ft. | 2,836,000 sq. ft. |
| Retail | 284,000 sq. ft. | 101,000.sq. ft. | 64,000 sq. ft. | 449,000 sq. ft. |
| Hotel | 315,000 sq. ft. | -- | -- | 315,000 sq, ft. |
| Office | -- | -- | -- | -- |
| **Total** | **1,231,937 sq. ft.** | **930,330 sq. ft.** | **1,342,333 sq. ft.** | **3,600,000 sq. ft.** |
| Residential Units | 500 units | 850 units | 1310 units | 2,660 units |
| Affordable Units | 100 units | 170 units | 262 units | 532 units |
| Hotel Rooms | 275 Keys | -- | -- | -- |
| Parking | 1,510 spaces | 1,570 spaces | 2,175 spaces | 5,255 spaces |

## TABLE 7: OVERALL SCOPE OF DEVELOPMENT

| SCOPE OF DEVELOPMENT | IMPLEMENTATION PLAN | DDA |
|---|---|---|
| Hotel Rooms | 225 to 275 (4 Star) | 275 (5 Star) |
| Market Rate Units | 2,100 to 2,600 * | 2,060 to 2,660 * |
| Affordable Units | 420 to 520 * | 412 to 532 * |
| Office | Up to 681,000 sf * | No change |
| Retail | 350,000 to 400,000 sf | 449,000 sf |
| Parking | 4,800 to 5,500 * | 5,035 to 5,255 * |
| Affordability | 20% of total;<br>half at 80%, half at 50% AMI | 20% of total; all affordable rental units at 60% AMI or below **; affordable for-sale units to remain at same affordability levels |
| Total Project Costs | $1.55 billion | $2.05 billion<br>(including Parcel W-1) |

** Depending upon exercise of County Office Building Option on Parcel W-2*
*** The Developer will be seeking 4% tax credits for the affordable rental units in Phase I, in which case all of the units will be at or below 60% of AMI.*

## TABLE 8: PHASE I SCOPE OF DEVELOPMENT

| SCOPE OF DEVELOPMENT | IMPLEMENTATION PLAN | DDA |
|---|---|---|
| Hotel Rooms | 225 to 275 (4 Star) | 275 (5 Star) |
| Market Rate Units | 350 | 400 |
| Affordable Rental Units | 88 | 100 |
| Retail | 200,000 to 300,000 sf | 284,000 sf GBA |
| Parking – Residential | 650 | 755 |
| Parking – Public<br>(Including Hotel) | 1,113 | 745-755 |
| Affordability | 20% of total; all at<br>50% AMI or below | 20% of total; 35% at 35% AMI, 65% at 50% AMI |
| Total Phase I Project Costs | $637 million | $775 million |

**TABLE 11: SCHEDULE OF DEVELOPMENT**

| SCHEDULE | IMPLEMENTATION PLAN | DDA |
|---|---|---|
| Phase I Start | December 1, 2006 | October 1, 2007 |
| Phase I Complete | November 1, 2009 | July 2011 (45 months from commencement) |
| Phase II Rent Paid | 45 months after DDA is approved, subject to one year extension | November 2011 (no change) |
| Phase II Construction | 15 months after rent is paid | March 2013 (no change) |
| Phase II Completion | Within 30 months of commencement | August 30, 2015 (no change) |
| Phase III Rent Paid | 60 months after DDA is approved, subject to one year extension | March 1, 2012 (no change) * |
| Phase III Construction | 24 months after rent paid | March 1, 2014 (no change) ** |
| Phase III Completion | Within 45 months of commencement | December 1, 2018 (no change) |
| Park Construction | Phase I | No change |
| County Office Building | Not addressed | August 8, 2007- deadline for County option |

* Developer in negotiations to modify this date.
** Developer has right to accelerate construction of Phase III to coincide with Phase II.

## TABLE 12: PHASE I AFFORDABLE HOUSING UNIT/INCOME MIX

*ASSUMING 4% LOW INCOME HOUSING TAX CREDITS AND MULTIFAMILY HOUSING PROGRAM (MHP) FUNDS*

| TCAC | 1-BR Units | | | 3-BR Units | | | Total # of Units |
|---|---|---|---|---|---|---|---|
| | # of Units | Rent for 1-BR unit | HCD Affordability | # of Units | Rent for 3-BR unit | HCD Affordability | |
| **30%** | - | $389 | Very Low | - | $540 | Very Low | - |
| **35%** | 21 | $454 | Very Low | 14 | $630 | Very Low | 35 |
| **40%** | - | $519 | Very Low | - | $720 | Low Income | - |
| **50%** | 48 | $649 | Low Income | 16 | $900 | Low Income | 64 |
| **60%** | - | $779 | Low Income | - | $1,080 | Low Income | - |
| **MGR** | 1 | MRKT | N/A | - | N/A | N/A | 1 |
| | 70 | | | 30 | | | **100** |

ATTACHMENT G - Summary of Lease Acquisition Fees and Incentive Rents

**TABLE 13: LEASE ACQUISITION FEES**

| LEASE ACQUISITION FEES | | |
|---|---|---|
| **Financial Terms** | **Implementation Plan** | **DDA** |
| Formula | $75K/condo, $40/gla retail, $35k/hotel room, $20K per market apt (with CPI adjustments) | No change |
| Retail Anchor Exception | No base rent for defined anchor up to 40% phase 1 retail, 25% future phases | No change |
| Anchor Tenant | Minimum 15 year lease, 10,000 sf size minimums | Same, with exception that anchors on level 3 may be > 5,000 sf |
| Projected Phase I Leasehold Acquisition Fee | $41 million | $44.78 million[1] |
| Deposit for Phase II Leasehold Acquisition Fee | $9 million | $5.22 million (Balance of $50 million minus Phase I Leasehold Acquisition Fee)[1] |

**TABLE 14: INCENTIVE RENTS**

| INCENTIVE RENTS | | |
|---|---|---|
| **Financial Terms** | **Implementation Plan** | **DDA** |
| Hotel | 2% Gross room revenues after $200 Rev PAR is reached (escalated) | 2% Gross room revenues after $320 Rev PAR is reached (escalated)[2] until year 11 at which point the Rev PAR break point is zero |
| Projected Incentive Rent Year | Year 4 | Year 3[3] |
| Residential Condominiums | 5% sales proceeds above $575 psf | 5% sales proceeds above $700 psf (T2) or $800 psf (T1); or actual direct and indirect development costs, whichever is less for each condominium unit sold [4] |
| Retail | 2% gross income beginning in year 4 | No change |
| Apartments | 2% gross income above $40/psf/yr, 2.5% above 45, 5% above $50 | No change |

1. Adjusted due to an increase in retail space and market rate condominium units to be sold as part of Phase I.
2. Adjusted from $200 to $320 due to increased construction costs and change from a 4-star to a 5-star luxury hotel.
3. Accelerated because of enhanced room rates from 4 star to 5 star.
4. Adjusted for substantial cost increase in demolition, excavation and construction related to the high-rise construction. The ultimate strike rate (the estimated breakeven point for construction) to determine incentive rents to be paid to the Authority will be calculated once all development and construction costs are accounted for by the Developer.

An illustration of the leasehold acquisition fees by phase and use is summarized below (assuming all market rate housing will be built as condominiums and the Additional Residential Development Option is exercised):

**TABLE 15: LEASEHOLD ACQUISITION FEE BY PHASE**

| Source | Phase I | Phase II | Phase III | Total |
|---|---|---|---|---|
| Condominiums | $30,000,000 | $51,000,000 | $48,826,000 | $129,826,000 |
| Rental Units | $0 | $0 | $0 | $0 |
| Affordable Units | $0 | $0 | $0 | $0 |
| Hotel | $9,625,000 | $0 | $0 | $9,625,000 |
| Anchor Tenants | $0 | $0 | $0 | $0 |
| Non-Anchor Tenants | $5,155,000 | $3,000,000 | $932,000 | $9,087,000 |
| **Total** | **$44,780,000** | **$54,000,000** | **$49,758,000** | **$148,538,000** |

# Grand Avenue Project
# Summary of Community Benefits

**ATTACHMENT H**

| | | |
|---|---|---|
| **HOUSING** | | |
| Affordable Housing | 20% of total housing units to be set aside as affordable. All affordable rental units at Lower Income (60% AMI) level or below. Half of affordable for-sale units at Low Income (80% AMI) level, other half at Very Low Income (50% AMI) level. All affordable housing to be provided on-site and restricted for a period of 45 years for ownership units and 55 years for rental units. | Article 7, Section 707 |
| | Up to 532 affordable units for all phases assuming maximum residential buildout (Phase I – 100 units; Phase II – 170 units; Phase III – 262 units). | Exhibit "A" |
| | Phase I (Parcel Q) to include 100 units of affordable rental housing, with 35% at Extremely Low Income (35% AMI) and 65% at Very Low Income (50% AMI or below) levels. | Article 7, Section 707 |
| | Note: The Developer's obligation to provide affordable housing in future phases is contingent upon the ability of the CRA or other governmental source to provide gap financing at $100,000 per rental unit and $200,000 per for-sale unit, escalated per the Consumer Price Index (CPI). | Article 3, Section 301(3) |
| **PERMANENT SUPPORTIVE HOUSING** | | |
| Revolving Loan Program | Developer to provide $750,000 to $1,500,000 in funds available for a period of 10 years through a revolving loan program for the financing of permanent supportive housing projects. As currently proposed, the Developer will provide $1,500,000 until the initial 3 predevelopment loans have been repaid, after which the Developer may reduce the total amount available to $750,000 for the balance of ten years. Terms and conditions: maximum $750,000 individual loan amount, 2-year term, principal only (no interest charged). | Details to be finalized |
| **JOBS** | | |
| Job Creation | Projected Number of Direct and Indirect Jobs<br>Construction / Permanent / Total<br>Phase I: 9,900 / 3,100 / 13,000<br>Phases II and III: 19,100 / 2,800 / 21,900<br>Total: 29,000 / 5,900 / 34,900<br>*Source: Los Angeles Economic Development Corporation (LAEDC)*<br>Note: These job projections include both direct and indirect employment opportunities related to the Grand Avenue Project. "Direct" jobs are construction-related jobs (i.e. engineers, surveyors, concrete truck drivers, welders, etc.) hired to build the Project. "Indirect" jobs are those sustained by the expenditures of the "direct" construction firms and the "direct" workers. | |
| | Phase I Construction Job Impact: Estimated 3,025 Full-Time Equivalent (FTE) direct construction jobs over a four-year construction period with an anticipated peak count of 1,010 direct FTE construction workers/year. (A FTE worker is defined as the equivalent of 1 worker employed in a full-time construction job for one year, or 2 workers for six months, or 3 workers for four months, and so forth.) | |
| | Phase I Permanent Job Impact: Estimated 1,800 FTE direct permanent jobs. | |
| Local Hiring | Construction Jobs: 30% local hiring goal; 10% "at-risk" hiring goal. | Exhibit "S" |
| | Permanent Jobs: 30% local low-income hiring goal; 10% "at-risk" hiring goal. | Exhibit "S" |
| | "Local Resident" defined as an individual whose primary place of residence is within 5 miles of the Project site; includes low-income individuals (as defined by California Community Redevelopment Law), "at-risk" individuals, and individuals whose primary place of residence is within high unemployment Census tracts within LA County. | Exhibit "S" |
| | "Local Low-Income Resident" defined as a low income individual (as defined by California Community Redevelopment Law) whose primary place of residence is within 5 miles of the Project site; includes "at-risk individuals". | Exhibit "S" |
| | "At-Risk Individual" defined as a low income individual (as defined by California Community Redevelopment Law) with one of the following barriers to employment: is homeless, lack of English language and literacy skills, lack of a GED or high school diploma, is a single parent or a welfare recipient, history of involvement with criminal justice system, significant gaps in work history. | Exhibit "S" |

# Grand Avenue Project
## Summary of Community Benefits

| | | |
|---|---|---|
| **JOBS** *(continued)* | | |
| Local Hiring *(continued)* | Hiring preference given in following order: (a) zip codes with high unemployment (i.e. unemployment rate exceeds 14% as reported by CA Employment Development Dept.) within 5 miles of the Project site, (b) area within 1.5 miles of the Project site, (c) area within 5 miles of the Project site, (d) zip codes with high unemployment within LA County. | Exhibit "S" |
| | 50% local apprentice goal applies to construction workforce; Construction employers required to pay at least 50% of union sponsorship fees for local low-income residents. | Exhibit "S" |
| | Negotiations with the Developer and the unions are currently on-going to set aside half of the entry-level construction trade apprenticeships for local low-income residents. | Pending |
| Job Training | CRA to hire Jobs Coordinator and partner with community-based organizations and WorkSource Centers to recruit, train, and place local and local low income residents in Project-related jobs (both construction and permanent). | Exhibit "S" |
| | Includes $500,000 Developer contribution towards first source / local hiring and job training programs. | Article 7, Section 710 |
| | All future Project-related incentive rents, less any Project-related obligation per the DDA, received by the CRA will be earmarked to fund specialized construction and permanent job training programs for the Grand Avenue Project. For Phase I, the CRA has committed $500,000, plus up to $850,000 on a dollar-for-dollar matching basis for any other funding source. | Details to be finalized |
| In Kind Job Training | Construction employers will provide on-the-job apprenticeship training for new construction hires per Developer's agreement with General Contractor. Estimated $4 million of general construction contract is earmarked for Phase I construction job training. | |
| First Source Hiring Policy | First Source hiring procedures will require Project-related employers to give local residents early notice and first opportunity to apply for permanent jobs. | Exhibit "S" |
| Union Jobs | Construction: All construction jobs will be union; Developer is working to execute Project Labor Agreements with Building Trades and Carpenters Unions. | Pending |
| | Hotel: Developer is working to execute a neutrality agreement with HERE Local 11. | Pending |
| | Maintenance and Security: Developer in discussions with SEIU regarding collective bargaining agreements for maintenance and security. | Pending |
| Prevailing Wage | All construction jobs will be paid at Prevailing or Union wages, subject to either the Project Labor Agreement or the CRA's Prevailing Wage Policy. | |
| Living Wage | All permanent jobs subject to CRA's Living Wage Policy, including jobs provided by Project tenants, i.e. restaurants, grocery store and retail outlets. | Article 7, Section 706; Exhibit "O" |
| **OPEN SPACE** | | |
| Civic Park | 16-acre park to be provided in Phase I by renovating and expanding County Mall. | Civic Park Design Agreement |
| | $50 million funded by Phase I and a portion of Phase II ground lease payments. | |
| | Developer responsible for project management and delivery of park at cost with no profit or developer's fee. | |
| On-Site Public Space | Phase I (Parcel Q) to include a public plaza at the Grand Avenue level; elevators and escalators providing public pedestrian access from public parking garage levels and Metro Red Line station at 1st/Hill to the public plaza; and other public space amenities. | Schedule 3A |
| **ART** | | |
| Public Art | Project subject to CRA's Art Policy. Developer required to provide 1% of total Project development costs, excluding land, off-site improvements and affordable housing units, to a public art program. The Phase I art fee is estimated at $3 million. | Exhibit "N" |

# Grand Avenue Project
## Summary of Community Benefits

| | | |
|---|---|---|
| **SUSTAINABLE DEVELOPMENT** | | |
| Sustainable Development | Project must incorporate "sustainable" building methodologies and technologies. Sustainable technologies and methodologies could include, but are not limited to, the conservation of water through the use of water saving fixtures, drought resistant plants to reduce the amount of watering, installation of double pane windows, installation of 1.5 gallon toilets in each dwelling unit, insulation on hot water piping at exposed areas, and the use of forced heating systems as established by the CA State Title 24 energy efficiency guidelines. | Exhibit "A" |
| LEED Certification | Developer will strive towards certifying the Project in the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, a nationally accepted benchmark for the design, construction, and operation of high performance green buildings. | Pending |
| **OTHER** | | |
| Equal Benefits Policy | Project subject to CRA's Equal Benefits Policy. During the performance of DDA, the Developer/Contractor will provide equal benefits to its employees with spouses and its employees with domestic partners. | Article 7, Section 709; Exhibit "P" |
| Service Contractor Retention Policy | Project subject to CRA's Service Contractor Retention Policy. During the performance of the DDA, the Developer and its subcontractors and consultants are required to make the effort to retain service contractors when a service contract is terminated with one provider and awarded to another. | Article 7, Sections 706 & 709; Exhibits "O" & "P" |
| Minority/ Women/Other-Owned Business Enterprise Utilization | The Developer and its subcontractors and consultants shall make good faith efforts to provide outreach to Minority-owned, Women-owned, and other business enterprises. | Article 7, Section 703; Exhibit "P" |
| Non-Discrimination Policy | Project subject to CRA's Non-Discrimination Policy. During the performance of the DDA, the Developer and its subcontractors and consultants will not discriminate against any employee or applicant for employment because of race, color, religion, creed, national origin, ancestry, disability, medical condition, age, marital status, domestic partner status, sex, sexual preference/orientation, Acquired Immune Deficiency Syndrome (AIDS) – acquired or perceived, or retaliation for having filed a discrimination complaint. | Article 7, Section 709; Exhibit "P" |
| Contractor Responsibility Policy | Project subject to CRA's Contractor Responsibility Policy. Unless otherwise exempt in accordance with the provisions of the Agency's Policy, this DDA is subject to the provisions of the Contractor Responsibility Policy (CRP), which requires the Contractor to update its responses to the responsibility questionnaire within 30 calendar days after any change to the responses previously provided if such change would affect Contractor's fitness and ability to continue performing the Agreement. | Article 7, Sections 706 & 709; Exhibits "O" & "P" |
| Community Oversight | CRA to form and appoint a Project-specific advisory committee that will meet quarterly with the CRA's Jobs Coordinator to help design the uses of job training funds, receive compliance reports regarding local hiring requirements, and provide input to the Agency relating to issues of workforce development, parks, and open space. | Details to be finalized |

**EXHIBIT S**
**(Part 1)**

# LOCAL HIRING RESPONSIBILITIES OF CONSTRUCTION EMPLOYERS WORKING ON THE GRAND AVENUE PROJECT

**I. Purpose.** This document sets forth the responsibilities of Construction Employers related to the hiring of Local Residents, including Local Low Income Residents, in connection with work on the Grand Avenue Project.

**II. Definitions.**

"**Area Median Income**" ("AMI") means the area median income for the Los Angeles-Long Beach Metropolitan Statistical Area, as determined annually by the Department of Housing and Urban Development (HUD), adjusted for actual household size.

"**At-Risk Individual**" means a Lower Income Individual who has one of the following barriers to employment: is homeless; lacks English language and literacy skills; lacks a GED or high school diploma; is a single parent or a welfare recipient; has history of involvement with criminal justice system; or has significant gaps in work history.

"**Authority**" means The Los Angeles Grand Avenue Authority, a California joint powers authority, as specifically defined in the Disposition and Development Agreement.

"**City**" means the City of Los Angeles, a charter city and municipal corporation duly organized and existing under the Constitution and laws of the State of California.

"**Community Employment Area**" means the area which includes all areas within five miles of the Project.

"**Construction Employer**" means a Developer, Contractor or Subcontractor performing construction-related work on the Project that has a total cost of $250,000 or more.

"**Contractor**" means a general or prime contractor (individual, partnership, corporation, joint venture or other legal entity) awarded a contract by the Developer or the Authority for construction work at the Project.

"**Core Employee**" means an employee whose name appears on a Contractor or Construction Employer's active payroll for sixty (60) of the one hundred (100) working days before award of the contract for work on the Project.

"**CRA**" means The Community Redevelopment Agency of the City of Los Angeles, California.

"**Craft Request Form**" means the form to be used by each Construction Employer to request employees for the work on the Project.

"**Developer**" means Grand Avenue L. A., LLC, a Delaware limited liability company, as specifically defined in the Disposition and Development Agreement. Whenever the term "Developer" is used herein, such term shall include any permitted nominee, transferee or partner, assignee or successor in interest of Developer as provided in the Disposition and Development Agreement.

**"Disposition and Development Agreement"** means the agreement between the Developer and the Authority relating to the development of the Project and the lease of the Project site.

**"High Unemployment Zip Code"** means one of the following zip codes: 90012, 90017, 90071, 90013, 90014, 90015, 90021, 90018, 90062, 90037, 90011, 90003, 90001, 90033; provided these zip codes contain all of a portion of at least one census tract located within the County of Los Angeles with a rate of unemployment in excess of fourteen percent (14%) as reported by the State of California Employment Development Department.

**"Jobs Coordinator"** means a coordinator designated by the CRA to facilitate implementation of the requirements of this Exhibit S.

**"Local Low-Income Resident"** means: (a) a Lower Income Individual whose primary residence or place of employment is in the Community Employment Area; or (b) an At-Risk Individual whose primary place of residence is within the Community Employment Area.

**"Local Resident"** means: (a) an individual whose primary place of residence is within the Community Employment Area; (b) any Local Low-Income Resident; (c) any At-Risk Individual whose primary place of residence is within the Community Employment Area; or (d) an individual whose primary place of residence is within a High Unemployment Zip Code.

**"Lower Income Individual"** means an individual whose household income qualifies as Low under the definitions as set forth in California Health & Safety Code §§ 50079.5.

**"Project"** means the project commonly known as the Grand Avenue Project consisting of a mixed use development project located in the vicinity of Grand Avenue and Upper Second Street in downtown Los Angeles, California and undertaken by the Developer pursuant to the Disposition and Development Agreement, as specifically defined in the Disposition and Development Agreement.

**"Subcontractor"** means any entity that contracts with a Contractor to perform construction work on the Project, and any subcontractors of such an entity who perform construction work on the Project.

**III. Inclusion of Local Hiring Terms in Contracts and Leases.** Each Construction Employer shall include this Exhibit S as a material term of any agreement between the

Construction Employer and the Developer or any Contractor or any Subcontractor or the Grand Avenue Authority.

## IV. Local Hiring Terms.

### A. Goals.

1. **Local Hiring Goal.** Construction Employers will have a goal that at least thirty percent (30%) of the total construction workforce will consist of Local Residents, as measured by work hours for each construction trade craft,. This Local Residents goal includes a goal that At-Risk Individuals whose primary place of residence is within the Community Employment Area will compose not less than ten percent (10%) total of the construction workforce as measured by work hours, i.e. At-Risk Individuals whose primary place of residence is within the Community Employment Area should make up one third (1/3) of the Local Residents goal set forth in this Section IV.A.1. Construction Employers will continue to use good faith efforts to hire At-Risk Individuals after the ten percent (10%) At-Risk Individual hiring goal has been met. Preference will be given to Local Residents in the following order: (i) those living within a High Unemployment Zip Code located within the Community Employment Area; (ii) those living within one and one-half (1.5) miles of the Project site; (iii) those living in the Community Employment Area; and (iv) all other Local Residents. The provisions of this Exhibit S do not require the Developer or its contractors to hire any person, who does not have the experience and ability and, where necessary, the appropriate trade union affiliation, to qualify such person for such job.

2. **Local Apprentice Goal.** Construction Employers will have a goal of at least fifty percent (50%) of the total apprentice construction workforce, as measured by work hours for each construction trade craft, will consist of Local Residents. Apprentice hours may be counted toward the overall local hiring goal in Section IV.A.1. Preference will be given to Local Residents in the following order: (i) those living within a High Unemployment Zip Code located within the Community Employment Area; (ii) those living within one and one-half (1.5) miles of the Project site; (iii) those living in the Community Employment Area; and (iv) all other Local Residents.

### B. Requirements.

1. **Maximizing Apprentices.** Construction Employers will utilize the maximum number of apprentices allowed by law.

2. **Coordination with Unions.** The unions shall be the primary source of all craft labor employed on the Project site. Construction Employers will inform any union with whom the Construction Employer has an agreement that the

Construction Employer is required to give priority to Local Residents and Local Low-Income Residents and will promptly notify the Jobs Coordinator of any union that fails or refuses to refer Local Residents or Local Low-Income Residents for jobs on the Project. In the event that a Construction Employer has its own core workforce and wishes to employ such Core Employees to perform work on the Project, the number of Core Employees shall be governed by the following procedures. The Construction Employer may hire one (1) Core Employee for each Local Resident hired by the Construction Employer up to a maximum of five (5) Core Employees. Thereafter, the Construction Employer shall use the Job Coordinator/union referral process for selecting and hiring employees for the work on the Project. If the Jobs Coordinator or union is unable to fill the request of a Construction Employer within a forty eight (48) hour period, the Construction Employer shall be free to obtain work persons from any source.

3. **Hiring Preference**. Each Construction Employer will give qualified Local Residents first priority for hiring on available jobs in any project covered by the terms of this Exhibit S, subject to the priorities set forth in Section IV.A.(i).

4. **Notification.** Each Construction Employer will notify the Jobs Coordinator whenever skilled or unskilled labor is needed on the job site.

5. **Support for Local Low-Income Apprentices.**

a. **Sponsorship Fees.** Each Construction Employer will cover at least 50% of the sponsorship fees for any Local Low-Income Resident hired as an apprentice by that Construction Employer.

b. **Sponsorship of Entry Level Apprentices**. Each Construction Employer will sponsor any qualified Local Low-Income Resident referred by the Jobs Coordinator as an Entry Level Apprentice and will indicate this by sending a letter (or form, as appropriate) to the relevant union or apprenticeship program expressing a commitment to sponsor and to provide on-the-job training for the Local Low-Income Resident in question.

6. **On-the-Job Training**

a. **On-the-Job Training Credit Toward Hiring Goal.** Each Construction Employer who provides on-the-job training in accordance with the requirements of Subsection IV.B.6.b. below will receive a credit toward the hiring goal in Subsections IV.A.1 of this Exhibit S equal to twice the number of hours worked by each Local Low-Income Resident receiving such training. No Construction Employer may receive such credit, however, for training provided for a task or position that does not reasonably require such training.

b. **Requirements to Receive On-the –Job Credit.** In order to receive credit described in Subsection IV.B.6.a., a Construction Employer must meet the following requirements. The requirements of this Subsection IV.B.6.b. are not otherwise mandatory.

i. **Basic Requirement.** Each Construction Employer will make appropriate on-the-job training available to Local Low-Income Residents hired in connection with the requirements of this Exhibit S.

ii. **Training Plan**. Each Construction Employer will adopt a training plan that describes the on-the-job training to be provided in each job category to Local Low-Income Residents hired for that job category.

iii. **Duration**. On-the-job training will be offered for a minimum of six (6) months or the duration of employment, whichever is less, to each Local Low-Income Resident hired by a Construction Employer, in order to enable Local Low-Income Residents to hold positions for which they might not otherwise qualify.

7. **Hiring Liaison.** Each Construction Employer will designate a hiring liaison (the "Hiring Liaison") before commencing operations covered by this Exhibit S to act as a conduit between the Construction Employer and the Jobs Coordinator. This Hiring Liaison will be responsible for providing to the Jobs Coordinator and the Developer all necessary documentation throughout the duration of the Project.

C. **Duration**. Each Construction Employer will abide by the terms of this Exhibit S for the lesser of (a) ten (10) years or (b) the duration of the term of the agreement that includes this Exhibit S.

## V. Monitoring and Enforcement

A. **Review of Compliance.** Construction Employers will keep records of their compliance with this Exhibit S, including all Craft Request Forms submitted to unions and payroll records, and make such records available to the Developer, the Jobs Coordinator, CRA or the Authority upon request. The Authority or the CRA will make a written finding as to each Construction Employer's compliance with the requirements of Exhibit S.

B. **Non-Compliance, Opportunity to Cure.**
If, during any review of compliance, the Authority or the CRA finds that a Construction Employer has not complied with any of the requirements of this Exhibit S, the Authority or CRA shall immediately issue to the Developer and Contractor/Construction Employer a written finding of non-compliance and provide a

sixty (60) day opportunity to cure. In order to cure and to avoid the penalties set forth below, the Developer must make a detailed showing to the Authority or the CRA that:

1. the non-compliant Construction Employer has made diligent use of all reasonable and necessary methods to meet each of the requirements of Section IV.B. of this Exhibit S such as submission of Craft Request Forms to the unions, submission of a request to the Jobs Coordinator, outreach programs, advertising, training, distribution of advertising and notices, job fairs programs; or

    a. the non-compliant Construction Employer has met the Goals set out in Sec. IV.A of this Exhibit S; or

    b. the Developer or another compliant Construction Employer with whom the Developer has a contract for work on the Project, having already met the goals in Section IV.A, has, following the initial finding of non-compliance:

    c. made additional new hires of Local Residents in an amount equal to the number of Local Residents by which the non-compliant Construction Employer fell short of the 30% local hiring goal set out in Section IV.A.1.; or

    d. made additional new hires of Local Residents in an amount equal to the number of Local Residents by which the non-compliant Construction Employer fell short of the 50% Local Apprentice Goal set out in Section IV.A.2.

2. in the event the Developer disputes the finding of the Authority or CRA that the Developer has not made the showing set forth in Section V.B. above, the Developer may invoke the Dispute Resolution procedures outlined in Article 17 of the DDA.

The Developer may rely only once on each additional hire made by already compliant Construction Employers in its effort to avoid penalties under this Section V.B..

C. **Penalties for Non-Compliance.**
If, prior to the end of the sixty (60) day cure period described in Section V.B. above, the Developer has not made the showing set forth in Section V.B., the Authority or CRA may require the Developer to pay to the Authority or the CRA an amount equal to fifty dollars ($50.00) multiplied by the sum of the number (as calculated on hours worked based on an eight (8) hour day for a full-time position) of Local Residents short of the thirty percent (30%) local hiring goal set out in Section IV.A.1 and the number of Local Low Income Residents short of the Local Apprentice Goal set out in Section IV.A.2., per calendar day following the initial finding of non-compliance. The Developer will continue to pay this penalty until:

1. the Developer has made the showing set forth in Section V.B.i, V.B.ii; or V.B.iii; or

2. the Developer has filed a Notice of Completion for the Phase of the Project with County of Los Angeles.

**EXHIBIT S**
**(Part 2)**

## LOCAL HIRING RESPONSIBILITIES OF PERMANENT EMPLOYERS ON THE GRAND AVENUE PROJECT

I. **Purpose.** This document sets forth the responsibilities of Permanent Employers at the Grand Avenue Project related to the hiring of Local Residents, including Local Low-Income Residents.

II. **Definitions.**

"**Area Median Income**" ("AMI") means the area median income for the Los Angeles-Long Beach Metropolitan Statistical Area, as determined annually by the Department of Housing and Urban Development (HUD), adjusted for actual household size.

"**At-Risk Individual**" means a Lower Income Individual that has one of the following barriers to employment: is homeless; lack of English language and literacy skills; lack of a GED or high school diploma; is a single parent or a welfare recipient; history of involvement with criminal justice system; or significant gaps in work history.

"**Authority**" means The Los Angeles Grand Avenue Authority, a California joint powers authority, as specifically defined in the Disposition and Development Agreement.

"**City**" means the City of Los Angeles, a charter city and municipal corporation duly organized and existing under the Constitution and laws of the State of California.

"**Community Employment Area**" means the area which includes all areas within five miles of the Project.

"**CRA**" means The Community Redevelopment Agency of the City of Los Angeles, California.

"**Developer**" means the Grand Avenue L.A., LLC, a Delaware limited liability company, as specifically defined in the Disposition and Development Agreement. Whenever the term "Developer" is used herein, such term shall include any permitted nominee, transferee or partner, assignee or successor in interest of Developer as provided in the Disposition and Development Agreement.

"**Disposition and Development Agreement**" means the agreement between the Developer and the Authority relating to the development of the Project and the lease of the Project site.

"**High Unemployment Zip Code**" means one of the following zip codes: 90012, 90017, 90071, 90013, 90014, 90015, 90021, 90018, 90062, 90037, 90011, 90003, 90001, 90033; provided these zip codes contain all of a portion of at least one census tract located within the

County of Los Angeles with a rate of unemployment in excess of fourteen percent (14%) as reported by the State of California Employment Development Department.

**"Jobs Coordinator"** means a coordinator designated by the CRA to facilitate implementation of the requirements of this Exhibit S.

**"Local Employer"** means all firms with ten (10) or more employees who spend at least fifty percent (50%) of their total work hours on-site at the Project.

**"Local Low-Income Resident"** means: (a) a Lower Income Individual whose primary residence or place of employment is in the Community Employment Area; or (b) an At-Risk Individual whose primary place of residence is within the Community Employment Area.

**"Local Resident"** means: (a) an individual whose primary place of residence is within the Community Employment Area; or (b) any Local Low-Income Resident; (c) any At-Risk Individual whose primary place of residence is within the Community Employment Area; or (d) an individual whose primary place of residence is in a High Unemployment Zip Code.

**"Lower Income Individual"** means an individual whose household income qualifies as Low under the definitions as set forth in California Health & Safety Code §§ 50079.5.

**"Permanent Employer"** means a Local Employer that (a) has entered into a lease or contract with the Developer or the Authority to operate a business in the Project or (b) is also a Permanent Employer Subcontractor.

**"Permanent Employer Subcontractor"** means any Local Employer who contracts with a Permanent Employer to perform work on the Project in connection with which the Permanent Employer has a lease or contract with the Developer or the Authority.

**"Project"** means the project commonly known as the Grand Avenue Project consisting of a mixed use development project located in the vicinity of Grand Avenue and Upper Second Street in downtown Los Angeles, California and undertaken by the Developer pursuant to the Disposition and Development Agreement, as specifically defined in the Disposition and Development Agreement.

**"Recruitment Organization"** means a job recruitment organization located in the Community Employment Area including without limitation government agencies, social service providers and non-profit organizations serving the needs of Local Residents.

**"Term"** shall mean the ten (10) year period for each phase of the Project commencing on the date that the first certificate of occupancy is issued by the City of Los Angeles for such Project phase or portion of such Project phase.

**III. Inclusion of Local Hiring Terms in Contracts and Leases.** Each Permanent Employer shall include this Exhibit S as a material term of any agreement between the

Permanent Employer and (a) the Developer (b) the Authority or (c) any Permanent Employer Subcontractor.

## IV. Local Hiring Terms.

A. **Local Hiring Goal.** Throughout the Term, Permanent Employers shall have a goal that Local Low-Income Residents will make up not less than thirty percent (30%) of the workforce of each Permanent Employer, as measured by total work hours. This Local Low-Income Resident goal includes a goal that At-Risk Individuals whose primary place of residence is within the Community Employment Area will compose not less than ten percent (10%) of the total workforce of each Permanent Employer as measured by total work hours, i.e At-Risk Individuals whose primary place of residence is within the Community Employment Area should make up one third (1/3) of the Local Low-Income Residents goal set forth in this Section IV.A.1. Preference will be given to Local Low-Income Residents in the following order: (i) those living within a High Unemployment Zip Code located within the Community Employment Area; (ii)those living within one and one-half (1.5) miles of the Project site; (iii) those living in the Community Employment Area; and (iv) all other Local Low-Income Residents. The provisions of this Exhibit S do not require the Developer or a Permanent Employer to hire any person who does not have the experience and ability to qualify such person for such job.

B. **Requirements.**

1. **Preferential Notification.** Each Permanent Employer will notify the Jobs Coordinator or Recruitment Organization specified by the Jobs Coordinator of job opportunities in advance of other hiring outreach efforts and provide a description of job responsibilities and qualifications, including expectations, salary, work schedule, duration of employment, and any special requirements (e.g. language skills, drivers' licenses, etc.).

a. **Duration.** This preferential notification must be provided for a period of not less than a three (3) week period prior to commencement of the Permanent Employer's operations. After commencement of a Permanent Employer's operations, this preferential notification must be provided for at least a five (5) day period prior to the announcement of any job opportunity. Such preferential notification will take place throughout the period described in Section IV.C. below.

b. **Recruitment Organization**. Notification shall be given to the Jobs Coordinator or Recruitment Organization specified by the Jobs Coordinator. The Permanent Employer shall only be required to provide notification to the Jobs Coordinator or another entity designated by the Jobs Coordinator.

2. **Hiring Preferences.** Subject to compliance with the preferential notification procedures referred to above, all Permanent Employers may at all times consider

applicants referred or recruited through any source, and may use normal hiring practices, including interviews, to consider all referred applicants.

a. **Exclusive Initial Hiring.** When making initial hires for the commencement of the Permanent Employer's operations, the Permanent Employer will hire only Local Low-Income Residents for a three (3) week period following the notification of job opportunities described in subparagraph IV.B.1 above. During such three (3) week period Permanent Employers may hire Local Low-Income Residents recruited or referred through any source. After such period, Permanent Employers shall make good-faith efforts to hire Local Low-Income Residents, but may hire any applicant recruited or referred through any source

b. **Ongoing Exclusive Hiring**. When making hires after the commencement of operations, the Permanent Employer will hire only Local Low-Income Residents for a five (5) day period following the notification of job opportunities. During such five (5) day period Permanent Employers may hire Local Low-Income Residents recruited or referred through any source. After such period, Permanent Employers shall make good-faith efforts to hire Local Low-Income Residents, but may hire any applicant recruited or referred through any source. The Permanent Employers obligations contained in this IV.B.2.b. shall continue throughout the Term.

3. **On-the-Job Training**

a. **Credit Toward Hiring Goal.** Each Permanent Employer who provides on-the-job training in accordance with the requirements of Subsection IV.B.3.b below will receive a credit toward the hiring goal in Subsection IV.A of this Exhibit S equal to twice the number of hours worked by each Local Low-Income Resident receiving such training. No Permanent Employer may receive such credit, however, for training provided for a task or position that does not reasonably require such training.

b. **Requirements to Receive Credit.** In order to receive credit toward the hiring goal under Subsection IV.A, a Permanent Employer must meet the following requirements. The requirements of this Subsection IV.B.3.b. are not otherwise mandatory.

i. **Basic Requirement.** Each Permanent Employer will make appropriate on-the-job training available to Local Low-Income Residents hired in connection with the requirements of this Exhibit S.

ii. **Training Plan**. Each Permanent Employer will adopt a Training Plan that describes the on-the-job training to be provided in each job category to Local Low-Income Residents hired for that job category.

iii. **Duration**. On-the-job training will be offered for a minimum of six (6) months (or the duration of the employment whichever is less) to each Local Low-Income Resident hired by a Permanent Employer, in order to enable Local Low-Income Residents to hold positions for which they might not otherwise qualify.

4. **Hiring Liaison.** Each Permanent Employer will designate a hiring liaison ("Hiring Liaison") before commencing operations covered by this Exhibit S to act as a conduit between the Permanent Employer and the Jobs Coordinator. This Hiring Liaison will be responsible for providing to the Jobs Coordinator and the Developer all necessary documentation throughout the duration of the Project.

C. **Duration**. Each Permanent Employer will abide by the terms of this Exhibit S for the lesser of (a) ten (10) years from the commencement of operations, or (b) the Term.

## V. Monitoring and Enforcement

A. **Review of Compliance.** Throughout the Term, Permanent Employers will keep records of their compliance with this Exhibit S, and make such records available to the Developer, the Jobs Coordinator, the CRA or the Authority upon request. The Developer shall report to the CRA and Authority on the fifteenth ($15^{th}$) day of each quarter during the Term regarding the compliance of Permanent Employers with this Exhibit S during the previous quarter. The CRA or the Authority shall review each Developer's report of compliance by Permanent Employers. Following each review, the Authority will make a written finding as to each Permanent Employer's compliance with the requirements of this Exhibit S. The Developer may appeal a finding of non-compliance by any Permanent Employer to the CRA, which will review such an appeal.

B. **Non-Compliance, Opportunity to Cure.**

If, during any review of compliance, the Authority or CRA finds that a Permanent Employer has not complied with any of the requirements of Exhibit S, the Authority or the CRA shall immediately issue to the Developer and Permanent Employer a written finding of non-compliance and provide a sixty (60) day opportunity to cure. In order to cure and to avoid the penalties set forth below, the Developer must make a detailed showing to the Authority or the CRA that:

i. the non-compliant Permanent Employer has made diligent use of all reasonable and necessary methods to meet each of the requirements in Section IV.B. of this Exhibit S; or

ii. the non-compliant Permanent Employer has met the Goals set out in Sec. IV.A of this Exhibit S; or

iii. following the initial finding of non-compliance, the Developer or another compliant Permanent Employer with whom the Developer has a contract, has made new hires of Local Low-Income Residents in an amount equal to the number of Local Low-Income Residents by which the non-compliant Permanent Employer fell short of the 30% local hiring goal set out in Section IV.A.. The Developer may rely only once on each additional hire made by already compliant Permanent Employers in its effort to avoid penalties under this Section V.B.iii

**C. Penalties for Non-Compliance.**

If, prior to the end of the sixty (60) day cure period described in Section V.B. above, the Developer has not made the showing set forth in Section V.B., the Authority or the CRA may require the Developer to pay to the Authority or the CRA an amount equal to Fifty Dollars ($50.00) multiplied by the sum of the number (as calculated on hours worked based on an eight (8) hour day for a full-time position) of Local Low-Income Residents short of the 30% local hiring goal set out in Section IV.A., per calendar day following the initial finding of non-compliance. In addition to the payments set forth in this Section V.C., if the Developer has not provided evidence that at least ten percent (10%) of the workforce is comprised of Local Low-Income Residents, the Developer shall pay to the Authority or the CRA, at the end of each full calendar quarter, an amount equal to One Thousand Two Hundred Fifty Dollars ($1,250.00) multiplied by the sum of the number (as calculated on hours worked based on an eight (8) hour day for a full-time position) of Local Low-Income Residents short of the 10% of the total workforce. The CRA shall reasonably determine the first calendar quarter in which the 10% requirement applies based on the commencement of operations of Permanent Employers. The Developer will continue to pay this penalty until the Developer can make the showing set forth in Section V.B.i.,V.B.ii or V.B.iii. The provisions of this Section V.C. shall continue throughout the Term.

In the event the Developer disputes the finding of the Authority or the CRA that the Developer has not made the showing set forth in Section V.B. above, the Developer may invoke the Dispute Resolution procedures outlined in Article 17 of the DDA.

**Exhibit One**

# THE LOS ANGELES GRAND AVENUE AUTHORITY'S FINDINGS CONCERNING THE POTENTIAL ENVIRONMENTAL EFFECTS OF THE GRAND AVENUE PROJECT AND THE CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT AND THE STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE GRAND AVENUE PROJECT

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# THE LOS ANGELES GRAND AVENUE AUTHORITY'S FINDINGS CONCERNING THE POTENTIAL ENVIRONMENTAL EFFECTS OF THE GRAND AVENUE PROJECT AND THE CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT AND THE STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE GRAND AVENUE PROJECT

## I. Introduction And Purpose

The Lead Agency, the Los Angeles Grand Avenue Authority ("Authority"), which is an independent public agency established through a Joint Exercise of Powers Agreement (The "JPA Agreement") between the Community Redevelopment Agency of the City of Los Angeles ("CRA/LA") and the County of Los Angeles ("County"), hereby adopts and makes the following findings (the "Findings") in connection with its certification of the Final Environmental Impact Report ("FEIR") for the Grand Avenue Project (the "Project"). The FEIR is a Project EIR, as defined by Section 15161 of the State Guidelines for the California Environmental Quality Act, 14 C.C.R. Section 15000 et seq. ("CEQA Guidelines"), and serves as an informational document for the general public, the Authority and other government agencies.

The Authority has received, reviewed and considered the information provided in the FEIR, the hearings and the submissions of testimony from public agencies, organizations, individuals and other entities. Having received, reviewed and considered that information, the information provided in the record of these proceedings, and the recommendations of staff for the Authority, the Authority makes the findings set forth herein. These findings are adopted in compliance with California Environmental Quality Act, California Public Resources Code Section 21000 et seq., the CEQA Guidelines, all applicable local guidelines concerning the application and implementation of that statute, and all applicable case law concerning that statute and the CEQA Guidelines (collectively, "CEQA"). Public Resources Code Section 21081 states:

"No public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment."

In addition, CEQA Guideline 15090 provides that:

(a) Prior to approving a projecting the lead agency shall certify that:

(1) The final EIR has been completed in compliance with CEQA:
(2) The final EIR was presented to the decisionmaking body of the lead agency and that the decisionmaking body reviewed and considered the information contained in the final EIR prior to approving the project; and
(3) The final EIR reflects the lead agency's independent judgment and analysis."

The FEIR identifies certain significant effects which may occur as a result of the proposed Project, or which may occur on a cumulative basis in conjunction with the development of the Project and other past, present, or reasonably foreseeable future projects. In addition to reviewing the Project's potential environmental impacts, these Findings also provide the Authority's analysis and conclusions regarding the applicability of possible alternatives and mitigation measures to reduce any significant environmental effects.

## II. The Lead Agency, The Responsible Agencies, And The Developer

Pursuant to the JPA Agreement and applicable law, the Authority serves as the Lead Agency, as that term is defined under CEQA Guidelines 15050-15051. In addition to other duties, the Authority has overseen the process of obtaining ground leases from the County and CRA/LA for the proposed development parcels, and re-leasing these parcels to the developer for the development of the Project. The Authority has contracted with the Grand Avenue Committee to provide services in relation to these real property transactions. The Authority has also been responsible for the preparation of the FEIR.

The County and the CRA/LA have served as "Responsible Agencies" for the Project as that term is defined under CEQA Guidelines 15096 and 15381. As Responsible Agencies, the County and CRA/LA have worked closely with the Authority in ensuring the FEIR has examined all potential environmental impacts.

In addition to the above responsibilities, these agencies, as well as the City of Los Angeles reviewed and approved the Grand Avenue Implementation Plan, which formulated the framework of the project description evaluated in the EIR prepared by the Authority for the mixed use development. That plan generally described the location of the Project, its proposed uses and other elements. The governing bodies for the Authority, County, the CRA/LA and the City of Los Angeles each approved the Implementation Plan in 2005.

The developer of the Project, the Related Companies, L.P. and its development entity Grand Avenue L.A., LLC (collectively "the developer"), was selected through a competitive process and will oversee the actual development of the Project.

## III. The Project

### a. Description

The Project consists of three major components: (1) the creation of the 16-acre Civic Park that builds upon and expands the Civic Mall, and when completed, will connect the Los Angeles City Hall to Grand Avenue; (2) streetscape improvements along Grand Avenue from Fifth Street to Cesar E. Chavez Avenue; and (3) the development of five parcels which are referred to as Parcels Q, W-1, W-2, L and M-2. Parcels Q and W-2 are currently owned by the County, Parcels L and M-2 are currently owned by CRA/LA, and Parcel W-1 is owned by a private third party. (While the developer is pursuing the acquisition of Parcel W-1, the development of the other parcels and components of the Project may proceed even if the developer does not acquire Parcel W-1.) The Parcels are identified by these letters in the Redevelopment Plan for the Bunker Hill Redevelopment Project Area. The Project currently consists of two development options, referred to in the Findings and the FEIR, as the "Project with County Office

Building Option," and the "Project with Additional Residential Development Option." Under the Project with County Office Building Option, development of the five parcels will consist of up to 2,060 residential units, 20 percent of which (up to 412 units) would be provided as affordable housing; up to 275 hotel rooms, up to 449,000 square feet of retail space and up to 681,000 square feet of County office space. Under the Project with Additional Residential Development Option, the 681,000 square feet of County office space would be replaced with up to 600 additional residential units, 20 percent (up to 120 units) would be provided as affordable housing. All other components of the Project would be the same under this option, and would include 275 hotel rooms, and 449,000 square feet of retail space. The proposed County office space under the Project with County Office Building Option would be constructed in the third phase of the Project when parcels W-1 and W-2 are developed. The proposed residential units under the Project with Additional Residential Development Option would be developed on parcel W-2 of the Project. Under that certain Disposition and Development Agreement between the Authority and Related (the "DDA"), recommended to be approved subsequent to consideration and certification of the FEIR, the County's option for development of a public office building during the third phase of development expires on a specific date in the future. If the County does not exercise this option, the developer may develop the Project consistent with the Additional Residential Development Option.

Parking for the Project would be provided in podium and subterranean parking structures. 5,035 parking spaces would be provided under the County Office Building Option, and 5,255 parking spaces would be provided under the Additional Residential Development Option.

In addition to the development of the five parcels, the Project will revitalize and expand the existing Civic Center Mall through a new design. The main purpose of this new design is to facilitate a program of ongoing and special civic events and activities to take place in the new Civic Park. The current conceptual plan for the Civic Park maintains the existing organization of space in the Park, with the intent that specified areas would accommodate particular programmed uses and also work in unison for larger events. Under this plan, different sections of the Park would be developed for cultural and entertainment uses, a garden space for smaller scale uses, and civic and community activities.

The Project will also entail streetscape improvements along Grand Avenue from Fifth Street to Cesar E. Chavez Avenue. Streetscape improvements are anticipated to include widened shaded sidewalks where feasible, landscaping, as well as a range of street furnishings, including benches and chairs.

In order to fully respond to the future needs and demands of the Southern California economy, the proposed Project includes an Equivalency Program that would allow the composition of on-site development to be modified to respond to future needs

in a manner that would not increase the Project's impacts on the environment. The Equivalency Program would provide flexibility for modifications to land uses and square footages within the five parcels. Within this framework, land uses can be exchanged for certain other permitted land uses so long as the limitations of the Equivalency Program are adhered to, which limitations were designed so no additional environmental impacts would occur. Thus, all permitted Project land use increases can be exchanged for corresponding decreases of other land uses under the proposed Equivalency Program without any further CEQA review.

This equivalency program was analyzed in the FEIR to confirm that exchange of Project uses set forth in the program can occur without the need for subsequent CEQA analysis. Proposed exchanges under the equivalency program would be implemented through the City of Los Angeles Planning Department procedures.

**b. Minor Potential Changes to Project Since Publication of DEIR**

Since publication of the DEIR, the developer is considering the possibility for the Project with Additional Residential Development Option of locating up to 15% of the parking spaces for Parcel Q (up to 227 spaces) off-site, but within one or two blocks of Parcel Q, to the extent such spaces are available for use in existing parking facilities. For the reasons discussed in Section XI(B)(c)(iii), below, no new significant impact would occur due to this minor change in the parking arrangements for the Project.

**c. Location and Existing Uses**

The Grand Avenue streetscape component of the Project is located on Grand Avenue between Fifth Street on the South and Cesar E. Chavez Avenue on the north. The proposed Civic Park component is an expansion and upgrade of the existing Civic Center Mall. The Civic Center Mall is an east-west oriented public open space area located between Los Angeles City Hall on the east and Grand Avenue on the west. The proposed Civic Park site consists of the existing Civic Center Mall, which is divided by Hill Street into two defined sections, and an existing surface parking lot located between Spring Street and Broadway. That 349-space surface parking lot currently serves the County Criminal Court building. The Civic Center Mall is located mid-block, bordered by public buildings to the north and south, which front on Temple Street to the north and First Street to the south.

The five parcels proposed for development are located on the east and west sides of Grand Avenue in downtown Los Angeles. Parcels Q and W-1/W-2 comprise an approximate two-block area, bounded by First Street to the north, Hill Street to the east, Second Street to the south and Grand Avenue to the west. Olive Street, which borders Parcel Q on the east and Parcels W-1/W-2 on the west, divides Parcel Q from Parcels W-2. In this area, Second Street tunnels under Bunker Hill to Figueroa Street. Parcels M-2

and L are located on the west side of Grand Avenue, and are bounded by Hope Street to the west, Grand Avenue to the east, and Second Street on the north.

All five parcels proposed for development are currently utilized as vehicle parking lots. Parcel Q contains an existing steel, 1,062 space parking structure, including 913 juror parking spaces (700 usable) and 149 County Courthouse visitor parking spaces. Parcels L, M-2, and W-1/W-2 are used as an asphalt surface parking lot surrounded by chain link fences.

### d. Surrounding Uses

Surrounding and nearby land uses include high-rise office buildings to the south; cultural uses, such as the Walt Disney Concert Hall, the Los Angeles Music Center, the Cathedral of Our Lady of the Angels, the Museum of Contemporary Art (MOCA) and Colburn School of Performing Arts along Grand Avenue; and government buildings, such as the Los Angeles City Hall, the County's Kenneth Hahn Hall of Administration and the Hall of Records as well as the Los Angeles County/Stanley Mosk Courthouse north of First Street. Surrounding residential land uses include the Grand Promenade Tower to the south of Parcels L and M-2; Bunker Hill Towers and Promenade Plaza to the west/northwest of Parcels L and M-2, and Angelus Plaza and Museum Tower to the south of Parcels Q and W-1/W-2. The residential uses in this area are generally high-rise, ranging from 17 stories (Angelus Plaza) to 32 stories (Bunker Hill Tower). Low-rise residential uses are located to the north of Cesar E. Chavez Avenue.

### e. Construction Phasing

Development of the proposed Project is anticipated to occur in three phases. The initial development phase would include the simultaneous completion of Civic Park, Grand Avenue streetscape improvements between Second and Temple Streets, and the development of Parcel Q. The second phase would include the development of Parcels L and M-2, and the third phase would include the development of Parcels W-1/W-2. Additionally, the development of the streetscape improvements between Second Street and Fifth Street, and between Temple Street and Cesar E. Chavez Avenue would be completed by the end of the third phase of development. Construction for each of the three development phases would require a period of approximately three years. Construction stages would include demolition, excavation, and construction of foundations, garages, and podium to the street level (Year 1); construction of the superstructure from the top of the podium and the initial shell enclosure (Year 2); and interior and exterior finish construction and landscaping for the first phase; 2010-2012 for the second phase; and 2013-2015 for the third phase. However, the potential exists that construction for the Project's second phase could be accelerated relative to the foregoing schedule in response to changing market conditions. In the event that the overall construction schedule is accelerated, the second phase of the Project would commence in

2008 rather than 2010. Under the accelerated scenario, the second phase would overlap part of the first phase, but the duration of each phase would remain at 36-months.

### f. Changes to Project Attributable to Re-Location of Towers on Parcels L and M

As discussed more fully in the description and analysis of "Alternative 4" to the Project (refer to Section XII of these Findings), the Authority finds that an element of that Alternative 4 can feasibly mitigate the Project's impacts on certain views. That element consists of a change in the location of the towers proposed for development on Parcels L and M-2 such that those towers would be reversed; the tower proposed for the southeast corner of Parcels L and M-2 would be moved to the southwest corner, and the tower proposed for the northwest corner would be moved to the northeast corner. Such a change in the configuration of the Project will reduce the Project's impacts on certain views from the Grand Promenade Tower to a less than significant level. Accordingly, the Authority approves that change in the Project.

## IV. Applicable City of Los Angeles Zoning And Other Land Use Plans

The Project is located in the Bunker Hill and Amended Central Business District Redevelopment Project Areas. The development component of the Project would occur across five parcels located within CRA/LA's Bunker Hill Redevelopment Project Area. The Bunker Hill Redevelopment Project Area includes a geographic area bounded by First Street on the north, Hill Street on the east, a varying boundary between Fourth and Fifth Street on the south and the Harbor Freeway on the west. The Civic Mall is located within the north sector of the Amended Central Business District Redevelopment Project Area, which is bounded by the Hollywood Freeway on the north, Alameda Street on the east, First Street to the south, and the Harbor Freeway on the west.

The five development parcels are located within the City's Central City Community Plan area. Under such applicable City zoning, the five development parcels are currently zoned R5-4D, and Parcels Q, W-1 and W-2, are currently zoned R5-4D and C2-4D. All these parcels are designated Regional Center Commercial, which corresponds to the R5-4D and C2-4D zoning.

## V. Project Objectives

The ultimate goal of the Project is to provide an economically viable, architecturally distinguished, community-oriented, mixed-use development with welcoming public open spaces that will create, define, and celebrate the Civic and Cultural Center as a regional destination in downtown Los Angeles. The Project's priority and other objectives are as follows:

**Priority Objectives**

- Create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, through a mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill.
- Implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design, in order to create a pleasant living and working environment.
- Generate at least $50 million in funds from the earlier phases of the Project itself, and at least $45 million from Phase 1, by the lease of public land, and use these funds to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve as a public gathering place for the entire region.
- Ensure that 20 percent of all residential units in the Project are affordable units for low-income residents.
- Create a long-term stream of additional tax revenues for the City, the CRA/LA and the County.

**All Objectives**

**Generate Specific Public Benefits**

- Generate at least $50 million in funds from the Project itself, and at least $45 million from Phase 1, by the lease of public land, and use these funds to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve as a public gathering place for the entire region.
- Create a long-term stream of additional tax revenues for the City, the CRA/LA and the County.
- Ensure that 20 percent of all residential units in the Project are affordable units for low-income residents.
- Expand upon the recent success of projects on Grand Avenue such as the Walt Disney Concert Hall, the Cathedral of Our Lady of the Angels, the Museum of Contemporary Art, Colburn School of Performing Arts and other projects, by developing four publicly-owned parcels of land at the top of Bunker Hill, whereby the property owners and a private developer work together to create a project of regional impact which generates significant benefits for the public.

- Create public spaces on the development sites that enhance the attractiveness of the Project and that are open and accessible to the public.
- Increase economic activity in the Project area, including the provision of new permanent jobs and the creation of a significant number of construction jobs.
- Create a more welcoming environment for the community and visitors to the center of the city, increasing the number and diversity of patrons to the cultural and commercial attractions of the Bunker Hill Redevelopment Project area.
- Increase the value of the underlying, publicly owned real estate while minimizing public investment in the Project.
- Continue the transformation of the Bunker Hill area into a significant high-rise urban environment in downtown Los Angeles by development of the last major undeveloped, underutilized sites in the Redevelopment Project area.

**Activate Downtown Los Angeles**

- Create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting more people, day and night, through am mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill.
  - Develop a substantial amount of housing, inclusive of affordable housing, in order to expand the diversity of downtown living options.
  - Provide an exceptional hotel within the development to serve and enhance the multifaceted visitor related activities and destinations in the Project area.
  - Provide retail and entertainment uses in a distinctive mixed-use environment to serve and welcome residents as well as visitors from throughout the region and beyond.
  - Provide public parking at a reasonable rate that will attract the public to the Grand Avenue area as well as to the retail, entertainment, and hotel uses within the Project.
  - Allow for the possibility of County office use within the later phases of the Project.
  - Program and design the Project to appeal to various market segments and residents of surrounding neighborhoods.
- Create a northern anchor for the downtown area to complement the southern anchor at "LA Live" to create a more diverse and vibrant downtown core.

**Create a Civic Gathering Place**

- Improve and expand the existing Los Angeles County Mall into a Civil Park so that it can be operated to serve as an active, welcoming setting for daily activity as well as a gathering place for community celebrations, cultural and ethnic celebrations, festivals, holiday events, political gatherings and the like.
- Improve both pedestrian and visual access to the park through the elimination of barriers such as the parking garage ramps at Grand Avenue and at Hill Street.
- Provide for functional and attractive linkages through the park connecting neighborhoods, government facilities, office uses, and retail uses located in proximity to the east of the Project area with Grand Avenue.

**Enhance Pedestrian Connections**

- Provide a design that emphasizes pedestrian and public transit opportunities, and that integrates linkages between pedestrian, public transit and the public roadways.
- Encourage pedestrian movement in the vicinity of Grand Avenue, providing easy access to and from the Cathedral, the Music Center, the Civic Park, the Walt Disney Concert Hall, the Colburn School, MOCA, the new Central High School No. 9 (under construction), the proposed development project, the various courthouses, and the County and City seats of government.
- Encourage the use of public transportation to and from the downtown through the use of appropriate bus, train, and other transit systems such as the existing Metro Red Line Civic Center Station, and through Red Line connections to Union Station and the region by commuter train, as well as by regional bus transit and local bus transit.
- Create an attractive pedestrian connection from the Civic Center, south to the Financial District, integrating the Civic Park and Grand Avenue into the overall downtown context.

**Create Distinguished Architectural Design**

- Create an architecturally distinguished project which meets the level of quality of neighboring buildings such as: the Walt Disney Concert Hall, the Cathedral of Our Lady of the Angels, the Music Center, the Museum of Contemporary Art, the Colburn School for

the Performing Arts, the Caltrans Building, and the high school for the arts on Fort Moore Hill.

- Build to high densities and create a critical mass of activity in order to energize the Cultural and Civic Center.

**Facilitate Achievement of Redevelopment Goals for the Bunker Hill and the Central Business District**

- Implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design, in order to create a pleasant living and working environment.
- Improve the jobs/housing balance downtown.
- Contribute to the goal of creating a world class downtown and assist in the development of downtown as a major center of the Los Angeles metropolitan region.
- Create synergies between the City, the CRA/LA and the County to improve properties in the Redevelopment Project areas.
- Implement redevelopment plan objectives to provide that the proposed residential area of the project be developed to provide housing, among others, for workers who seek a living environment near their places of work as well as near the available cultural, educational and entertainment facilities.
- Implement redevelopment plan objectives by contributing to the creation of a plan of land use of great benefit to the people of the entire Los Angeles metropolitan area; by the provision of facilities in large demand for modern, convenient, and efficient living accommodations for downtown employees and by changing a tax liability to a tax asset for the people of the City and the County by increasing the tax revenue many times.
- Implement the current Design for Development for the Bunker Hill Redevelopment Project by implementing the principle that Bunker Hill has a unique and strategic location between the Central Business District and the Civil-Cultural Center and can play a role as a essential element of the core of the Central City by accommodating a variety of land uses and the full range of activities associated with a vital urban core, including commercial offices with supporting retail, entertainment, dining, transient housing with convention and exhibition facilities, and in-town residential uses.
- Establish vibrant neighborhoods containing a variety of housing types and community facilities.
- Promote a pedestrian network within a framework that accommodates large buildings and a variety of open spaces.

- Achieve excellence in design, giving emphasis to parks, green spaces, street trees, and places designed for walking and sitting.
- Link Bunker Hill and surrounding neighborhoods and districts through a coherent pedestrian network.

## VI. The EIR Process

In accordance with the requirements of CEQA, the Authority circulated a Notice of Preparation (NOP) for the proposed project on September 6, 2005. The purpose of the NOP was to solicit comments on the proposed content of the Draft EIR. The NOP was circulated for a period of 35 days, until October 1 The Parcels are identified by these letters in the Redevelopment Plan for the Bunker Hill Redevelopment Project Area.0, 2005.

During the following 35-day comment period, 14 letters were received. An open house and public scoping meeting for the Draft EIR was held on Tuesday, September 20, 2005. All NOP responses relating to the EIR were reviewed and the issues raised in those comments were addressed in the Draft EIR. The NOP, letters received during the NOP comment period, and scoping meeting transcript are included in Appendix A of the Draft EIR.

On June 14, 2006, the Authority prepared and distributed the Notice of Completion and Availability of the Draft EIR to all interested agencies, parties, organization, and persons. The Draft EIR was circulated for a 50-day review period, between June 14, 2006 and August 3, 2006.

The Authority received 17 letters from agencies, organization, and individual parties commenting on the Draft EIR. The Notice of Completion provided information of an open house and public meeting as an additional means to obtain information on the Project and to receive public comments on the content of the Draft EIR. The public meeting was held on Tuesday, July 18, 2006, between 6:00 p.m. and 8 p.m. at the Cathedral of Our Lady of the Angels, which is adjacent to the Project site. At the public meeting, thirteen speakers presented oral comments with regard to the content of the Draft EIR. In addition, one written comment form was submitted to the Authority. The written comments and transcript of the public meeting and responses to the comments are included in this Final EIR in Section V, Response to Comments.

The Authority finds no that no "new significant information" (as that term is defined in CEQA Guideline 15088.5 (a)) was added to the Draft EIR since the release of the Draft EIR that would warrant recirculation as provided in CEQA Guideline 15088.5. Among other reasons, the information added to the FEIR has not deprived the public of a meaningful opportunity to comment upon any significant environmental effect of the Project or any feasible way to mitigate or avoid such an effect. Instead, the new

information that has been added to the FEIR merely clarifies information contained in the Draft EIR.

The FEIR consists of the Draft EIR ("DEIR"), Responses to Comments, the Mitigation Monitoring Program sections entitled Preface, Introduction, Summary, and Corrections and Additions, and the appendices to these documents.

## VII. Necessary Public Agency Actions

In addition to the EIR Process mandated by CEQA, the following permits and approvals of the Project are anticipated to include, but may not be limited to the following:

**Los Angeles Grand Avenue Authority**

- Approval of ground subleases for Parcels Q, W-2, L and M-2 from the Grand Avenue Authority to the developer.
- Approval of the DDA between the Grand Avenue Authority and the developer.

**Community Redevelopment Agency**

- Approval of ground leases for CRA-owned Parcels L and M-2 from the CRA/LA to the Grand Avenue Authority and the sub-lease of these parcels to the developer.
- Approval of ground leases for Parcels Q and W-2 from the County to the CRA/LA, the sub ground leases to the Grand Avenue Authority and the sub ground leases by the Grand Avenue Authority to the developer.
- Approval of various agreements, bonds and security instruments for potential public financing for the affordable housing, public parking, and public infrastructure improvements in connection with the Project.
- Amendment of the 1991 approved Owner Participation Agreement between the CRA/LA and the County for Parcels K, Q and W-2 ("OPA Third Implementation Agreement").
- Approval of the DDA between the Authority and the developer.
- Approval of land uses and design review as permitted under the Redevelopment Plans and DDA.
- Approval of development of residential uses in areas designated as commercial under the Bunker Hill Redevelopment Plan.

**County of Los Angeles**

- Approval of ground leases for County-owned Parcels Q and W-2 to the CRA/LA, for further subleases to the Authority and the developer for the Project.
- Approval of the DDA between the Authority and the developer.
- Amendment of the 1991 Owner Participation Agreement between the CRA/LA and the County for Parcels K, Q, and W-2 ("OPA Third Implementation Agreement").

**City of Los Angeles**

- Under the City's oversight authority over the CRA/LA, approval of certain CRA/LA actions listed above, including, but not limited to, approval of the DDA, financing and leases.
- Approval of a Development Agreement (DA) between the City of Los Angeles and the developer.
- Approval of Subdivision Map for the five Parcels Q, W-1/W-2 and L/M-2.
- Approval of a Zone Change for those portions of Parcels Q, W-1/W-2 and L/M-2 that are zoned from R5/C2 to C2 to: (a) authorize the commercial uses proposed by the Project (e.g., hotel, retail, etc.); (b) eliminate the need for multiple conditional use permits and variances (concerning, for example, hotel use, parking requirements, commercial circulation, signage and alcohol service in the portions of the parcels currently zoned R5), and (c) establish a single zoning designation for Parcels Q and W-1/W-2 allow hotel use, public parking, commercial circulation, signage, and alcohol service in the portions of the five parcels currently zoned R-5.
- Approval of a Conditional Use Permit (CUP) to deviate from the current "D" restriction and exceed an FAR of 6:1.
- Approval for deviation of a Policy Deviation from Advisory Agency Policy 2000-1, which addresses standards for new condominiums and specifies a parking requirement higher than the LAMC.
- Approval of a Street Vacation (airspace) for the proposed Olive Street pedestrian bridge and General Thaddeus Kosciuszko Way tunnel if not within a tentative tract map.
- Approval of a Zone Variance to allow residential density to exceed the number of units allowed in the C2 zones by 20 percent or greater.
- Approval of a Zone Variance if the Project cannot comply with common and/or private residential open space standards.
- Determination of a Shared Parking Plan to permit two or more uses to share parking spaces, if necessary.

- Approval of a Zone Variance for the Project relative to Yards and Setbacks, for projects that cannot comply with the yard/setback requirements of the C2 Zone.
- Approval of Conditional Use Permits (CUPs) for Alcohol Sales.
- Approval of improvements within the Grand Avenue right-of-way.
- Approval of a Signage District and/or variance concerning parking requirements applicable to affordable housing units (possible future actions).
- Approval of demolition, grading, foundation, and building permits.
- Approval of Street Right-of-Way Dedications along major streets.
- Approval of haul route(s), as necessary.
- Variances and Encroachment permits (irrevocable and revocable) as required for construction within public ways, as well as for installation of public improvements.
- Miscellaneous approvals, as required:
  - Grand Avenue design and construction;
  - Construction within Second Street tunnel easement;
  - Temporary closures of streets and sidewalks;
  - Curb cuts and lane dropoffs;
  - Utilities relocation, replacement, and extension;
  - Sewer line extensions and upgrades;
  - Additional required approvals and permits from the Department of Public Works, Building and Safety, Mechanical Bureau, and other City departments that may be necessary to construct or operate the Project.
    - Approval of the development of residential uses in areas designated as commercial under the Bunker Hill Redevelopment Plan.

## VIII. The Authority's Certification Of The FEIR

Staff for the Authority and its member agencies, the County and the CRA/LA independently reviewed, analyzed and required changes to all of the documents comprising the DEIR and the FEIR prior to the publication of those documents. The DEIR which was circulated for public comment as well as the Final EIR reflect the independent judgment of the Authority. Therefore, in accordance with the applicable provisions of CEQA, the Authority hereby FINDS and CERTIFIES that:

(a) The FEIR has been completed in compliance with CEQA.

(b) The FEIR has been presented to the governing body of the Authority ("Board"), and the Board has independently reviewed and analyzed the information contained in the FEIR prior to acting on the Project.

(c) The FEIR reflects the Authority's independent judgment and analysis.

## IX. Potentially Significant Environmental Effects Addressed In The FEIR And These Findings

These Findings address the potentially significant environmental effects examined in the FEIR. The FEIR analyzed the environmental impacts at a project-specific level and on a "cumulative" impact basis. A cumulative impact is defined by CEQA Guidelines 15130 and 15355 as an impact which is created as a result of the combination of impacts of the project evaluated in the EIR and closely related past, present and reasonable foreseeable probable future projects (commonly known as "related projects"). The FEIR identified 93 related projects in the relevant geographic area. The inclusion of those 93 related projects in the cumulative impact analysis resulted in a conservative analysis since it is not likely that all of those projects will be developed.

### A. Less than Significant Impacts

In summary, the following environmental impacts have been determined to be less than significant in light of, among other reasons, the imposition of mitigation measures, regulatory measure and/or project design features: (1) light and glare impacts; (2) visual quality; (3) noise impacts during Project operations; (4) impact on parks and other recreational uses during Project operations; (5) library services (project-specific); (6) population, housing and employment impacts; (7) hazardous materials; (8) fire protection services; (9) school services; (10) water supply; (11) wastewater; (12) solid waste; (13) police services (project-specific impact); (14) shade and shadow impacts (project-specific impact) and (15) land use compatibility and consistency with land use plans and policies.

### B. Significant and Unavoidable Impacts

The following environmental impacts were determined to be significant and unavoidable even after the imposition of all feasible mitigation measures, regulatory measures and project design features: (1) land use and zoning impacts; (2) traffic impacts during Project construction and operation; (3) parking impacts due to inability to comply with certain City residential parking policies; (4) view impacts; (5) historical resources; (6) air quality impacts during Project construction and operation; (7) noise impacts during Project construction; (8) police services (cumulative basis only); (9) shade and shadow impacts (cumulative basis only); (10) library services (cumulative basis only); and (11) impact on parks and recreational uses during Project construction. The impacts identified in Items (1) through (7) and Item (11) are significant and unavoidable on a project-specific and cumulative basis.

## X. Potential Environmental Impacts Studied In The Initial Study But Not Analyzed Further In The DEIR

In accordance with CEQA Guideline 15063, the Authority prepared an Initial Study, which is included as Appendix A to the DEIR. The Initial Study determined which potentially significant effects may be caused by the Project and needed to be further examined in the DEIR, and which environmental effects would not be caused by the Project and, therefore, required no analysis in the DEIR. Based on that Initial Study and other substantial evidence, the Authority determined that the Project would not have the potential to cause significant impacts in the following areas: (1) agricultural resources, (2) biological resources, (3) geology and soils, (4) hydrology and water quality, and (5) mineral resources, and that it was appropriate that no further analysis of those five impact issues was included in the DEIR. The Authority further determined that the rationale provided in the Initial Study that no significant impacts would occur respecting these five impact areas satisfies the requirement of CEQA Guideline 15128. Thus, the Authority has no evidence before it to indicate that the Project could have any potential for an adverse effect on fish and wildlife resources or the habitat upon which the fish and wildlife depends.

A comment was raised during the public review process concerning the potential impact to biological resources associated with the removal of mature landscaping, including trees. More specifically, the comment notes that the removal of mature trees and landscaping from in the existing Civic Center Mall during construction activities may cause this impact. Although the impact to biological resources is still determined to be less than significant, the following regulatory measure has been identified to ensure this less than significant impact to biological resources:

- **Regulatory Measure A-1:** Project construction involving of on-site clearance of vegetation, excavation, or other construction activities shall avoid, to the extent feasible, from occurring between March 1 and August 31 (and between February 1 and August 31 for raptors). Prior to the completion of final plans and specifications for the Civic Park, the County Chief Administrative Officer (CAO) or designee shall review the plans and specifications to ensure that the contractor is apprised of the requirements of the Migratory Bird Treaty Act (MBTA) and encouraged to schedule removal or relocation of mature trees and removal of other potential nesting habitat outside of the breeding season. In the event that the identified construction activities must occur within the specified time period, a qualified biologist acceptable to the County Chief Administrative Officer shall complete weekly surveys within the Civic Park site that is subject to disturbance, and within 500 feet of the boundary of such areas, to determine if any protected native birds are present. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If an active

nest is located within trees or other habitat scheduled for removal or relocation, or within 300 feet of the construction area, construction shall be suspended within 300 feet of the nest (500 feet for raptor nests) until such time a qualified biologist determines if construction activities are interfering with nesting activities. If construction activities are determined to not interfere with nesting activities, construction may continue with a biological monitor present. Should a tree or other habitat scheduled for removal or relocation be determined to contain an active nest, removal or relocation shall be delayed until the nest is determined to be inactive or a permit is granted by the USFWS for take pursuant to the MBTA.

The distance limits of construction to avoid a nest shall be identified in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area. The County CAO or designee shall record the results of the protective measure above.

During the public review process, a comment was raised as to whether the DEIR should have undertaken an additional analysis of the Project's potential energy impacts. No such analysis is warranted for a number of reasons. First, the Initial Study identified the Project's specific amounts of electricity and natural gas consumption, and based on those amounts, concluded that the Project's energy demands would fall within the projected energy demands for the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company (SCGC). Accordingly, the Initial Study determined that no further analysis of this issue in the DEIR was warranted.

Second, the Project's sustainability, energy conservation, and efficiency is reflected throughout the EIR and in the DDA. For example, a number of the Project objectives emphasize the pedestrian and public transit opportunities that will be created by the Project, as well as its linkages between pedestrian, public transit and other public roadways. The Project will also promote energy efficiency through reduced reliance on the automobiles, an improvement of jobs/housing balance, and the encouragement of the use of public transportation to and from the downtown area.

Third, the Project's energy demands were disclosed in the DEIR (in addition to the Initial Study attached to the DEIR). For example, the Project's air quality analysis addresses emissions from fuel consumption by motor vehicles as well as consumption of natural gas and electricity during Project operations. That analysis provide a quantification of the Project's energy consumption .

Fourth, the incorporation of "Title 24" (the State's Energy Code) requirements into the Project is reflected in Regulatory Measure F-2, which states: "all residential and non-residential buildings shall, at minimum, meet the California Title 24 Energy Efficiency Standards for water heating, space heating and cooling." Thus, the Project

will comply with all requirements of Title 24 applicable to the residential and commercial components. California's Title 24 is the most restrictive energy code in the nation, and imposes strict standards in order to achieve energy efficiency. With regard to comments suggesting the inclusion of Leadership in Energy and Environmental Design (LEED), as the Project's final building designs have not been developed as of this date, a commitment to specific LEED building design measures would be premature and, therefore, any further discussion of specific energy design features would be speculative.

Lastly, because the Project will be in compliance with the Title 24 requirements, the Project complies with CEQA and the CEQA Guidelines, including Appendix F thereto. Appendix F speaks to a discussion of energy impacts and applicable mitigation measures only when a project will be energy inefficient or wasteful. Through compliance with Title 24, the Project will not be energy inefficient or wasteful. For all these reasons, the Authority finds that no additional analysis of the potential energy impacts of the Project is required under CEQA.

Finally, certain comments were raised during the public review process as to whether the Project may exacerbate or not alleviate local labor issues, homelessness and other social issues. CEQA generally provides that an EIR is required to evaluate only the environmental impacts of a project, and economic and social effects of a project are not treated as significant effects on the environment. Thus, economic or social effects of a Project need not be analyzed in an EIR unless they may directly cause a physical impact on the environment. While such matters are important, the Authority finds that the economic and social issues raised during the 50-day public review and comment process for the DEIR described in Section VI of these Findings will not cause any potentially significant "environmental" impacts that are not addressed in the FEIR.

## XI. Potential Environmental Effects Analyzed In FEIR

### A. Land Use

a. Consistency With Land Use Plans and Compatibility With Surrounding Uses

i. Potential Impacts – The Project may have a significant land use in the areas of consistency with land use plans and compatibility with surrounding uses impact if:

1. The Project development would be incompatible with surrounding land uses or land use patterns in relation to scale, use, or intensity.
2. The Project would not be consistent with any applicable land use plan or policy of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect.

ii. Findings – The Project will not have a significant impact concerning consistency with land use plans or compatibility with surrounding uses. Therefore, no mitigation measures are required or were identified in the FEIR.

iii. Supportive Evidence and Rationale – The Project's potential land use impacts concerning consistency with land use plans and compatibility with surrounding uses are analyzed in detail in Section IV.A. of the DEIR. The Project would be compatible with the adjacent and surrounding existing land uses and, as such, the Project would not create a division or disruption of an established community. Further, the Project's scale and mix of uses complement, and will be consistent with, the surrounding commercial and residential uses in the downtown area. In addition, the Project would be consistent with adopted land use plans, including the City's General Plan Framework, the Central City Community Plan, the Bunker Hill Redevelopment Plan, and the Southern California Association of Governments' Regional Comprehensive Plan and Guide. Thus, the Project would result in less than significant impacts relative to land use compatibility and adopted land use plans.

iv. Cumulative Impacts – The 93 related projects that are planned or are under construction in the Project area are anticipated to occur in accordance with adopted land use plans and regulations. It is reasonable to assume that the projects under consideration in the area surrounding the Project would implement and support important local and regional planning goals and policies. It is also anticipated that any new projects would be subject to an environmental review process and would incorporate any mitigation measures necessary to reduce potential land use impacts. Therefore, no significant impacts with regard to adopted land use plans would occur.

Zoning

v. Potential Impacts – The Project may have a significant zoning impact if:

1. The Project is not consistent with any land use or zoning law or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

vi. Findings – The Project will cause a significant and unavoidable land use impact relative to the zoning regulations of the City of Los Angeles on a project–specific and

cumulative basis. The Authority makes the following finding for this impact:

1. This impact can be mitigated to a level of less than significant if the City approves certain land use entitlements that have been applied for by the developer, which application is still pending as of the date of these Findings. Accordingly, the Authority finds that measures, such changes or alterations to the Project necessary to mitigate this impact are within the responsibility and jurisdiction of another public agency and not the Authority. The Authority further finds that such measures, changes or alterations should be adopted by such other agency.
2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section is acceptable in light of the Project's overall benefits.

vii. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's land use impact relative to zoning in Section IV.A of the DEIR. The County Office Building Option and the Additional Residential Development Option would require zone changes and variances to permit the proposed development of five development parcels. With the granting of such zone changes and variances, which may be granted only after certification of the Final EIR by the Lead Agency and concurrently with action on the entitlements requested from the City by the developer, there would be no significant zoning impact. However, since the Project, under both Project Options, would be acted on by the Lead Agency (the Authority) prior to the City's decision on such zoning requests, the Project would not be in compliance with the current zoning provisions at the time of the Authority's approval of the Project. Therefore, it is conservatively concluded that, for purposes of CEQA, there would be a significant impact relative to zoning. No mitigation within the jurisdiction of the Authority exists to address non-compliance with the City's existing zoning regulations. The necessary change required in order to avoid this significant impact lies not with the Authority, but rather with the City of Los Angeles.

viii. Cumulative Impact – Since the Project would create a significant impact with respect to the City's zoning and

regulations, and related projects may require a variety of variances and zone changes, it is conservatively concluded that cumulative zoning impacts would be significant and unavoidable.

**B. Traffic, Circulation and Parking**

a. Traffic, Construction

i. Potential Impacts – The construction of the Project would cause a significant traffic impact due to (1) hauling activities; (2) temporary lane closures; (3) reconstruction of Civic Mall Ramps, (4) pedestrian access; (5) bus stop relocation; and (6) construction worker parking if:

1. The Project construction causes substantial delays and disruption of existing traffic and pedestrian flow.
2. The Project causes temporary relocation of existing bus stops to more than one-quarter mile from their existing stops.

ii. Findings – The Project will not cause a significant traffic impact with respect to pedestrian access, bus stop relocation and construction worker parking due to, among other reasons, the adoption of the measures identified in this Section XI-B(a) of the Findings. The construction of the Project will cause a significant and unavoidable traffic impact with respect to hauling activities, temporary lane closures, and reconstruction of the Civic Mall's parking ramps on a project–specific and cumulative basis. With respect to those significant and unavoidable impacts, the Authority makes the following findings:

1. All feasible measures, changes and alterations have been required in, or incorporated into, the Project, which will lessen such significant environmental effects.
2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-B(a) is acceptable in light of the Project's overall benefits.

Although the following mitigation measures aimed at reducing these significant and unavoidable traffic impacts during Project construction have been adopted, these mitigation measures will not reduce those impacts to a level of insignificance:

**Mitigation Measure B-1**: The developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, prior to the start of each construction work phase, a Construction Traffic Control/Management Plan ("Plan") to be approved by the City of Los Angeles Department of Transportation ("LADOT") and implemented by the responsible party. The Plan shall include, but not be limited to, Project scheduling, the location and timing of any temporary land closures, traffic detours, haul routes, temporary roadway striping, and signage for traffic flow, as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project, if necessary. The Plan should also provide for the coordination of construction areas, and for safe pedestrian movement throughout the Project Area such that adequate and safe pedestrian movement access is maintained to adjacent uses including the Walt Disney Concert Hall, the Music Center, the County Courthouse, and the Metro Red Line station portals (on Parcel W-2 and on the Court of Flags).

**Mitigation Measure B-2**: After approval of the Construction Traffic Control/Management Plan(s) required under Mitigation Measure B-1 and prior to the start of each construction work phase, the developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall submit a copy of the Plan(s) to the Authority or other appropriate agency, the City Chief Administrative Officer or designee, and the County of Los Angeles Chief Administrative Officer ("County CAO"). Following receipt of the Plan(s), the County CAO shall distribute that information to all County properties on Grand Avenue, including the Hall of Administration, County Courthouse, the Walt Disney Concert Hall, and the Music Center, for further distribution of information to employees and visitors on construction schedules, alternative travel routes, and land and sidewalk closure information, as appropriate, and the Authority or other appropriate agency, or the City, shall distribute to the appropriate City departments for the same purpose.

**Mitigation Measure B-3**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and

Streetscape Program under the applicable agreements, shall enter into one or more temporary arrangements with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off-street spaces for the construction workers during Project construction, and will require all construction workers to use these designated parking spaces. These temporary arrangements shall be to the satisfaction of (i) CRA/LA or (ii) the County's CAO or its designee.

iii. Supportive Evidence and Rationale – The EIR analyzed in detail the potential traffic impacts caused by Project construction in Section IV.B of the DEIR. No significant impacts on pedestrian circulation during construction would occur, and a less than significant impact will result to bus stop relocation. Although sidewalk closures may occur, one side of the street will continue to be available. Any potential increase in walking distance for pedestrians would not amount to a significant impact. Further, the temporary relocation of bus stops would be within two blocks of the Project site and within one-quarter mile of the original stop location, which is a distance that will not cause a significant impact. Also, with the implementation of Mitigation Measure B-3, no significant impact will result due to construction worker parking. The FEIR also evaluated the impact of construction trucks on A.M. peak hour traffic on roadways. During more than half of the Project's construction period, construction would generate approximately 40 trips a day, which would have minimal effect on peak hour roadway conditions. The highest number or daily truck trips would occur during the Project's peak excavation phases, and would range from approximately 130 to 300 haul trucks a day. As these trips would also be distributed throughout the day, the actual number of haul truck trips that would occur during the A.M. peak hour period would be relatively low. In addition, consistent with standard industry practice, the hauling of over-weight or over-size equipment during construction would largely occur prior to the A.M. peak hour period. With respect to the probably low number of truck trips that would occur during the A.M. peak period, the Project shall comply with the requirements of the City of Los Angeles with regard to haul truck trips attributable to the construction of the Project, as will be established in connection with LADOT's

review and approval of the Project's Construction Traffic Control/Management Plan and/or conditions of approval by the City in the various land use entitlements applied for by the Developer. However, it is conservatively concluded that because a portion of the construction truck trips could occur during peak hauling periods, including during the A.M. peak hour, a potentially significant and unavoidable short-term traffic impact may occur. Also, during the reconstruction of the Grand Avenue and Hill Street ramps to the existing Civic Center Mall garage, the diversion of traffic to alternate garage entrances would affect streets in the immediate vicinity of the County Garage block and potentially create a short-term significant and unavoidable traffic impact. Finally, complete closures of any streets are not expected during construction. However, such closures could occur due to unforeseen circumstances, in which case, they would cause temporary significant impacts. It is expected that, at most, one traffic or parking lane adjacent to the curb may need to be closed at certain locations for periods of up to 4 to 6 months, or up to approximately 18 to 24 months, depending on the stage of construction. Although temporary in nature, such closures would cause significant traffic impacts during such periods of time.

iv. Cumulative Impacts –

1. **Hauling.** The Project's highest periods of haul truck activity would be in the initial six to eight months of construction for each parcel, when trucks would carry excavated material from the site. During those periods a peak of 300 trucks a day are estimated. Because some of these trips could occur in the A.M. peak hour, haul truck trip periods could cause short-term, significant cumulative traffic impacts. Hauling required for the construction of some of the 93 related projects would potentially overlap with the initial six to eight months of construction for each of the Project's development parcels. Therefore, haul truck impacts would be cumulatively significant.
2. **Closure of Civic Mall Ramps.** In order to facilitate the development of the new Civic Park, the ramps to/from the County Mall parking garage on Grand Avenue will be reconfigured. Such work would require the ramps to be shut down for a period of time during the reconstruction. The diversion of traffic to

alternate garage entrances would only affect streets in the immediate vicinity of the County Garage block, but could potentially create temporary and short-term cumulatively significant traffic impacts. The temporary closure of access to related project sites would not impact the same streets adjacent to the County Garage block. However, other temporary access closures at any of the other sites, particularly the 15 related projects located on Grand Avenue, Olive Street, and Hill Street, would cumulatively contribute to congestion and, as such, would be cumulatively significant.

3. **Temporary Lane Closures.** Complete closures of any streets are not expected during construction. However, such lane closures could occur due to unforeseen circumstances, in which case they would cause temporary cumulatively significant impacts. The construction of any of the related projects has the potential to require temporary lane closures. Therefore, the impact of the Project and related projects, particularly the 15 related projects located on Grand Avenue, Olive Street, and Hill Street, would cumulatively contribute to congestion impacts resulting from temporary lane closures and such impacts are found to be cumulatively significant.

4. **Construction Workers.** The 93 related projects would draw upon a construction workforce from all parts of the Los Angeles region. However, since the majority of construction workers are anticipated to arrive and depart the individual construction sites during off peak hours, cumulative traffic impacts due to construction workers trips are concluded to be less than significant.

b. Traffic, Operations

i. Impacts – Operation of the Project may cause a significant traffic impact relative to (1) intersection capacity; (2) the County-wide Congestion Management Plan for Regional Highways ("CMP"); (3) driveway access; and (4) transit capacity.

1. An intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C; an increase in V/C ratio equal to or greater than 0.02 for intersections

operating at LOS D; and V/C ration equal to or greater than 0.01 for intersections operating at LOS E or F, after the addition of related projects, ambient growth, and Project traffic.

2. A significant driveway access impact would occur if:

(a) Intersections at the primary site access locations would operate at LOS F during the A.M. or P.M. peak hours; and

(b) The design features or physical configurations of the Project would affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists so as to create a hazardous condition.

3. Under the CMP, a significant traffic impact would occur if a project increases the demand to capacity ratio (D/C) of a freeway segment of 2 percent or more (D/C ratio increase greater than or equal to 0.02), which causes or worsens LOS F conditions.

4. A significant impact would occur if projected transit riders substantially exceed available transit capacity.

ii. Findings – The Project will not cause a significant traffic impact relative to driveway access, transit capacity and certain intersections due to, among other reasons, the adoption of the measures identified in this Section XI-B(b) of the Findings. The Project will cause a significant and unavoidable traffic impact with respect to certain intersections and, under the County Office Building Option, the CMP, on a project – specific and cumulative basis. With respect to those significant and unavoidable impacts, the Authority makes the following findings for this impact:

1. All feasible measures, changes and alterations have been required in, or incorporated into, the Project, which will lessen such significant environmental effects.

2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-B(b) is acceptable in light of the Project's overall benefits.

Although the following mitigation measures are aimed at reducing these significant and unavoidable traffic impacts attributable to Project operations, these mitigation measures will not reduce those significant impacts:

**Mitigation Measure B-4**: If the Project proceeds with the County office building option, the County, on an on-going basis following initial occupancy, shall fund and implement a Transportation Demand Management (TDM) program for the proposed County office use in Parcel W-1/W-2. The County's CAO shall ensure the County's review and approval of this TDM program. The TDM program could, for example, include an onsite transportation coordinator, post information on transit, and provide logistical support for the formation of carpools and vanpools, and other incentives to use transit and rideshare.

**Mitigation Measure B-5:** The developer, with regard to the five development parcels, shall implement ATCS in conjunction with the area-wide ATCS program, if not otherwise implemented, prior to the completion of the first phase of development at the intersections identified by LADOT, although the implementation of this measure will provide mitigation to all three Project phases. Implementation of ATCS shall occur in the northern part of downtown, north of Eighth Street, at the locations identified by LADOT. LADOT has determined that implementation of the ATCS mitigation improvements in the area surrounding the Project would comprise the following: (1) upgrades to Model 2070 traffic signal controllers at 35 intersections; (2) installation of 58 ATSAC/ATCS system vehicle detectors at 9 intersections; and (3) installation of CCTV cameras to provide video information to the ATSAC Center at eight locations. Subject to a final determination by LADOT of the improvements required for the Project, ATCS shall also include LADOT's Transit Priority System (TPS).

**Mitigation Measure B-6:** The following menu of mitigation measures have been developed to further reduce the Project's potential traffic and circulation impacts. The term "menu" refers to the various ways that each of the following measures can be implemented to achieve trip reduction. Selection shall be coordinated with the LADOT, who shall determine which of the mitigation measures are to be implemented.

- Provide enhanced walking connections along the Project street frontages to transit service (to bus stops and to the Red Line station portals at First Street and Hill Street). These could comprise pedestrian amenities along the

Project's street frontages, including landscaped sidewalks, wider crosswalks where feasible at key intersections, improved lighting for pedestrian safety at nighttime, and pedestrian wayfinding signage, to facilitate walking in the Project area. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of these Project components.

- The developer, as determined by LADOT and prior to initial building occupancy for each development phase, shall provide enhanced bus stops on the street frontages of the five development parcels. These enhanced bus stops may include bus shelters with passenger amenities such as benches, shaded areas, and transit information, that could be integrated into the overall urban design/landscaping of the Project.

- Provide transit information kiosks at various strategic locations on the Project site. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of those Project components.

- The developer, with regard to the five development parcels, shall participate in an on-going basis during Project operations, in a Share-Car program (e.g., Flexcar) that makes cars available to registered members. It is anticipated that up to three on-street parking spaces, subject to a determination of feasibility by LADOT, could be provided at key locations adjacent to the Project frontage for up to three Share-Cars. The Share-Cars could be available to both Project and non-Project users as long as they were members of the Share-Car program. The Project shall support a Share-Car organization's

application to the City, and following any implementation of such application shall promote the Share-Car concept and encourage its usage with Project residents and tenants.

- Provide improved vehicular directional signage on surface streets approaching and within the Project area to direct vehicles to specific destinations and parking locations, as appropriate, to minimize vehicles circulating in the Project area. Such signage should be approved to the satisfaction of LADOT. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park under the applicable agreements, shall implement these measures prior to the completion of construction for the Civic Park.

**Mitigation Measure B-7:** The Developer, with regard to the five development parcels, shall re-stripe the westbound approach of the Third Street and Hill Street intersection from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. This improvement would require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. The final lane configuration of this intersection shall be to the satisfaction of the City of Los Angeles Department of Transportation. In addition, any street widening and construction activities shall be coordinated with the City of Los Angeles Department of Public Works, Bureau of Engineering.

iii. Supportive Evidence and Rationale – The FEIR analyzed in detail the potential traffic impacts that may be caused by Project operation in Section IV.B of the DEIR. Specifically:

1. **Intersections:** The Project with County Office Building Option would generate approximately 1,551 A.M. peak hour trips and 2,464 P.M. peak hour trips. This Option would result in significant traffic impacts at seven intersections in the A.M. peak hour and in significant traffic impacts at seventeen intersections in the P.M. peak hour. The Project with Additional

Residential Development Option would generate approximately 1,019 trips in the A.M. peak hour and 2,003 trips in the P.M. peak hour. This Option would result in a significant traffic impact at six intersections in the A.M. peak hour and seventeen intersections in the P.M. peak hour. With the implementation of all the mitigation measures, including the ATCS and the intersection mitigation measures, one intersection in the A.M. peak hour and 12 intersections in the P.M. peak hour would be significantly and unavoidably impacted under the Project with County Office Building Option. With the implementation of all the mitigation measures, including ATCS and intersection mitigation measures, no intersections in the A.M. peak hour and 7 intersections in the P.M. peak hour would be significantly and unavoidably impacted under the Project with Additional Residential Development Option.

2. **Access:** No driveway intersection approach under either Project Option would exceed LOS D. Therefore, the Project would not cause any significant traffic impacts at proposed driveway locations.

3. **Freeway/CMP Impacts.** The Project with County Office Building Option would cause two significant traffic impacts on the freeway system, one of which would occur at a CMP monitoring location (US-101 Hollywood Freeway north of Vignes Street). However, the Project with Additional Residential Development Option would cause no significant freeway traffic impacts. The Project with County Office Building Option's significant impacts on the US-101 Hollywood Freeway between Grand Avenue and Hill Street, and on the US-101 Hollywood Freeway north of Vignes Street (a CMP location) would be reduced to a less than significant level through the implementation of the proposed mitigation measures. Freeway/CMP impacts under the Project with Additional Residential Development Option would be less than significant.

4. **Transit:** Because Project transit trips would represent a very small proportion of the overall transit system capacity, it is concluded that the Project will result in a

less than significant impact to the existing transit systems serving the Project area and downtown.

5. **Civic Park:** Early evening events in the Civic Park, or events associated with concerts/programs at the Music Center and the Walt Disney Concert Hall, may worsen traffic conditions in the Project area during the P.M. peak hour. The number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. Annual events, festivals, and holiday events could also potentially have temporary and short-term (one-time) traffic impacts. Therefore, on occasion, the size of the event and other factors may cause Civic Park traffic impacts to be significant and unavoidable.

iv. Cumulative Impacts –

1. **Intersections:** The cumulative traffic impacts associated with the 93 related projects and ambient growth have been considered for the purpose of assessing the Project's traffic impacts. In conjunction with the significant Project impacts after mitigation, cumulative traffic impacts on certain intersections would be significant.
2. **Civic Park:** Early evening events in the Civic Park may worsen traffic conditions in the P.M. peak hour. The number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. As such, traffic impacts associated with such short-term activities would be considered cumulatively significant in conjunction with other projects'' traffic.
3. **Driveway Access:** None of the 93 related projects share conjoining or adjacent access points. Therefore, no significant cumulative impacts relative to access would occur since none of the related projects could cause problems in accessing the Project site. Similarly, the Project would cause no problems in the accessibility of the related projects.
4. **Transit:** The employees, visitors, and residents of the 93 related projects would use overlapping transit systems, as would be the case with the Project. Under

the City of Los Angeles transportation and land use policies, this effect is positive (i.e., the concentration of new employment and housing projects in close proximity to transit services). Further, the increased usage of transit system by users at the related projects would not cause exceedance of the capacity of existing transit systems. Consequently, the cumulative impacts relative to transit systems are concluded to be less than significant.

5. **CMP:** The Project with County Office Building Option would cause an incremental increase in the D/C ratio of 0.021 at the US-101 Hollywood Freeway between Grand Avenue and Hill Street, and an incremental increase of the D/C ratio of 0.020 at the US-101 Hollywood Freeway north of Vignes Street, both in the P.M. peak hour. Since that increase would be at or slightly above the threshold of significance, it is concluded that the Project with County Office Building Option would cause two significant traffic impacts on the freeway system, one of which would occur at a CMP monitoring location (US-101 Hollywood Freeway north of Vignes Street). Since related projects would also contribute to freeway traffic levels, the combination of the Project's traffic with the related projects' traffic is considered to be cumulatively significant. The Project with Additional Residential Development Option would not exceed D/C threshold ratios, and cumulative impacts are considered to be less than significant under this option.

c. Parking Impacts

i. Potential Impacts – The Project may create a significant parking impact if:

1. The Project would be inconsistent with adopted parking codes, parking plans, or policies.

ii. Findings – The Project will not cause significant and unavoidable parking impacts, except for the one project-specific and cumulative impact discussed in subsection iii. and iv., below. With respect to that impact, the Authority makes the following findings:

1. This impact can be mitigated to a level of less than significant if the City approves a certain land use entitlement that has been applied for by the developer,

which application is still pending as of the date of these Findings. Accordingly, the Authority finds that the measures, such changes or alterations to the Project necessary to mitigate this impact are within the responsibility and jurisdiction of another public agency and not the Authority. The Authority further finds that such measures, changes or alterations should be adopted by such other agency.

2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-B(c) is acceptable in light of the Project's overall benefits.

iii. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential parking impacts in Section IV.B of the DEIR. Under both the Project with County Office Building Option and the Project with Additional Residential Development Option, commercial and residential parking would be consistent with the parking requirements of the LAMC. However, neither Option would meet the requirements of the Deputy Advisory Agency Residential Policy (DAARP), which requires 2.5 parking spaces per dwelling unit. As part of its entitlement application to the City, the developer will be seeking approval of a variance from the DAARP. The reasons for seeking a deviation from this policy are provided in Section IV.B, Traffic, Circulation and Parking, of the DEIR. If approved by the City, there would be no significant impact for this issue. However, using a worst-case perspective, a significant and unavoidable impact in regard to this policy is assumed. Should the variance be granted by the City, which would occur only after certification of the FEIR by the Lead Agency and concurrently with action on the entitlements requested from the City, there would be no significant residential parking impacts. However, until the exception is granted, it is conservatively concluded that, for purposes of CEQA, there would be a significant impact.

The Project's total parking supply will meet projected Project demand and also exceed many of the requirements of the City's parking requirements (except for the DAARP). For example, the first phase of development on the five development parcels will provide the approximately 1,129 parking spaces which is 155 parking spaces more than that is

required by City Code. Further, an additional 381 spaces will be provided due to the use of mechanical lifts, valet operations and other parking strategies.

A minor change in the Project's parking arrangements for this first phase of development has been proposed by the developer since publication of the DEIR. This change would cause up to 227 parking spaces to be provided off-site up to two blocks from the Project site. However, there would be no significant parking impacts associated with this parking strategy. During evenings and weekends, there are sufficient spaces available in the Civic Center/Bunker Hill area as office buildings are closed. During the daytime, the most likely location sufficient spaces in the Walt Disney Hall Concert Hall garage would be available, even with the relocation of existing spaces from Parcel Q and Parcel W-1/W-2 due to the Project. Further, because these spaces would be provided within one or two blocks of Parcel Q, and because they would represent only 4% of the total Project parking supply, it is not expected that the distribution patterns of Project traffic would be significantly different from the patterns analyzed in the FEIR. Accordingly, the Authority finds that this minor potential change in the Project will not cause a significant new environmental impact.

Finally, the Project would eliminate 1,818 parking spaces (of which 1,604 are usable) in the lots existing on the five development parcels. Existing County facilities would absorb up to 1,074 of these spaces at such facilities as the Walt Disney Concert Hall garage and the Civic Center and in the Civic Center, where excess parking spaces are now available. Further, under the proposed Civic Park conceptual design plan, the Court of Flags garage (Lot 10) would be repaired and would add 325 usable parking spaces this parking supply. In addition to those available spaces, the analysis in the FEIR concluded that excess space exists in the twenty-one other parking facilities in the general vicinity of the Project Area.

iv. Cumulative Impacts – It is assumed that the related development projects would satisfy their demand for commercial and residential parking, as is the case with the Project. However, since the Project would not comply with the DAARP for residential uses, as may also be the case with one or more of the related projects, non-compliance with the DAARP is considered cumulatively significant.

## C. Aesthetics and Visual Resources

a. Visual Quality, Construction

i. Potential Impacts – The Project may cause a significant visual quality impact if:

1. The Project would substantially alter, degrade or eliminate the existing visual character of the area, including visually prominent existing features or other valued resources.
2. The Project features would substantially contrast with the visual character of the surrounding area and its aesthetic image.
3. The implementation of the Project would preclude the attainment of existing aesthetics regulations or applicable plans.

ii. Findings - A potentially significant visual quality impact due to construction of the Project is identified in the EIR. However, with the implementation of a mitigation measure, a regulatory measure, and project design features, this potentially significant impact will be reduced to a less than significant impact.

**Mitigation Measure C-1:** During Project construction, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials remain posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to construction of the Civic Park.

**Regulatory Measure C-1:** Prior to the start of each construction work phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Streetscape Program under the applicable agreements, shall prepare and implement a tree

replacement plan should mature trees along Grand Avenue be impacted by Project construction. Existing mature trees shall be replaced at a ratio of not less than 1:1, to the extent consistent with the final streetscape design. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

**Project Design Feature C-1:** Prior to the start of construction along the east side of Grand Avenue, between First and Temple Streets, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall coordinate construction of park improvements in the westerly Civic Park sector with any installation of streetscape and other improvements on Grand Avenue between First and Temple Streets to reduce the duration and visual impact of construction activities. Scheduling of construction activities for the Civic Park and the Streetscape Program shall be reviewed and approved by the Authority and shall be implemented by the responsible parties.

**Project Design Feature C-2:** Prior to the start of each construction work phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall schedule and coordinate sidewalk construction with the development of the adjacent parcels to reduce the duration and visual impact of construction activities. Scheduling of construction activities for the five development parcels, the Civic Park and the Streetscape Program shall be reviewed and approved by the Authority and implemented by the responsible parties.

iii. Supportive Evidence and Rationale – The FEIR analyzed in detail the potential visual quality impacts associated with the construction of the Project in Section IV.C of the DEIR. Construction activities may be detrimental to the aesthetic value of the Project area. In addition, the potential removal or relocation of mature landscaping in the existing Civic Center Mall in order to create the Civic Park would contrast and detract from the existing visual character of the park. Mature trees would be preserved or relocated to the extent feasible. However, construction activities that would contrast with the

aesthetic image of the area would cease at the completion of the construction phases. Due to the short-term nature of these activities, construction impacts on aesthetic resources are concluded to be less than significant. Further, the visual quality impacts generated by construction activities would be reduced to a less than significant level through the implementation of Mitigation Measure C-1, Regulatory Measure C-1, and Project Design Features C-1 and C-2.

iv. Cumulative Impact – The related projects would not be located close enough to the Project's development parcels to be within the same field of view as the Project as to create any potentially significant visual quality impact attributable to cumulative construction activities. Further, the construction of such other related projects will likely comply with the mitigation measures described in this Section XI-C(a). Therefore, this cumulative impact will be less than significant.

b. Visual Quality, Operation

i. Impacts – The Project may cause a significant visual quality impact if:

1. The Project would substantially alter, degrade or eliminate the existing visual character of the area, including visually prominent existing features or other valued resources.
2. The Project features would substantially contrast with the visual character of the surrounding area and its aesthetic image.
3. The implementation of the Project would preclude the attainment of existing aesthetics regulations or applicable plans.

ii. Findings - A less than significant visual quality impact due to operation of the Project is identified in the FEIR. However, the following regulatory measures, and a project design feature are identified in the FEIR to ensure a less than significant impact.

**Regulatory Measure C-4**: Prior to the start of each construction work phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall submit to the Authority or other appropriate agency, for review and approval, building plans and specifications that demonstrate that all ventilation, heating

and air conditioning ducts, tubes, and other such mechanical equipment shall be screened from the line-of-sight from the street. Approved building plans and specifications shall be implemented by the responsible parties.

**Regulatory Measure C-5**: Prior to the start of each construction work phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall submit design plans that demonstrate that all utility lines and connections are constructed underground. Approved utility plans and connections with regard to the five development parcels shall be reviewed and approved by the Authority, whereas the City's Department of Building and Safety or other appropriate City agency or department, shall review and approve with regard to the Streetscape program. Approved utility lines and connections shall be implemented by the responsible parties.

**Regulatory Measure C-6**: Prior to construction, the developer, with regard to the five development parcels, shall submit design plans for trash collection areas to the Authority for review and approval. Trash collection areas shall be screened from line of sight from the street. Approved design plans shall be implemented by the developer.

**Project Design Feature C-3:** Prior to the start of each construction work phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare architectural plans that shall be reviewed and approved by the Authority such that all ground-level building fixtures, including, but not limited to, security gates, landscape light fixtures, pedestrian lights, air intake shafts, and other appurtenances are integrated into the architectural theme and/or design of the respective Project components. Approved architectural plans shall be implemented by the developer and the responsible parties.

iii. Supportive Evidence and Rationale – The FEIR discusses the less than significant visual quality impact caused by Project operations in Section IV.C of the DEIR. The Grand Avenue streetscape program would improve the aesthetic quality and ambience of Grand Avenue and would create an appealing

pedestrian environment. Existing visual and pedestrian access into the Civic Park would be improved and the extension of the Civic Park to Spring Street would enhance the aesthetic context of Los Angeles' City Hall. The Project's towers would contribute to the visual continuity of the tall and varied structures comprising the City's skyline and would be consistent with the aesthetic components that represent downtown's aesthetic image. The Project is anticipated to be consistent with the urban design policies that call for the shaping of a skyline that parallels and accentuates the topography of Bunker Hill, the integration of street-front retail with the streetscape, and the addition of public art into the Grand Avenue right-of-way. As such, the Project's visual quality impacts would be less than significant.

iv. Cumulative Impacts - The related development projects identified in the FEIR as Nos. 9, 27, 88, and 92 are located in close proximity to the Project site and, as such, have the potential to cumulatively contribute to the visual quality of the area. It is anticipated, however, that all of the related projects would be constructed with high-quality materials and architectural design and would be consistent in scale with the surrounding buildings. In addition, it is anticipated that the related projects would contribute to sidewalk and streetscape improvements and, therefore, would improve the visual quality of the downtown area. Therefore, cumulative impacts relative to the aesthetics and visual quality would be less than significant.

c. Views

i. Impacts – The Project may cause a significant impact if:

1. Project development would substantially obstruct an existing view of a visually prominent resource as viewed from a public street, sidewalk, park, community cultural center, trail, public vantage point, or residential use.

ii. Findings – The Project would cause significant and unavoidable view impacts (1) to the residents' views from the Grand Promenade Tower residential building; (2) the view from Olive Street; and (3) to the residents' view from the Museum Tower residential building. These three view impacts are identified in the FEIR, and the Authority makes the following findings for these impacts:

1. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-C(c) is acceptable in light of the Project's overall benefits.
2. No feasible mitigation measures exist to mitigate these significant view impacts. The issue of project alternatives that may mitigate those view impacts is addressed in Section XI-C(c) of these Findings.

iii. Supportive Evidence and Rationale – The FEIR discusses the significant and unavoidable view impacts in Section IV.C. The Project would obstruct views of the Walt Disney Concert Hall and distant vistas to the north, possibly including the San Gabriel Mountains, from the Grand Promenade Tower, a 28-story residential building located immediately south of Parcel M-2. Development on Parcels W-1/W-2 would substantially block views of City Hall from Olive Street, a public street, under both Project Options. In addition, development on Parcel Q would block distant vistas to the north, possibly including the San Gabriel Mountains, from the upper stories of the Museum Tower residential building located south of Parcel Q and east of MOCA. Therefore, view impacts on the Grand Promenade Tower, Olive Street, and Museum Tower would be significant. There are no feasible mitigation measures to reduce the significant and unavoidable view impacts to the Promenade Tower, the view from Olive Street, and the view from the Museum Tower. As described in Section XII of these Findings, certain elements of Alternative No. 4 avoid the significant view impact to the residents' views from the Grand Promenade Tower.

iv. Cumulative Impacts - Related project No. 88 will be located to the east of Angelus Plaza and would potentially block some easterly views from the existing Angelus Plaza residential use toward Los Angeles City Hall. The blockage of views of City Hall would be considered potentially significant, and since the development in parcels W-1 and W-2 would also block views of City Hall from Olive Street, cumulative impacts relative to the views of City Hall are found to be significant.

d. Light and Glare

i. Potential Impacts – The Project may cause a significant impact if:

1. Lighting would alter the character of the off-site areas surrounding the Project; or
2. Lighting would substantially interfere with the performance of an off-site activity.

ii. Findings – A potential significant glare impact from reflected light on building surfaces is identified in the EIR. However, this potential significant impact will be reduced to a level of less than significance with the implementation of two identified mitigation measures and one regulatory measure.

**Mitigation Measure C-2**: Prior to the start of each construction work phase, the developer, with regard to the five development parcels, shall submit a design plan and technical analysis prepared by the Project's architect as part of the building permit submission that demonstrates that the final selection of building materials for the five development parcels shall not create a significant glare impact on any offsite sensitive uses, including line-of-sight glare on any street or commercial, residential, or cultural use. The approved design plan shall be implemented by the developer with regard to the five development parcels. The design plan and technical study shall be reviewed and approved by the Authority.

**Mitigation Measure C-3**: Prior to each construction phase, the developer with regard to the five development parcels, shall prepare, and, thereafter, implement plans and specifications to ensure that architectural lighting is directed onto the building surfaces and have low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

**Regulatory Measure C-3**: Prior to the completion of final plans and specifications, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare lighting plans and specifications for the design type of light fixtures, height of light standards, and orientation of light fixtures and standards within the public right-of-way to ensure that all light fixtures do not interfere with the activities occurring within these areas. Lighting plans with regard to the Streetscape Program shall be submitted to the City's

Department of Building and Safety or other appropriate City agency or department, for review and approval. Lighting plans with regard to the Civic Park shall be submitted to the County CAO or its designee for review and approval. Approved lighting plans shall be implemented by the responsible parties.

iii. Supportive Evidence and Rationale – The FEIR analyzed in detail the potential glare impact from reflected light on building surfaces in Section IV.C of the DEIR. The Project would increase ambient light and artificial glare through the implementation street lighting, illuminated signs, architectural lighting, light spillage from the windows of high-rise buildings, special events lighting and security lighting. Since the Project's lighting would be similar to adjacent businesses (i.e., the nearby residential and office towers), it would not significantly impact the environment, which is currently characterized by high levels of ambient light. The increase in ambient light and artificial glare would not be great enough to interfere with activities at nearby residential, office and cultural uses. Natural sunlight reflected from building surfaces and windows have the potential to create glare. Further, special events lighting in the Civic Park has the potential to create a significant impact. However, with the implementation of Mitigation Measures C-2 and C-3, the potential light and glare impacts associated with special events lighting and reflected sunlight would be reduced to less than significant levels.

iv. Cumulative Impact – The Project and 93 related projects would increase ambient light in downtown Los Angeles. However, the context of the downtown environment, illuminated signage associated with street front retail uses and restaurants would not substantially alter the character of the surrounding area. The related projects Nos. 27 and 92, which are located in the same line-of-sight as the Project, as viewed from adjacent westbound and northbound streets, respectively, have the potential to contribute to glare impacts. With the implementation of the recommended mitigation measures, which require a technical glare analysis of, and, if necessary, modification to, the Project's building materials, the Project's potentially significant glare impact would be reduced to a less than significant level. Since it is assumed that the related projects would be subject to the same measure

concerning their potential glare impacts, cumulative impacts would be less than significant.

e. Shade and Shadow

i. Potential Impacts – The Project may cause a significant shade/shadow impact if:

1. The Project would shade currently unshaded off-site, shadow-sensitive uses more than three hours between the hours of 9:00 A.M. and 3:00 P.M. PST, between late October and early April, or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. PDT between early April and late October.

ii. Findings – A less than significant shade/shadow impact is identified in the FEIR. No mitigation measures are identified for this impact.

iii. Supportive Evidence and Rationale – The Project's potential shade/shadow impact is analyzed in detail in Section IV.C of the DEIR. During certain seasons, the Project's towers have the potential to shade sensitive offsite uses, including the future Central Los Angeles Performing Arts Senior High School (currently under construction), the Bunker Hill Towers open space, and Angelus Plaza, depending on the season and hour of the day. However, shading would not exceed three hours between the hours of 9:00 A.M. and 3:00 P.M. during the winter solstice or spring equinox, or four hours between the hours of 8:00 A.M. and 5:00 P.M. during the summer solstice or fall equinox. Accordingly, the Project would have a less than significant shade/shadow impact.

iv. Cumulative Impact - The combined morning shading from the Project and related project Nos. 9 and 27, with shading later in the day from related project No. 88, would create a potentially significant shade/shadow impact on the Angelus Plaza site, during the summer solstice only. No feasible mitigation measures exist for this cumulative impact due to the proposed location of these related projects. Although related project No. 92 would generate considerable shading of the Angelus Plaza site, substantially shading from related project No. 92 is not anticipated during the summer solstice. No other related projects would contribute to cumulative shading impacts.

## D. Historical Resources

a. Impacts – The Project may cause a significant historical resources impact if:

i. The Project will cause a substantial adverse change in the significance of a historical resource. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

b. Findings – The Project will cause significant and unavoidable historical resources impact on a project-specific and cumulative basis. The Authority makes the following findings for this impact:

i. All feasible measures, changes and alterations have been required in, or incorporated into, the Project, which will lessen such significant environmental effects.

ii. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-D is acceptable in light of the Project's overall benefits.

Although the following mitigation measures aimed at reducing this significant and impact to historical resources have been adopted, these mitigation measures will not reduce this significant impact to a level of insignificance:

1. **Mitigation Measure D-1: Potential Los Angeles Civic Center Historic District.** Prior to the start of each construction phase, the responsible parties for implementation of the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the potential Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following measures:

a. **Grand Avenue Streetscape Program Design Features.** If the Streetscape Program is implemented in substantial conformance to that set forth in the Project's Conceptual Plan, then the following mitigation measure is not required since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape

improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then the landscape and hardscape features proposed as part of the Grand Avenue Streetscape Program shall respect the linear qualities of the street and sidewalks in respect to the adjacent historic resource. Such landscape treatments shall be unified and planted in a manner as to not obscure the sight lines to the facades of those properties identified as contributors to the potential Los Angeles Civic Center Historic District from the public right-of-ways. The design of the Project's streetscape improvements shall consider their height, width, and spatial placement and include a program of selective pruning of trees to retain sight lines on a regular basis.

2. **Mitigation Measure D-2: Music Center:** No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then prior to the start of each construction phase, the entity responsible for implementing the Project's streetscape program under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potential eligibility of the Music Center are reduced to the maximum extent practicable through implementation of the following mitigation measure:

   a. Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the streetscape improvements does not materially alter the Music Center's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings.

3. **Mitigation Measure D-3: Cathedral of Our Lady of the Angels.** No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that

set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then prior to the start of each construction phase, the entity responsible for implementing the Project's streetscape program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Cathedral of Our Lady of the Angels are reduced to the maximum extent practicable through implementation of the following mitigation measure:

a. Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the streetscape improvements does not materially alter the Cathedral of Our Lady of the Angels' potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

4. **Mitigation Measure D-4: Kenneth Hahn Hall of Administration.** No mitigation measures are required if the final design for the Civic Park and the Grand Avenue streetscape improvements are in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park and the streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Kenneth Hahn Hall of Administration as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

a. Prior to implementation, the final design plans for the Civic Park and the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final designs for the Civic Park and streetscape improvements do not materially alter the Kenneth Hahn Hall of Administration's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards. The County's CAO or its designee shall determine compliance for the Civic Park and the City's Department of Building and Safety shall determine compliance for the Streetscape Program.

5. **Mitigation Measure D-5: Civic Center Mall (El Paseo de los Pobladores de Los Angeles).** Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Civic Center Mall for listing in the California Register is reduced to the maximum extent practicable. However, in the event that any one or more of the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes, then the Standards shall be utilized to ensure that rehabilitation work to the four character-defining features of the park referenced in this Mitigation Measure D-5 does not impair the historic characteristics that convey the Civic Center Mall's historical significance as an individual resource and as a contributing property to the potentially eligible Los Angeles Civic Center Historic District. If such compliance with such Standards cannot be achieved, then the following measures shall apply to the applicable character-defining features identified in this Measure:

a. **Recordation.** Prior to the issuance of a demolition permit for the Civic Center Mall and its associated features, a Historic American Building Survey (HABS) Level II-like recordation

document shall be prepared for the Civic Center Mall. A qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History shall prepare this document. The HABS-like document shall record the existing landscape and hardscape features of the Civic Center Mall, including the four character-defining features identified in this measure. The report shall also document the history and architectural significance of the property and its contextual relationship with the surrounding civic buildings and environment. Its physical composition and condition, both historic and current, should also be noted in the document through the use of site plans, historic maps and photographs, and large-format photographs, newspaper articles, and written text. A sufficient number of large-format photographs shall be taken of the resource to visually capture its historical and architectural significance through general views and detail shots. Field photographs (35mm or digital format) may also be included in the recordation package. All document components and photographs should be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Archival copies of the report, including the original photographs, shall be submitted to the California Office of Historic Preservation and the Huntington Library. Non-archival copies of the report and photographs shall be submitted to the County of Los Angeles, the City of Los Angeles Planning Division, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy Modern Committee.

b. **Salvage and Reuse of Key Park Features.** Prior to the removal of the four character-defining features identified in this Measure, an inventory of significant landscape and hardscape elements shall be made by a qualified preservation consultant and landscape architect. Where feasible, these materials and elements shall be itemized, mapped, photographed, salvaged, and incorporated into the new design of the park, wherever possible. To the extent salvageable materials cannot be reused on-site, they shall be disposed of in accordance with applicable county surplus procedures.

6. **Mitigation Measure D-6: Hall of Records.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Hall of Records building as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

   a. Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Hall of Records' potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Building.

7. **Mitigation Measure D-7: Court of Flags.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potential eligibility of the Court of Flags as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

a. Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Court of Flag's potential historic significance. This evaluation shall be conducted in accordance with the Secretary to Interior's Standards.

8. **Mitigation Measure D-8: Clara Shortridge Foltz Criminal Justice Center.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Clara Shortridge Foltz Criminal Justice Center as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

   a. Prior to implementation the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park does not materially alter the Clara Shortridge Foltz Criminal Justice Center's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

9. **Mitigation Measure D-9: Los Angeles City Hall.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However,

should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to those historic characteristics that make the Los Angeles City Hall building historically significant as a designated resource and as a contributing property to the potentially eligible Los Angeles Civic Center Historic District, are reduced to the maximum extent practicable through implementation of the following mitigation measure:

a. Prior to implementation the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the historic significance of the Los Angeles City Hall. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

10. **Mitigation Measure D-10: Los Angeles County Law Library.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the potentially eligible Los Angeles County Law Library as a contributing property to the Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

a. Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Los Angeles County

Law Library's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

11. **Mitigation Measure D-11: Los Angeles County Courthouse.** No mitigation measures are required if the final design for the Civic Park and the Grand Avenue streetscape improvements are in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park and the streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Los Angeles County Courthouse as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

    a. Prior to implementation, the final design plans for the Civic Park and the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed final designs for the Civic Park and streetscape improvements do not materially alter the Los Angeles County Courthouse's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards. The County's CAO or its designee shall determine compliance for the Civic Park and the City's Department of Building and Safety shall determine compliance for the Streetscape Program.

12. **Mitigation Measure D-12: Southern California Edison (One Bunker Hill) Building.** No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Standards. However, should the final design for the Grand Avenue streetscape improvements are not implemented in

substantial conformance with the Project's Conceptual Plan, the responsible parties for implementation of the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the historic characteristics that convey the Southern California Edison building's (One Bunker Hill) significance are reduced to the maximum extent practicable through implementation of the following mitigation measure:

a. Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the proposed streetscape improvements does not materially alter the Southern California Edison's (One Bunker Hill) Building's historic significance. This evaluation shall be conducted in accordance with Secretary of the Interior's Standards.

c. Supportive Evidence – The FEIR identifies a significant and unavoidable historical resources impact in Section IV.D of the DEIR. Under CEQA, implementation of the recommended mitigation measures would reduce all of the identified significant impacts to a less than significant level, with the exception of one impact associated with the Civic Center Mall. The Mall is individually eligible for listing on the California Register of Historic Resources and would be a contributory feature of the Civic Center since the Center is eligible as a California Register Historic District. The actual extent of that significant impact is dependent upon the Civic Park's final design. Significant impacts to the Park would result if one or more the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. The Standards should be utilized to ensure that rehabilitation work for the Civic Park does not impair those qualities

and historic characteristics of these four key character-defining features. If these character-defining features were retained and reused in a manner consistent with the Standards as discussed in the EIR, then a significant impact to this resource would not occur. However, since the final design of the Park has not been completed, and, therefore, consistency with the Standards is not known at this time, it is conservatively assumed that a significant impact will occur.

Based on the analysis in the FEIR, the Authority finds that the Civic Mall is not eligible for listing in the National Register of Historic Places since the necessary criteria for such a listing are not satisfied. However, during the public review process, a comment was raised as to the need for the Civic Center Mall to be listed in the National Register in addition to the California Register of historic resources. For CEQA purposes, a resource need only be recognized at the local or state level in order to be afforded full protection as a historical resource. Thus, whether the Civic Center Mall is listed in the National Register or the California Register, it would be afforded the same protections. Accordingly, the Authority finds that there is no additional impact associated with the Civic Mall's potential eligibility for the National Register.

d. Cumulative Impacts - The development of one or more related projects in the downtown area has the potential to affect listed or eligible historical resources. Each of the related projects having the potential to impact historical resources would be subject to CEQA review and it is anticipated that any potential impacts on historical resources would be addressed and reduced to less than significant levels through the CEQA process. However, as the Project may result in a potentially significant impact with regard to the Civic Center Mall on an individual basis as well as a contributor to the potential Civic Center historic district, the Project and the related projects may also have the potential to cause a significant cumulative impact on historical resources.

## E. Population, Housing and Employment

a. Potential Impact – The Project may cause a significant impact with regard to population, housing and employment if:

i. The Project would cause population or housing growth in Southern California Association of Governments ("SCAG") City of Los Angeles subregion to exceed SCAG's 2015 projections

ii. The Project would cause growth that is not compatible with adopted population and housing policies, including jobs/housing balance, as set forth in the Central City Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide (RCPG).

b. Findings – The Project will not cause a significant impact with regard to population, housing and employment.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impacts associated with population, housing and employment in Section IV-E of the DEIR. .Project development would not exceed SCAG's adopted projections for the City of Los Angeles Subregion. The Project would also be consistent with adopted policies, including jobs/housing balance, as set forth in the Central City Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide. Therefore, the Project would result in less than significant environmental impacts to housing, employment and population. Thus, no mitigation measures are required.

d. Cumulative Impact – Additional growth from the 93 related projects would generate 28,952 estimated residents and 61,158 estimated employees. When combined with the Project with County Office Building Option, the estimated population growth would be 31,877 residents and 65,364 employees. Under the Project with Additional Residential Development Option, cumulative population growth would be 32,729 residents and 62,364 employees. According to SCAG forecasts for the City of Los Angeles Subregion, cumulative growth under both Project Options would represent approximately 18 percent of the forecasted residential growth and 29 percent of the forecasted employment growth. This level of cumulative growth would not exceed projections and would therefore be less than significant. The related projects are also anticipated to be consistent with SCAG and Los Angeles policies for development of the downtown area as a dense activity center and, as such, would not cause a significant cumulative impact in this area.

## F. Air Quality

a. Air Quality, Project Construction

i. Impacts – The construction of the Project may cause a significant and unavoidable air quality impact if:

1. The Project's emission of "regional" air pollutants from both direct and indirect sources would exceed any of the following South Coast Air Quality Management District ("SCAQMD") prescribed threshold levels: (1) 75 pounds per day (lbs/day) for VOC; (2) 100 lbs/day for NOx; (3) 550 lbs/day for CO; and (4) 150 lbs/day for PM10 or SOx.

2. Project-related fugitive dust and construction equipment emissions cause an incremental increase in localized PM10 concentrations of 10.4 $\mu g/m^3$ or cause a violation of NO2 or CO ambient air quality standards.

ii. Findings – A significant and unavoidable air quality impact caused by construction of the Project will occur on a project-specific and cumulative basis. The Authority makes the following findings for this impact:

1. All feasible measures, changes and alterations have been required in, or incorporated into, the Project, which will lessen such significant environmental effects.

2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-F(a) is acceptable in light of the Project's overall benefits.

Although the following mitigation measures aimed at reducing these significant and unavoidable air quality impacts associated with Project construction have been adopted, these mitigation measures will not reduce those significant impacts to a level of insignificance:

**Mitigation Measure F-1:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. The City's Department of Building and Safety, or other appropriate City agency or department,

shall determine compliance with SCAQMD Rule 403 during construction with regard to construction associated with the five development parcels and the Grand Avenue Streetscape Program. The County's CAO or its designee shall determine compliance with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of non-compliance. Compliance with the applicable provisions of Rule 403 shall include, but not be limited to, using best available control measures listed in Table 1 of Rule 403 to minimize fugitive dust emissions from each fugitive dust source type within active operations, and will include at least the following specific best management practices (BMPs):

i. Water soils daily and not more than 15 minutes prior to earth moving activities;

ii. Water surfaces two times per day or more in order to maintain a surface crust to prevent soil erosion

iii. Apply soil conditioners or vegetative cover to areas that will be exposed for an extended duration:

iv. Apply chemical stabilizers within five working days of ceasing grading;

v. Install of approved trackout prevention devices and provide street sweeping within the Project area:

vi. Securely cover truck loads with a tarp;

vii. Cease grading activities when wind speeds exceed 25 miles per hour; and

viii. Permanently seal exposed surfaces as soon as possible after grading is finished.

ix. Provide temporary wind fencing, consisting of wrapped chain links or solid fencing, around the sites that are being graded/excavated to reduce dirt/dust from being blown over to adjoining properties.

**Mitigation Measure F-2:** During each construction phase, the developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of non-compliance.

**Mitigation Measure F-3:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the

applicable agreements, shall comply with SCAQMD Rule 402 to reduce potential nuisance impacts due to odors from construction activities. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure if it is not being complied with.

**Mitigation Measure F-4:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all haul truck tires shall be cleaned at the time these vehicles exit the Project site. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of non-compliance.

**Mitigation Measure F-5:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all export material carried by haul trucks shall be covered by a tarp or other means. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of non-compliance.

**Mitigation Measure F-6:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or

its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-7:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that construction equipment is maintained and operated so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn off their engines, when not in use, to reduce vehicle emissions. Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction activities associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-8:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that electricity rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-9:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-10:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that heavy-duty construction equipment shall use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible. The City's Department of Building and Safety, or other

appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-11:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that shuttle service shall be provided to construction workers who are required to park in offsite parking lots if such lots are not within a walking distance of 1100 feet from the respective construction sites. CRA/LA shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-12:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall equip major earth moving equipment, haul trucks, and excavation equipment with particulate filters and catalytic converters. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure F-3:** During each construction phase, the developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall ensure that building materials, architectural coatings and cleaning solvents shall comply with all applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park. The SCAQMD shall be responsible for the enforcement of this measure for all Project components in the case of non-compliance.

iii. Supportive Evidence and Rationale – The FEIR discusses the Project's potentially significant air quality impacts in Section IV.F of the DEIR. With implementation of the above regulatory measures and mitigation measures, heavy-duty construction equipment emissions would be reduced by a minimum of 5 percent and fugitive dust emissions would be reduced by an additional 16 percent. However, regional construction activities would still exceed the SCAQMD daily emission thresholds for regional $NO_x$, CO and VOC after implementation of all feasible mitigation measures. Therefore, construction of the Project would have a significant and unavoidable impact on regional air quality. Construction activities would also still exceed the SCAQMD daily localized emission threshold for $PM_{10}$ and $NO_2$ after implementation of all feasible mitigation measures. Therefore, construction of the Project would also have a significant and unavoidable impact on localized emissions.

iv. Cumulative Impact - Buildout of those related development projects identified in the FEIR that would be constructed within a similar time frame as the Project would increase short-term emissions for concurrent activities during the Project's construction period. Since emissions of criteria pollutants under peak construction activities are concluded to be significant, any additional construction activities as part of any related project occurring during this time and in the vicinity of the Project site would be adding additional air pollutant emissions to these significant levels. As a result, a significant and unavoidable cumulative impact with respect to construction emissions would occur.

b. Air Quality, Project Operation

i. Potential Impacts –Project operations may cause a significant air quality impact if:

1. Operation emissions exceed any of the daily thresholds presented below:

| Pollutant | Significance Threshold (lbs/day) |
|---|---|
| VOC | 55 |
| NOx | 55 |
| CO | 550 |
| PM10 | 150 |
| SOx | 150 |

ii. Findings – A significant and unavoidable air quality impact caused by Project operations will occur on a project-specific and cumulative basis. The Authority makes the following findings for this impact:

1. All feasible measures, changes and alterations have been required in, or incorporated into, the Project, which will lessen such significant environmental effects.
2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-F(b) is acceptable in light of the Project's overall benefits.

Although the following mitigation measures aimed at reducing these significant and unavoidable air quality impacts during Project operations have been adopted, these mitigation measures will not reduce those significant impacts to a level of insignificance:

**Mitigation Measure F-13:** During Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall, to the extent feasible, ensure that deliveries are scheduled during off-peak traffic periods to encourage the reduction of trips during the most congested periods. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure, with regard to construction associated with the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-14:** During Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall coordinate with the MTA and the LADOT to provide information to Project employees, residents and guests with regard to local bus and rail services. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure F-15:** Provide the appropriate number of bicycle racks located at convenient locations in the Project site. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park, under the

applicable agreements, shall implement these measures prior to the completion of each construction phase. The City's Department of Safety shall review and approve the number and location of the bicycle racks with regard to the five development parcels. The County's CAO or its designee shall perform the same function with regard to the Civic Park.

**Mitigation Measure F-16:** During on-going Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall ensure that all fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed, but a minimum level of lighting should be provided for safety. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this mitigation measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure F-1:** During Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall ensure that all point source facilities shall obtain all required permits from the SCAQMD. The issuance of these permits by the SCAQMD shall require the operators of these facilities to implement Best Available Control Technology and other required measures that reduce emissions of criteria air pollutants. Proof of permit issuance by the SCAQMD shall be provided to the City's Department of Building and Safety, or other appropriate City agency or department, with regard to the five development parcels, and the County's CAO or its designee with regard to the Civic Park. Compliance with point source permits shall be enforced by the SCAQMD for all Project components.

**Project Design Feature F-3:** During Project operations, the developer, with regard to the five development parcels, shall ensure that commercial businesses located within the Project site shall be limited to those that do not emit high levels of potentially toxic air contaminants or odors (e.g., dry cleaners with on-site processing plants that handle toxic chemicals). The City's Department of Building and Safety, or other appropriate City agency or department, shall be responsible for the enforcement of this measure with regard to the five development parcels.

iii. Supportive Evidence and Rationale – The FEIR discusses the Project's potentially significant air quality impacts in Section IV.F of the DEIR. As with the analysis of air quality impacts due to construction of the Project, the analysis used to determine the air quality impacts attributable to Project

operations employed protocol established by the SCAQMD. Potential impacts associated with the CO hot spots, toxic air contaminants, and regional air pollutants were analyzed in the FEIR. The analysis conservatively assumed that if any "screening" threshold set by the SCAQMD would be exceeded, then a significant impact would occur. Further, it was assumed that such an impact applied to the entire community surrounding the Project area, and, accordingly, no particular group of sensitive receptors was excluded. Under that analysis, operational emissions of "regional" air pollutants from the Project would exceed the SCAQMD daily emission threshold for regional CO, VOC, $PM_{10}$, and $NO_x$ after implementation of all feasible mitigation measures. Therefore, operation of the Project would have a significant and unavoidable impact on regional air quality. In addition, regional operational emissions would still exceed SCAQMD daily thresholds for CO, VOC, $PM_{10}$, and $NO_x$ after implementation of all feasible mitigation measures. Therefore, operation of the Project would have a significant and unavoidable impact on regional air quality.

During the public review process, a comment was raised regarding the inclusion of a mitigation measure that would encourage water-based coatings or coatings with a lower volatile organic compound (VOC) content than 100 grams per liter. In addition, the comment suggested the mitigation measure restrict the number of gallons of coatings used per day and mandate the use of materials that do not need to be painted, or that can be painted and, then, transported to the site. This mitigation measure, however is not necessary since Rule 1113 of the South Coast Air Quality Management District (SCAQMD) already applies to this issue. The SCAQMD imposes the strictest rules in the nation with regard to the application of architectural paints and coatings. District Rule 1113 restricts VOCs in virtually all types of paints and coatings, including but not limited to, wood finishes, lacquers, concrete-curing compounds, fire-proofing exterior coatings, paints, floor coatings, coatings for signs, mastic coatings, roof coatings, rust preventative coatings, stains, swimming pool coatings, wood preservatives, and water-proofing sealers. This rule reflects the most stringent industry-wide standards achievable in practice. Accordingly, and for the reasons stated in the FEIR,

the Authority finds that such a mitigation measure is infeasible.

iv. Cumulative Impact – Implementation of the Project would result in an increase in ongoing operational emissions, which would contribute to region-wide emissions on a cumulative basis. Accordingly, the Project's cumulative air quality impacts are also concluded to be significant. In such cases, the SCAQMD recommends that all projects, employ all feasible mitigation measures, which has been done with regard to the Project.

## G. Noise

a. Construction, Noise

i. Impacts – The construction of the Project may cause a significant noise impact if:

1. Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use;
2. Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6 P.M. on Saturday, or at anytime on Sunday.

ii. Findings – The Project will cause a significant and unavoidable noise impact during construction of the Project on a project-specific and cumulative basis. The Authority makes the following findings for this impact:

1. All feasible measures, changes and alterations have been required in, or incorporated into, the Project on a project-specific and cumulative basis, which will lessen such significant environmental effects.
2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-G(a) is acceptable in light of the Project's overall benefits.

Although the following mitigation measures aimed at reducing these significant and unavoidable noise impacts associated with Project construction have been adopted, these mitigation measures will not reduce those significant impacts to a level of insignificance:

**Mitigation Measure G-1**: To reduce any impact on nearby venues that may be noise sensitive receptors, such as the Music Center, Disney Concert Hall, and the County Courthouse, the following Measures G-1 and G-2 shall be implemented as follows: During each construction phase, the developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall limit (i) construction activities utilizing heavy equipment to Monday through Friday from 7:00 a.m. to 8:00 p.m., and (ii) interior construction work inside building shells and construction activities not utilizing heavy equipment to 7:00 a.m. to 9 p.m. Monday through Friday. Saturday construction shall be limited to 8:00 a.m. to 6 p.m. No exterior construction activities shall be permitted on Sundays or holidays per applicable City regulations. Construction noise measures shall also be implemented, which may include the use of noise mufflers on construction equipment used within 100 feet of these buildings. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure G-2**: During each construction phase, the developer, with regard to the five development parcels and the responsible parties for implementation of the Streetscape Program shall not use heavy equipment within (to the maximum extent practicable) 100 feet of the County Courthouse building while Court is in session. Construction contracts must specify that all construction equipment shall be in proper operating condition and fitted with standard factory silencing features and other applicable attenuation devices such as mufflers. The City's Department of Building and Safety or other appropriate City agency or department shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure G-3**: During the initial stage of each construction phase (site demolition and site preparation/excavation) for each Project parcel and when construction activities are within 200 feet of noise sensitive land uses, the developer, with regard to the five development parcels, shall erect a temporary, 8-foot, ½-inch-thick plywood fence along the boundaries or each construction site adjacent to noise sensitive uses

such that the "line of sight" between on-site construction activities and the residential or other sensitive uses is blocked, where feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels.

**Mitigation Measure G-4**: During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that pile drivers within the individual activity/development site under construction at that time shall be equipped with noise control devices having a minimum quieting factor of 10 dBA. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure G-5**: During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall, except as otherwise permitted by applicable agreements, ensure that construction loading and staging areas shall be located on the Project site within each respective construction site and away from noise-sensitive uses to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure G-6**: Prior to the issuance of grading permits for each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications that include a requirement to route pedestrians (to the maximum extent practicable) 50 feet away from the construction area when heavy equipment such as hydraulic excavators are in use. Such routing may include the posting of signs at adjacent intersections. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Mitigation Measure G-7:** During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for

implementation of the Civic Park and Streetscape Program under the applicable agreements, shall designate a construction relations officer to serve as a liaison with surrounding property owners who is responsible for responding to any concerns regarding construction noise. The liaison shall coordinate with the Project construction manager(s) to implement remedial measures in the shortest time feasible. The liaison's telephone number(s) shall be prominently displayed at multiple locations along the perimeter of each construction site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

iii. Supportive Evidence and Rationale – The FEIR discusses the Project's potentially significant construction noise impacts in Section IV.G of the DEIR. The noise reduction measures prescribed in Mitigation Measure G-1 would achieve a minimum 5-dBA reduction along areas of sensitive receptors where the line-of-sight to ground-level construction activity that occurs on the Project site is broken. Regulatory Measure G-1 would preclude construction-period noise impacts from occurring during the noise-sensitive night time periods, or at any time on Sundays or holidays. In addition, the use of heavy construction equipment shall cease one hour earlier than otherwise allowed under City Code. Noise level reductions attributable to Mitigation Measures G-2 and G-3, and G-4, G-5, and G-6 (e.g., use of noise mufflers and on-site storage of construction equipment) are not easily quantifiable, but implementation of such measures would reduce the noise level impact associated with construction activities to the extent feasible. Further, construction noise from earthmoving equipment will be reduced since most of such equipment will sink below a surrounding soundwall as excavation proceeds during construction. Nevertheless, Project construction activities would intermittently increase the daytime noise levels at nearby sensitive land uses during construction activities by more than the 5-dBA significance threshold. As such, noise impacts during construction are concluded to be significant and unavoidable.

iv. Cumulative Impact – Noise impacts during construction of the Project and each related development project (that has not already been built) would be limited to the duration of construction and would be localized. In addition, it is

anticipated that each of the related projects would comply with the applicable provisions of the City's noise ordinance, as well as mitigation measures that may be prescribed by the City that require significant impacts be reduced to the extent feasible. However, since noise impacts due to construction of the proposed Project would be significant on its own, it is conservatively concluded that noise impacts due to construction of the Project in combination with any of the related projects would also be significant.

b. Operational Noise

i. Potential Impacts – The Project's operations may cause a significant impact if:

1. The Project causes the ambient noise level measured at the property line of affected uses to increase by 3dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category or by 5dBA in CNEL within the "normally acceptable" or "conditionally acceptable" category.
2. Project-related operational (i.e., non-roadway) noise sources increase ambient noise by 5 dBA, thus causes a violation of the City's Noise Ordinance.

ii. Findings – The potentially significant noise impact attributable to Project operations will be mitigated to a level of less than significance with the implementation of Mitigation Measure G-8:

**Mitigation Measure G-8**: The developer, with regard to the five development parcels, shall prepare and implement building plans that ensure prior to the start of each construction phase which includes residential development, that all exterior walls, floor-ceiling assemblies (unless within a unit), and windows having a line of sight (30 degrees measured from the horizontal plane) of Grand Avenue, Hill Street, Hope Street, First Street, and Second Street of such residential development shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a lab-tested Sound Transmission Class of 30, subject to field testing, as defined in UBC Standard No. 35-1, 1982 edition. Sign off by the City's Department of Building and Safety, or other appropriate City agency or department, shall be required prior to obtaining a building permit. The developer, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound simulation

satisfactory to the City's Department of Building and Safety, or other appropriate City agency or department. Examples of alternative means may include, but are not limited to, the following: (1) acoustical seals for doors and windows opening to the exterior; (2) consideration of the type, location, and size of windows; and (3) sealing or baffling of openings and vents. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

iii. Supportive Evidence and Rationale – The FEIR discusses the Project's potential noise impact attributable to Project operations in Section IV.G of the DEIR. Project development would not result in any significant noise impacts to off-site receptors during long-term Project operations. With implementation of Mitigation Measure G-8, on-site residents would not be exposed to inappropriately high noise levels from off-site activities (e.g., vehicle traffic on adjacent roadways), and thus the potential noise impact caused during Project operations will be less than significant.

iv. Cumulative Impact – Cumulative traffic volumes would result in a maximum increase of 2.5 dBA CNEL along Second Street, between Grand Avenue and Olive Street. As this noise level increase would be below the 3 dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant. Los Angeles Municipal Code limits stationary-source noise from items such as roof-top mechanical equipment and emergency generators, would maintain noise to less than significant levels at the property lines of the related projects. Therefore, on-site noise produced by any related project would not be additive to Project-related noise levels. Accordingly, cumulative stationary-source noise impacts attributable to cumulative development would also be less than significant.

## H. Hazards and Hazardous Materials

a. Potential Impacts – The Project may a significant impact with regard to hazards and hazardous materials if:

i. Project activities would involve the disturbance, removal, storage, or disposal of hazardous materials; or

ii. The Project would expose people or structures to substantial risk resulting from the release of a hazardous material, or

from exposure to a health hazard, in excess of regulatory standards.

b. Findings – The Project will not cause a significant impact with regard to hazards and hazardous material. Notwithstanding, the following regulatory measures have been identified to ensure the Project's less than significant impact concerning this issue:

**Regulatory Measure H-1**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall properly decommission all unused groundwater monitoring wells, per applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The Regional Water Quality Control Board shall enforce compliance with this measure.

**Regulatory Measure H-2**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall test for the presence or absence of hydrogen sulfide and methane beneath the site by subsurface sampling. Should the sampling result in the discovery of hydrogen sulfide and/or methane, appropriate health and safety measures shall be implemented, in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

**Regulatory Measure H-3**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall take fill samples from each of the five parcels, and shall analyze these samples for contaminants at elevated concentrations. Should elevated contaminant concentrations be discovered, appropriate measures shall be implemented, in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

**Regulatory Measure H-4:** Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall undertake an appropriate investigation to ascertain whether any hazardous conditions would occur as a function of implementing the streetscape improvements along Grand Avenue and/or the Civic Park. Should elevated concentrations of contaminants be identified, appropriate measures shall be implemented in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure H-5**: Prior to demolition or renovation in the Civic Center Mall, the responsible parties for implementation of the Civic Park

under the applicable agreements shall perform an asbestos-sampling survey to determine the presence of asbestos containing materials. If such materials should be found, the responsible parties for implementation of the Civic Park shall prepare and implement an Operations and Maintenance Plan that meets all applicable federal, state and local requirements. This plan shall safely maintain asbestos containing materials that remain on the site. The County's CAO or its designee shall determine compliance with this measure.

**Regulatory Measure H-6**: Prior to the start of any demolition activities or renovation on any painted surfaces at the Project site, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall conduct a survey of lead based paint (LBP) to determine the level of risk posed to maintenance personnel, construction workers, facility staff, and patrons from exposure to the paints present at the site. Any recommendations made in that survey related to the paints present at the Project site shall be implemented prior to the demolition or renovation of said painted surfaces. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

c. Supportive Evidence and Rationale – The Project's potential impacts attributable to hazards and hazardous materials were analyzed in detail in Section IV-H of the DEIR. According to the Phase I environmental assessments completed for the Project site, there are no potential recognized environmental conditions (RECs) within any of the five development parcels. In addition, there is no evidence at the Project site of asbestos, hazardous materials use, storage or waste, or hazardous air emissions. It is anticipated that hazardous materials, including fertilizers, herbicides and pesticides, would be used to maintain the landscaping within the Civic Park, the Grand Avenue streetscape program and the five development parcels. In addition, hazardous materials associated with maintenance activity within the five development parcels would be present at the Project site. However, since the transport, use and storage of these materials would be managed in accordance with applicable federal, state, and local regulations, these materials would not be expected to pose significant risks to the public or the environment. Consequently, construction and operation under both Project Options would not expose people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard in excess of

regulatory standards. Accordingly, construction and operation under both Project Options would not result in a significant hazard to the public or the environment through the transport, use or disposal of hazardous materials, and impacts would be less than significant. Further, impacts associated with the potential discovery of hazardous and non-hazardous materials on the Project site would be reduced to a less than significant level with compliance with the above regulatory measures.

d. Cumulative Impact – In light of existing federal and state regulations, it is assumed that any potential hazardous materials located on any of the 93 related project sites would be identified and remediated prior to construction and operation of any habitable facility. As such, any groundwater or soil contamination occurring on the related project sites would be addressed in accordance with applicable regulations and mitigation measures during the permitting process by the applicable responsible agencies. Such remediation activities in accordance with federal, state, and local regulations would reduce any significant impacts associated with hazardous materials to less than significant levels. Therefore, with monitoring and compliance with federal, state and local regulations and procedures, the potential for cumulative impacts attributable to the Project's and related projects' transport, use or disposal of hazardous materials would be less than significant.

## I. Fire Protection and Related Services

a. Potential Impacts – The Project would cause a significant impact to Los Angeles Fire Department fire prevention and suppression services and/or emergency medical services if:

   i. The Project would cause a substantial increase in emergency response times as a result of increased traffic congestion; or

   ii. The Project would exceed the capability of existing fire stations and emergency personnel to serve the Project site.

b. Findings – The Project will not cause a significant impact with regard to fire prevention or emergency medical services. Notwithstanding, the following regulatory measures and project design features have been identified to ensure the Project's less than significant impact concerning this issue:

**Regulatory Measure I.1-1**: During demolition activities occurring during each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure sure that emergency access shall remain clear and unobstructed. The LAFD

shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County Fire Department (LACoFD) shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-2**: Prior to each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall prepare, and thereafter implement, plans and specifications to ensure that the construction contractor is apprised of the requirement to maintain access to sub-surface parking structures associated with the Civic Center Mall, the Music Center, and the Colburn School for Performing Arts. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-3**: During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall maintain access for emergency response personnel to the Kenneth Hahn Hall of Administration, the Paseo de los Pobladores de Los Angeles, the County Courthouse, the Colburn School for Performing Arts, and the Walt Disney Concert Hall. The LAFD shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-4:** Prior to each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, a plan to ensure that emergency evacuation from the northwest side of the County Mall and Colburn School for Performing Arts, the southeast side of the Music Center and the Walt Disney Concert Hall would not be impeded by construction of the individual Project elements. With respect to the plan for the Mall, it must be prepared to coordinate with emergency evacuation plans for the Courthouse and the Hall of Administration. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-5**: During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that sufficient fire hydrants shall remain accessible at all times during Project construction. The LAFD shall determine compliance with this measure with regard to the five

development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-6**: Prior to the start of each construction phase and during Project operations, the developer, with regard to the five development parcels shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, and the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708). The City of Los Angeles Fire Department (LAFD) shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-7**: During Project operations, the developer, with regard to the five development parcels shall maintain all access roads, including fire lanes, in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-8**: Prior to the start of each construction phase, Related, with regard to the five development parcels and the responsible parties for implementation of the Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications in accordance with LAFD requirements, and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the five development parcels or the Streetscape Program. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

**Regulatory Measure I.1-9**: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall prepare, and thereafter implement, plans in accordance with LACoFD requirements, and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the Civic Park. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-10**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, a plan that will assure that any required fire hydrants that are installed shall be fully operational and accepted by the Fire Department prior to any building construction. The LAFD shall determine compliance with this measure with regard to the five development parcels and the

Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-11**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall submit plot plans indicating access roads and turning areas to the LAFD for review and approval. The developer, with regard to the five development parcels shall implement the approved plot plans. The LAFD shall determine compliance with this measure.

**Regulatory Measure I.1-12**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, engineering plans that show adequate fire flow and placement of adequate and required public and private fire hydrants. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-13**: During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall provide emergency access for Fire Department apparatus and personnel to and into all structures. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-14:** Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that will provide that any private roadways for general access use and fire lanes shall not be less than 20 feet wide and clear to the sky. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-15**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that will provide that any fire lanes and dead end streets shall terminate in a cul-de-sac or other approved turning area. No dead end street or fire lane shall be greater than 700 feet in length or secondary access shall be required. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-16**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that designs any proposed development utilizing cluster, group, or condominium design not more than 150 feet from the edge of the roadway of an improved street, access road, or

designated fire lane. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-17**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that designs fire lanes to be not less than 28 feet in width. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-18:** Prior to the start of each construction phase, the developer, with regard to the five development parcels, where above ground floors are used for residential purposes, shall prepare, and thereafter implement, a plan that interprets the access requirement as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of the residential units. The LAFD shall determine compliance with this measure.

**Regulatory Measure I.1-19**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall prepare, and thereafter implement, a plan that designs the entrance or exit of all ground level residential units to be no more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure.

**Regulatory Measure I.1-20:** Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides access that requires the accommodation of Fire Department apparatus, shall design the minimum outside radius of the paved surface to be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-21**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall not construct any building or portion of a building to be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-22**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall prepare, and thereafter implement, a plan that provides for access that requires accommodation of Fire Department apparatus, a design for overhead

clearances to be not less than 14 feet. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-23**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides for additional vehicular access required by the Fire Department, where buildings exceed 28 feet in height. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-24**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides, where fire apparatus shall be driven onto the road level surface of the subterranean parking structure, for the structure to be engineered to withstand a bearing pressure of 8,600 pounds per square foot. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-25**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall record any private streets as Private Streets and Fire Lanes. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-26**: During operation of the Project, the developer, with regard to the five development parcels, shall provide that all electric gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety, or other appropriate City agency or department, granting a Certificate of Occupancy. The LAFD shall determine compliance with this measure.

**Regulatory Measure I.1-27**. Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall prepare, and thereafter implement, a plan that would not construct any building or portion of a building more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel with the exception that dwelling unit travel distance shall be computed to the front door of the unit. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.1-28**. Prior to the start of each construction phase, the developer, with regard to the five development parcels shall submit plans to the Fire Department for review and approval. Where rescue window access is required, the developer, with regard to the five development parcels, shall incorporate conditions and improvements

necessary to meet accessibility standards as determined by the LAFD. The LAFD shall determine compliance with this measure.

**Regulatory Measure I.1-29.** During operations of the Project, the developer, with regard to the five development parcels shall have the curbs of all public street and fire lane cul-de-sacs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac. The LAFD shall determine compliance with this measure with regard to the five development parcels.

**Regulatory Measure I.1-30.** During operations of the Project, planning for large events at the Civic Park shall be implemented by the County or County Park Operator to reduce potential adverse affects on emergency access. As part of the planning process, representatives of the LACoFD, County Office of Public Safety, LAFD, LAPD and LADOT shall be advised of the activities and consulted to establish appropriate procedures for crowd and traffic control. Plans shall be submitted to the County Chief Administrative Officer for review and approval.

**Project Design Feature I.1-1**: Prior to the start of each construction phase, the developer, with regard to the five development parcels shall submit building plans to the LAFD for review and approval that demonstrate that automatic fire sprinklers shall be installed in all structures. The LAFD shall determine compliance with this measure.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impacts on fire protection and related services in Section IV-I(1) of the DEIR. Construction may result in temporary lane closures that would potentially affect emergency access. Temporary lane closures could increase the time for fire protection vehicles and emergency medical vehicles responding to elderly or disabled residents in the downtown areas. However, the average response times for Fire Stations 3, 4, 9, and 10, which would serve the Project and currently serve the surrounding area are 5.3 minutes, 4.6 minutes, 4.8 minutes, and 4.9 minutes, respectively. Those response times are below the Citywide average response times of 5.5 minutes for EMS and 5.4 minutes for fire incidents, which indicates these existing services will be adequate to handle incidents during Project construction. To ensure adequate response times for these services, the LAFD would be notified of the scheduling of all Project construction in order to plan appropriate alternative response routes, if necessary. Public detour routes would be established where required to divert traffic from the affected street segments. In addition, emergency vehicle access to adjoining and nearby properties would be required to be maintained at all times. Thus,

due to the better than City-wide response times, the large number of fire stations in the Project area, the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, construction of the Project will not significantly impact the ability of the LAFD to respond to emergency incidents, as confirmed by the FEIR. With respect to Project operations, automatic fire sprinkler systems in all structures, fire hydrants installed to LAFD specifications, and supplemental fire protection devices would be incorporated into new Project structures, as required by the Fire Code. As the Project site is within the service area of four Task Force truck and engine companies, Project operations are anticipated to result in less than significant impacts to LAFD staff and equipment capabilities. In addition, the Project will comply with all fire safety regulations and the incorporation of regulatory measures. No significant impacts will occur with respect to fire protection and related services.

d. Cumulative Impact – The LAFD has determined that development of the Project, in conjunction with other approved and planned projects, may result in the need for the following: (1) increased staffing at existing facilities; (2) additional fire protection facilities; and (3) relocation of existing fire protection facilities. However, as related project applicants would be required to coordinate with the LAFD to ensure that related project construction and operations would not significantly impact LAFD services and facilities, no significant cumulative impacts are anticipated.

## J. Police Protection Services

a. Potential Impacts – The Project may cause a significant impact on police protection services provided by the LAPD if:

   i. The Project will generate demand for additional police protection services that substantially exceeds the capability of the LAPD to serve the Project site.

   ii. The Project would cause a substantial increase in emergency response times as a result of increased traffic congestion and/or limited emergency access, during either construction or operation of the Project.

b. Findings - The Project will not cause a significant impact with regard to police services. Notwithstanding, the following regulatory measures have been identified to ensure a less than significant impact concerning this issue.

**Regulatory Measure I.2-1**: During each construction phase, the developer, with regard to the five development parcels, and the responsible

parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall provide clear and unobstructed LAPD access to the construction site. The LAPD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.2-2**: During ongoing construction, the developer, with regard to the five development parcels shall provide security features on the construction site(s), such as guards, fencing, and locked entrances. The LAPD shall determine compliance with this measure.

**Regulatory Measure I.2-3:** Prior to the start of each construction phase, the developer, with regard to the five development parcels, shall submit plot plans for all proposed development to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented by the developer to the extent feasible.

**Regulatory Measure I.2-4**: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plot plans for all proposed development to the County Office of Public Safety for review and comment. Security features subsequently recommended by the Office of Public Safety shall be implemented by the County or County Park Operator to the extent feasible.

**Regulatory Measure I.2-5**: At the completion of each construction phase, the developer, with regard to the five development parcels shall file as-built building plans with the LAPD Central Area Commanding Officer. Plans shall include access routes, floor plans, and any additional information that might facilitate prompt and efficient police response. The LAPD shall determine compliance with this measure.

**Regulatory Measure I.2-6**: During Project operations, the developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park shall install alarms and/or locked gates on doorways providing public access to commercial facilities. The LAPD shall determine compliance with this measure with regard to the five development parcels. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.2-7**: During Project operations, the developer, with regard to the five development parcels shall not plant landscaping in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users. The LAPD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

**Regulatory Measure I.2-8**: Additional lighting shall be installed where appropriate, including on the Project site and in parking garages, as

determined in consultation with the LAPD with regard to the five development parcels and the County Office of Public Safety with regard to the Civic Park. The developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement these measures prior to the completion of construction for each of those Project components.

**Regulatory Measure I.2-9**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, a plan that incorporates safety features into the Project's design to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include the provision of security personnel; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the parking garages, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets. The LAPD shall determine compliance with this measure with regard to the five development parcels. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure I.2-10**: Prior to the issuance of a certificate of occupancy for each construction phase and during Project operations, the developer, with regard to the five development parcels, shall develop, and thereafter implement, a new or modified Security Plan to minimize the potential for on-site crime and the need for LAPD services. The plan would outline the security services and features to be implemented, as determined in consultation with the LAPD. The LAPD shall determine compliance with this measure with regard to the five development parcels. The following shall be included in the plan:

1. Provision of an on-site security force that would monitor and patrol the Project site. During operational hours, security officers shall perform pedestrian, vehicular, and/or bicycle patrols.
2. Implementation of a video camera surveillance system and/or a closed-circuit television system;
3. Additional security features shall be incorporated into the design of proposed parking facilities, including "spotters" for parking areas, and ensuring the availability of sufficient parking either on- or off-site for all building employees and anticipated patrons and visitors;
4. Security lighting incorporating good illumination and minimum dead space in the design of entryways, seating areas, lobbies, elevators,

service areas, and parking areas to eliminate areas of concealment. Security lighting shall incorporate full cutoff fixtures which minimize glare from the light source and provide light downward and inward to structures to maximize visibility;

5. Provision of lockable doors at appropriate Project entryways, offices, retail stores, and restaurants;
6. Installation of alarms at appropriate Project entryways and ancillary commercial structures;
7. All businesses desiring to sell or allow consumption of alcoholic beverages are subject to the issuance of a Conditional Use Permit by the City;
8. Accessibility for emergency service personnel and vehicles into each structure, and detailed diagram(s) of the Project site, including access routes, unit numbers, and any information that would facilitate police response shall be provided to the Central Area Commanding Officer.
9. In addition, security procedures regarding initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance shall be outlined in the Security Plan. The plan would be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the LADOT.

**Regulatory Measure I.2-11**: Prior to the issuance of a certificate of occupancy for each construction phase and on-going during operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall develop, and thereafter implement, a Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by the LAPD with regard to the five development parcels and the County Office of Public Safety with regard to the Civic Park, and any provisions pertaining to access would be subject to approval by LADOT.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impacts on police protection and related services in Section IV-I(2) of the DEIR The Project's impacts on police protection services or response times would continue to be less than significant. Project construction may result in temporary lane closures that would potentially affect emergency access. Given notification to the LAPD of all construction scheduling, the temporary nature of any closures, and the availability of alternative routes, the Project would not significantly affect emergency access or response times. Furthermore, during construction, traffic

management personnel (flag persons) would be trained to assist in emergency response, and on-site security measures would reduce theft and other demands on police services. Therefore, construction activities are not expected to significantly affect the capacity of the LAPD to adequately serve the Project site. With regard to Project operation, it is anticipated that activity in the Civic Park would increase on both a daily basis and during special events. As the current Civic Center Mall is currently used extensively on a daily basis, the additional increase in activity on a daily basis is not anticipated to increase to such an extent so as to exceed the capabilities of the County Office of Public Safety. During special events, when the numbers of people using the park would increase substantially, the park operator would employ private security personnel to supplement police services during these events and, therefore, reduce the demand on police services created by these large events. The use of additional security staff would be commensurate with the size of the event. Access to the park would be governed by a set of rules that are consistent with those used throughout public parks in the area. Those who comply with the posted rules will not be denied access to the park, whereas on the other hand, those individuals who chose not to comply with the rules would, out of courtesy to others, be required to leave the park. The Project's combined residential and employment population would reduce the officer per resident ratio and, assuming the same number of officers in the LAPD Central Area station as under existing conditions, the ratio of crimes that are handled by each officer would increase from approximately 20 to 23.4. This level of increased demand in the context of occurring over an entire year would not substantially exceed LAPD's capacity. Accordingly, the Project's impact to police services would be less than significant.

d. Cumulative Impact – Although the operation of Project would have a less-than-significant impact on police services, because the list of related projects is extensive and, if all related projects were built, the combined Project and related projects would have a significant cumulative impact with regard to police protection services. This level of increased demand would substantially exceed the LAPD's capacity to provide services from the Central Area station. For example, under the County Office Building Option, if the current 337 officers in the area were to remain constant at 337 officers, the ratio of population to officers would increase from 130 persons for each officer to 382 persons for each officer. If the per capita crime rate were to remain constant at 154 crimes per 1,000 population, there would be 19,849 additional crimes, and the crimes that would

need to be handled by each officer would increase from 20 to 59. However, if the City added police resources in response to such growth, then the cumulative impact to police services would be less than significant. Yet, it is conservatively assumed that the City may not be able to add such resources commensurate with such population growth, and, therefore, the cumulative impact to police services is determined to be significant.

## K. School Services

a. Potential Impacts – The Project may cause a significant impact on Los Angeles Unified School District ("LAUSD") schools if:
   i. The demand for school services anticipated at the time of Project build out exceeds the expected level of service available; or
   ii. The increased demand would require the construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (i.e., multi-track calendar), or other actions that would create a temporary or permanent impact on the school(s) serving the Project site.

b. Findings – Through compliance with Mitigation Measure I.3.1 and Government Code Section 65995, the Project will not cause a significant impact on schools, and no other mitigation measures are required

**Mitigation Measure I.3-1**: Prior to the issuance of each building permit, the developer, with regard to the five development parcels, shall pay school mitigation fees pursuant to the provisions of California Government Code Section 65995. Compliance with this measure shall be determined by the City's Department of Building and Safety, or other appropriate City agency or department.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impacts on schools in Section IV-I(3) of the DEIR Pursuant to the provisions of Government Code Section 65995, a project's impact on school facilities is fully mitigated through the payment of the requisite school facility development fees current at the time building permits are issued. As the developer is required to pay school facility development fees, impacts under the Project are concluded to be less than significant.

d. Cumulative Impact – The middle and high school students that would be generated by the 93 related projects would when combined with the Project's students, be dispersed throughout the attendance boundaries of both the existing and the newly constructed schools.

As a result, sufficient capacity would be available at the middle and high school level to accommodate the students generated by the Project in conjunction with all of the related projects and a less than significant cumulative impact would occur. In contrast, the students generated by the related projects combined with the Project's students could not be accommodated within the existing or future elementary school capacities. However, the Project and each related project would pay new school facility development fees and, under the provisions of Government Code Section 65995, the payment of these fees would constitute full mitigation. Thus, cumulative impacts on schools would be less than significant.

## L. Parks and Recreation

a. Project Construction

i. Potential Impacts – The construction of the Project may cause a significant impact on parks and recreational facilities if:

1. The Project generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services.

ii. Findings – The Project will not cause a significant impact to park and recreational facilities, except for a short-term significant and unavoidable impact during construction of the new Civic Park at the Civic Mall, which impact is a project-specific and cumulative impact. With respect to that latter impact, the Authority makes the following findings:

1. All feasible measures, changes and alterations have been required in, or incorporated into, the Project, which will lessen such significant environmental effects.

2. For the reasons set forth in the Statement of Overriding Considerations adopted concurrently by the Authority, the Authority finds that the significant impact identified in this Section XI-L(a) is acceptable in light of the Project's overall benefits.

iii. Supportive Evidence and Rationale – The FEIR discusses the Project's potentially significant impact to park and recreational facilities in Section IV.I.4 of the DEIR. Construction of the proposed improvements in Civic Park would require closure of the existing Civic Mall to implement those improvements. This would limit park availability and usage. Impacts on park usage would likely occur within the

immediate area of construction activity and adjacent park areas that might be sensitive to construction activities. It is not known if the entire Park area would be affected at a single time, or if Park improvements would be implemented on a smaller basis (e.g., block by block). As the construction activities could adversely affect park usage, the Project is considered to have a significant, short-term impact on parks during construction of the Civic Park. Upon completion of the Project, the affected park areas would return to operations with an enhanced level of operation due to improvements that were implemented during the construction phase. Construction of the remainder of the Project, namely, the five development parcels and the Grand Avenue street improvements would not cause any significant impacts to parks and recreational facilities since those sites currently include no parks or recreational facilities.

iv. Cumulative Impact – No related projects are known to affect the use or availability of those existing recreational resources that would be affected by the Project, either during their construction or operations phases. However, s the Project would prohibit the recreational use of the existing Civic Center Mall during the construction of the Project's Civic Park, it is conservatively concluded that cumulative impacts on recreational resources are considered significant.

b. Project Operation

i. Potential Impacts – The operation of the Project may cause a potentially significant impact to parks and recreational facilities if:

1. The Project generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services.

ii. Findings – The Project will not cause a significant impact to park and recreational services due to the implementation of Mitigation Measure I.4-1.

**Mitigation Measure I.4-1**: Prior to the issuance of a certificate of occupancy, the developer, with regard to the five development parcels, shall: (1) dedicate additional parkland such that the Project would provide a total of 3 acres per 1,000 Project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) a combination of the above. Compliance with this measure shall be

determined by the City's Department of Building and Safety or other appropriate City agency or department.

iii. Supportive Evidence and Rationale – The EIR discusses the potential impact to park and recreation services caused by Project operations in Section IV.I.4 of the DEIR. Compliance with the mitigation measure for meeting park demand would reduce any impacts due to park dedication shortfalls to less than significant levels. The required dedication of parkland from a project is determined by the number of residents within the project. Under the Quimby Act, which is implemented through the City's Municipal Code, three acres per 1,000 residents are required. The Project with County Office Building Option is anticipated to generate approximately 2,925 residents and would be required to provide approximately 8.8 acres of park/recreation space. The Additional Residential Development Option is anticipated to generate approximately 3,777 residents and would be required to provide approximately 11.33 acres of park/recreation space. Since these requirements would not be fully achievable on-site, the developer would be required to either dedicate additional parkland or pay in-lieu fees per the Quimby Act. If in lieu fees are paid, such fees would be used by the City to enhance park and recreational facilities in the appropriate geographic areas. Compliance with the Quimby Act would offset the Project's park and recreational facility shortfall and would avoid a significant impact.

iv. Cumulative Impact -- As with the Project, compliance by related projects with the Quimby Act to either dedicate additional parkland or pay in-lieu fees would offset the park/recreation demands of such related projects and, therefore, avoid a significant cumulative impact.

## M. Library Services

a. Potential Impacts – The Project may cause a significant impact on library services caused by the Project. A Project could have a significant impact on library services if:

i. The Project would generate a demand for library facilities or services that would cause an increase in the community population that would exceed Los Angeles Public Library ("LAPL") defined target service population.

b. Findings – The Project will not cause significant impacts on library services, and no mitigation measures are required.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impacts on libraries in Section IV-I(5) of the DEIR The increase in residential population, employees and patrons associated under the Project would increase demand on LAPL facilities in this area, including the Central Library, the Little Tokyo and Chinatown Branch Libraries. However, the Project is not expected to cause an increase in the community population that would exceed the LAPL-defined service target population. The LAPL has indicated in comments to the NOP for the EIR that the Project should pay a fee of $200 per capita to offset the increase in library service demand. However, the detailed analysis provided in the EIR demonstrates that the Project would not cause a significant impact on library services, and the LAPL did not provide any data in its NOP response letter to the contrary. In addition, the LAPL did not provide any comments on the DEIR. Further, it should be noted that the LAPL has not taken the necessary legal steps to impose a mitigation fee on all new development projects in its jurisdiction.

d. Cumulative Impacts – Population increases created by the 93 related projects in combination with the Project would increase the demand for LAPL services within the Project area. If a large number of these related projects are eventually developed and such future development causes a demand on library services beyond the capacity of the then existing libraries, then the LAPL may take the necessary steps to adopt an impact fee program that would adequately mitigate that cumulative impact on library services. However, since the LAPL has not adopted such a fee program, the Authority conservatively determines that the cumulative impact on library services will be significant.

## N. Water Supply

a. Potential Impacts – The Project may cause a significant impact on the water supply if:

i. The public water system's total projected water supplies available during normal, single dry and multiple dry water years during the current 20-year projection would not meet the projected water demand associated with the proposed Project, as well as all other future uses, including agricultural and manufacturing uses.

ii. The estimated water demand for the Project would exceed the available capacity within the distribution infrastructure that would serve the Project site.

iii. The construction of a new or upgraded water distribution infrastructure would result in substantial obstruction of vehicle and/or pedestrian access.

b. Findings – With the implementation of Mitigation Measure J.1-1, the Project's potentially significant impact on water supply will be reduced to a less than significant level. In addition, a series of regulatory measures are identified that would result in reducing the water demand attributable to the Project.

**Mitigation Measure J.1-1**: Prior to initial occupancy of the buildings within Parcels L and W-1/W-2, the developer shall install new water lines along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L. The City's Department of Public Works shall review and approve all plans related to these new water lines. The developer shall be responsible for the implementation of these improvements.

**Regulatory Measure J.1-1**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall call DIG-ALERT to identify and mark on the ground surface the locations of existing underground utilities. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.1-2**: Prior to the start off each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall perform potholing of existing water and gas mains to verify the depth of cover. If the depth of cover over the lines is shallow and the total street pavement section is thick (around 24 inches), then the temporary cover over the lines during construction may be reduced to 12 inches or less. Under these circumstances, protective measures shall be implemented to prevent damage or breakage of the lines during the pavement sub-grade preparation process. Notices of service interruption, if necessary, shall be provided to customers in accordance with DWP-Water and ACG requirements. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's

CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.1-3**: Prior to issuance of building permits for each construction phase, the developer, with regard to the five development parcels, shall pay the appropriate fees as may be imposed by the City's Department of Building and Safety, or other appropriate City agency or department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements. Compliance with this measure shall be determined by the City's Department of Building and Safety, or other appropriate City agency or department,

**Regulatory Measure J.1-4**: Prior the issuance of building permits for each construction phase, the developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park Plan under the applicable agreements, shall coordinate with the Los Angeles Department of Water and Power to conduct a flow test to confirm that the existing water system meets fire flow requirements imposed by the LAFD for the Project. The developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park Plan under the applicable agreements, shall undertake and complete required improvements as identified by the LADWP, based on the findings of the flow test. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO Department of shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.1-5**: During Project operations, the developer, with regard to the five development parcels, shall incorporate Phase I of the City of Los Angeles' Emergency Water Conservation Plan into all privately operated parcels. The Plan prohibits hose watering of driveways and associated walkways, mandates decorative fountains to use recycled water, mandates drinking water in restaurants to be served upon request only, and provides that water leaks are repaired in a timely manner. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure.

**Regulatory Measure J.1-6:** During Project operations, incorporate Los Angeles County water conservation policies into the operation of the Civic Park, and the County Office Building, if the Project proceeds with the County office building option. The responsible parties for the implementation of the Civic Park under the applicable agreements, and the County with regard to the County Office Building, if the Project proceeds with the County office building option, shall be responsible for

implementing this measure. The implementation of this measure shall be subject to the review and approval of the County's CAO or its designee.

**Regulatory Measure J.1-7**: During Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements and the County Office Building operator shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.1-8**: During Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall install automatic sprinkler systems to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation, and sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

c. Supportive Evidence and Rationale – The Project's potentially significant impact on the water supply is analyzed in Section IV.J.1 of the DEIR. Based on a Water Supply Assessment certified by the Los Angeles Department of Water and Power ("LADWP"), the total estimated water demand for the Project at build-out is not expected to exceed available supplies during normal, single dry and multiple dry water years during the 20-year planning period projection. Further, the Project is not anticipated to exceed the available capacity within the distribution infrastructure that would serve the Project site. Other than connections from the Project site to the water mains and the installation of new water lines along Second Street, the construction of a new or upgraded distribution and conveyance infrastructure would not be required. With regulatory compliance and incorporation of the mitigation measures discussed above, impacts to water supply associated with the Project would be less than significant.

d. Cumulative Impact – Development of the 93 related projects would cumulatively contribute, in conjunction with the Project to the water

demand in the Project area. Related projects are anticipated to be developed in compliance with all applicable water conservation regulations and within the build-out scenario of the Community Plans and the City of Los Angeles General Plan elements. Further, the LADWP Water Supply Assessment concluded that there are adequate water supplies to meet all existing and future water demands for the next 20 years. As such, impacts associated with cumulative water demand would be less than significant.

## O. Wastewater

a. Potential Impacts – The Project may cause a significant impact on wastewater conveyance and treatment facilities if:

i. The Project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of the Hyperion Treatment Plant ("HTP").

ii. The Project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

iii. The construction of new or upgraded wastewater distribution infrastructure would result in a substantial obstruction of vehicle and/or pedestrian access.

b. Findings – The Project will not cause a significant impact with regard to wastewater service. Notwithstanding, the following regulatory measures have been identified to ensure the Project's less than significant impact concerning this issue.

**Regulatory Measure J.2-1**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park shall comply with City ordinances limiting connections to the City sewer system, in accordance with City Bureau of Sanitation procedures. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall ensure compliance with this measure.

**Regulatory Measure J.2-2**: Prior to the start of each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park Plan, shall prepare, and thereafter implement, building plan specifications for the installation of low-flow water fixtures and further encourage reduction of water consumption to minimize wastewater flow to the sewer system, in accordance with applicable water conservation requirements. The City's

Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall ensure compliance with this measure.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impact on wastewater facilities in Section IV-J(2) of the DEIR. The operation of the Project under the County Office Building Option would generate 631,650 gallons per day (gpd) of wastewater and a peak flow of 1,073,805 gpd. The Project under the Additional Residential Development Option would generate 592,070 gpd on average and a peak flow of 1,006,519 gpd. By complying with the provisions of the City's Sewer Allocation Ordinance, wastewater generation resulting from operation of the Project would not substantially exceed the future scheduled capacity of the HTP. Nor, would the Project cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or would cause a sewer's capacity to become constrained. Therefore, implementation of the Project would result in a less than significant impact to wastewater facilities.

d. Cumulative Impact – Development of the 93 related projects, in conjunction with the Project would cumulatively contribute to wastewater generation in the Project area. The Project with Additional Residential Option would generate nearly seven percent less wastewater than that of the proposed Project with County Office Building Option. The wastewater anticipated to be discharged by the related projects along with the Project with County Office Building Option is 7.3 million gpd, which represents approximately 1.6 percent of the HTP's full capacity of 450 million gpd. Each of the individual related projects would be subject to the LADWP's determination of whether there is allotted sewer capacity available prior to the formal acceptance of plans and specifications by the Department of Building and Safety. Therefore, cumulative impacts to the local and regional sewer system for the Project, in conjunction with the related projects, would be less than significant.

## P. Solid Waste

a. Potential Impacts – The Project may cause a significant impact concerning solid waste if:

i. The Project generates solid waste at a level that exceeds the available capacity of the existing and/or planned landfills.

ii. The Project conflicts with diversion and recycling goals set forth in the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) and Source Reduction and Recycling Element (SRRE).

b. Findings - The Project will not cause a less than significant impact with regard to solid waste services. Notwithstanding, the following regulatory measures have been identified to ensure the Project's less than significant impact concerning this matter.

**Regulatory Measure J.3-1**: Prior to the issuance of a certificate of occupancy for each construction phase, and thereafter during Project operations, the developer, with regard to the five development parcels, shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the five development parcels. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

**Regulatory Measure J.3-2**: Prior to the issuance of each certificate of occupancy, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, a plan that designs all structures constructed or uses established within any part of the proposed Project site to be permanently equipped with clearly marked, durable, source sorted recyclable bins at all times to facilitate the separation and deposit of recyclable materials. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.3-3**: Prior to the issuance of each certificate of occupancy, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall prepare, and thereafter implement, a plan that designs primary collection bins to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.3-4**: During Project operations, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall continuously maintain in good order for the

convenience of businesses, patrons, employees and park visitors clearly marked, durable and separate bins on the same lot, or parcel to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Regulatory Measure J.3-5**: During each construction phase, the developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction. The City's Department of Building and Safety, or other appropriate City agency or department, shall review and approve the plan with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall review and approve the plan with regard to the Civic Park.

c. Supportive Evidence and Rationale – The FEIR analyzed in detail the Project's potential impact on solid waste facilities in Section IV-J(3) of the DEIR. The Project would not cause the available capacity of the existing and/or planned landfills to be exceeded, and impacts due to construction and operations would be less than significant. Nonetheless, regulatory mitigation measures have been identified concerning compliance with existing plans, programs and policies promoting recycling, waste reduction and waste diversion.

d. Cumulative Impact – Development of the 93 related projects would generate solid waste during their respective construction periods and on an on-going basis following the completion of construction. The total cumulative construction debris from the related projects and proposed Project would total 63,000 tons. This would comprise approximately 0.1 percent of the remaining inert landfill disposal capacity of 69.94 million tons and, as such, cumulative impacts on inert landfill capacity would be less than significant. During operation, the total cumulative solid waste generation is estimated to be 112,015 tons per year under the Project with County Office Building Option and 107,660 tons per year under the Project with

Additional Residential Development Option. These levels of cumulative annual solid waste generation represent approximately 1.2 percent of the total solid waste generated in Los Angeles County in 2003. Based on these small percentages, and the County's forecast of 15 years of landfill availability, cumulative impacts on municipal landfill capacity are concluded to be less than significant.

## XII. Alternatives

CEQA Guideline 15126.6 requires an EIR to (1) describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project; and (2) evaluate the comparative merits of the alternatives. In analyzing the feasibility of an alternative, the CEQA Guidelines list the following factors: site suitability; economic viability; infrastructure viability; social, legal and technological issues; and jurisdictional boundaries. The purpose of the consideration and discussion of alternatives to the proposed project is to identify ways to mitigate or avoid the significant effects that a project may have on the environment. In doing so, CEQA Guideline 15126.6 directs that the analysis of alternatives be limited to alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

The selection and discussion of alternatives to the project is intended to foster meaningful public participation and informed decision-making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote or speculative. CEQA Guideline 15126.6 also requires the analysis of a "No Project" alternative and the identification of an "Environmentally Superior Alternative." If the environmentally superior alternative is the No Project Alternative, then the EIR is required to identify an environmentally superior alternative among the remaining alternatives.

Finally, CEQA Guideline 15126.6 requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination of such infeasibility.

### A. Alternatives Considered But Rejected

Two alternatives were identified but subsequently rejected from further analysis in the FEIR. The first such rejected alternative was the Alternative Location Alternative. With respect to alternative sites for any proposed project, CEQA Guideline

15126.6(f)(2)(A) provides that: "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR."

Based on substantial evidence, the Authority determined that the relocation of the Project to another location would not substantially reduce the Project's primary significant impacts relative to traffic, air quality, and noise, and would likely have a greater impact regarding land use compatibility, visual context and scale since it is specific to a highly urbanized environment. Although an alternative location may eliminate potentially significant historical and specific view impacts, it would likely cause view impacts in an alternative location due to the size of the proposed buildings. Further, since the Project location is specific to the Civic Center Mall, Grand Avenue, and the Bunker Hill Redevelopment Project parcels, it would not be feasible to expand and renovate of the Civic Center Mall or develop the Grand Avenue streetscape improvements between Fifth Street and Cesar E. Chavez Avenue in another location. For all these reasons, the Alternative Location Analysis was properly rejected.

The second rejected alternative was the development of institutional uses, such schools and hospitals, in the remaining Bunker Hill Redevelopment Project parcels, Parcels Q, W-1/W-2, L and M-2. This alternative was rejected since it would have a significant land use impact in relation to the implementation of the policies of adopted plans and policies, including housing policies of the General Plan Framework; policies of the Central City Community Plan to encourage a mix of uses which create a 24-hour downtown environment; policies of the Bunker Hill Redevelopment Plan to provide convenient and efficient living accommodations for downtown employees and a range of housing types, including affordable housing; the policies of the existing Bunker Hill Design for Development which call for a mix of commercial and residential uses in theses parcels; and policies of the Downtown Strategic Plan, which recognize the need to substantially increase the residential presence in the downtown community. Such an alternative would also not implement the jobs/housing balance goals of SCAG's Regional Comprehensive Plan and Guide or the goals of that plan to place high-density multi-family uses within urban centers in close proximity to transit and other multi-modal transportation opportunities. This alternative would also not meet the basic objectives of the Project to provide a mixed-use development with a mix of uses that are economically viable. For all these reasons, this alternative was properly rejected.

Finally, a commentator during the public review process suggested that the Project should be modified to include a higher percentage of affordable housing units. However, the developer has committed to 20 percent of the overall housing units in the Project being affordable units, and substantial evidence supports the conclusion that additional subsidies from the LA/CRA or others for an even greater number of affordable housing

units in the Project are not available or feasible, and that key Project objectives would not be achieved if more financial resources of the Project are devoted to additional affordable housing units, including the use of funds to improve and extend the existing County Mall into a Civic Park that can serve as a public gathering place for the entire region. Accordingly, the Authority finds that such an alternative to the Project is not feasible within the meaning of CEQA.

**B. The Five Alternatives Evaluated in the FEIR**

The following alternatives were analyzed in detail in the FEIR since they could (i) meet some of the Project Objectives and avoid or lessen some impacts or (ii) were required to be analyzed by the applicable provisions of CEQA (namely, the No Project Alternative):

- Alternative 1: No Project "A" – The Project site remains in its existing conditions.
- Alternative 2: No Project "B" – Development on Parcels Q and W-2 would occur per the provisions of the 1991 Owner Participation Agreement applicable to those parcels, while development on Parcels W-1, L, and M-2 would occur per current City zoning. Under the No Project "B" Alternative, the Grand Avenue streetscape program would be limited to only improvements along the frontage of Parcel Q, while no improvements to the existing Civic Center Mall would occur.
- Alternative 3: Reduced Density Alternative – Development on the five parcels would be reduced by 25 percent, as would proposed building heights. Improvements within the Civic Park as well as along the Grand Avenue streetscape program would be reduced commensurate with the reduced funding for Phase 1 that would be available from prepaid lease revenues.
- Alternative 4: Alternative Design Alternative – Two unrelated components of the Project would be changed under this Alternative – the Civic Park and the location of the towers on Parcels L and M-2. Under this Alternative, the existing Civic Center Mall's four character-defining features would remain as they exist today and in their current locations, or they would be retained and reused within the Civic Park in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings. Also under this Alternative, the towers proposed for development on Parcels L and M-2 would be reversed, such that the tower proposed for the southeast corner of Parcels L and M-2 would be moved to the southwest corner, and the tower proposed for the northwest corner would be moved to the northeast corner.

- Alternative 5: Alternative land Use Alternative – development on all five development parcels would be residential supported by a limited amount of retail development. The Civic Park and Grand Avenue streetscape program under this Alternative would be the same as the Project.

As described in this Section XII, the FEIR analyzed the issues of whether each of these alternatives (i) could achieve most of the Project Objectives and (ii) could reduce the Project's potentially significant impacts.

1. No Project "A" Alternative

a. Ability to Achieve Most of the Project Objectives

The No Project "A" Alternative would not meet the ultimate goal of the Project to provide an economically viable, architecturally distinguished community-oriented, mixed-use development with welcoming public open spaces or create, define, and celebrate the Civic and Cultural Center as a regional destination in downtown Los Angeles. In addition, the No Project "A" Alternative would also not meet any of the Project's priority objectives. This alternative would not meet the priority objective to create a vibrant 24-hour development that activates the Civic and Cultural Center through a mix of uses that complement each other, and that add to those that already exist on Bunker Hill; or meet the priority objective to implement the redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design. This alternative would also not meet the priority objective to generate at least $50 million in funds from the Project itself, and at least $45 million from Phase 1 by the lease of public land, and use these funds to improve and extend the existing Civic Center Mall into a Civic Park that can serve the entire region. This alternative would also not meet the priority objective of providing affordable units and it would not meet the priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County. The No Project "A" Alternative would also not meet the additional objectives of the Project in that it would not generate specific public benefits; activate downtown Los Angeles, create a civic gathering place, enhance pedestrian connections, create distinguished architectural design, or facilitate achievement of redevelopment goals for the Bunker Hill District and the Central Business District.

b. Ability to Reduce the Project's Residual Significant Impacts

The No Project "A" Alternative would avoid the Project's significant and unavoidable impacts associated with compliance with existing zoning designations, construction hauling, periodic closures of the Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Mall during their relocation, any temporary lane closures, intersection service thresholds, occasional traffic congestion during evening and large-scale events in the Civic Park, DAARP residential parking requirements, view obstruction, character-defining features in the Civic Center Mall, air quality

(constructions and operation), noise (construction), and parks and recreation (during construction of Civic Park), but would be less beneficial in relation to the implementation of existing land use plans and visual quality. The No Project "A" Alternative, however, would not eliminate significant, unavoidable traffic impacts that would occur under future baseline traffic conditions due to ambient growth and the development of other projects.

c. Determination of Infeasibility

Based on the findings set forth in this subsection 1, the analysis contained in the FEIR, and other substantial evidence in the record of the proceedings concerning the Project, the Authority finds that this alternative is not feasible within the meaning of CEQA.

2. No Project "B" Alternative

a. Ability to Achieve Most of the Project's Objectives

The No Project "B" Alternative would not meet the ultimate goal of the Project to provide an economically viable, community-oriented, mixed-use development. In addition, the No Project "B" Alternative would not meet any of the Project's priority objectives. The No Project "B" Alternative would not meet the Project's priority objective to establish Grand Avenue as a vibrant 24-hour urban place that activates the Civic and Cultural Center through a mix of uses and complement each other due to the substantial reduction of the Grand Avenue Streetscape Program, and no development of street front retail uses along Parcels L and M-2. This Alternative would not meet the Project's priority objective to generate at least $50 million in funds from the Project itself, and at least $45 million from Phase 1 by the lease of public land, and then using these funds to create the proposed Civic Park, nor implement the Grand Avenue Streetscape Program as envisioned. As such, it would not meet the Project objectives to create a civic gathering place and to enhance pedestrian connections. This Alternative would also not meet the priority objective of the Project to implement redevelopment plan objectives to permit a maximum density of development, since this Alternative would not maximize density on Parcels W-1/W-2, L and M.

Although the No Project "A" Alternative would meet the Project's priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County, the magnitude of revenue generation would be substantially reduced under this Alternative as compared to the Project, since Parcels W-2/W-2, L and M-2 would not be developed to their full potential. Furthermore, this Alternative would meet the priority objective to ensure that 20 percent of all residential units are affordable, since it would contain only a fraction of the number of affordable units that would be generated by the proposed Project's residential units.

b. Ability to Reduce the Project's Residual Significant Impact

The No Project "B" Alternative would reduce, but not completely avoid, the Project's significant and unavoidable impacts associated with construction hauling, lane closures, intersection service levels (although it would incrementally reduce peak hour traffic), DAARP residential parking requirements, view obstruction, air quality (construction and operation), and noise (construction). This alternative would be less beneficial than the Project in relation to the implementation of existing land use plans, which call for a greater mix of residential uses in the urban center and revitalization of the downtown. The No Project "B" Alternative would, however, avoid the Project's potential significant impacts associated with zoning compliance, periodic closures of the Grand Avenue and Hill Street ramps to the Civic Center mall during the reconstruction of the ramps, occasional traffic congestion during evening and large-scale events in the Civic Park, possible removal of historically significant character-defining features in the existing Civic Center Mall, and short-term recreational impacts associated with the closure of the existing Civic Center Mall during the construction of the Civic Park.

c. Determination of Infeasibility

Based on the findings set forth in this subsection 2, the analysis contained in the FEIR, and other substantial evidence in the record of the proceedings concerning the Project, the Authority finds that this alternative is not feasible within the meaning of CEQA.

3. Reduced Density Alternative

a. Ability to Achieve Most of Project's Objectives

The reduced Density Alternative may not meet the ultimate goal of the Project to provide an economically viable development since, with the reduction in scale, the Reduced Density Alternative would not be as economically viable as the Project. In addition, the Reduce Density Alternative would not meet the majority of the Project's priority objectives to create a vibrant, 24-hour development that activates the Civic and Cultural Center to the same extent as the Project. Furthermore, since the Alternative has less development than the Project, it would not meet the priority objective to implement redevelopment plan objectives to permit a maximum density of development. The Reduced density Alternative also would not implement the Project's priority objective to generate at least $50 million in funds from the Project itself, and at least $45 million from Phase 1 by the lease of public land, and then to use these funds to improve and extend the existing Civic Center Mall into the proposed Civic Park. In addition, this Alternative would not implement the Grand Avenue Streetscape Program (except adjacent to Parcel Q), further reducing the ability of this Alternative to meet the objectives of the Project to create a civic gathering place and to enhance pedestrian connections.

The Reduce Density Alternative would meet the priority objectives to ensure that 20 percent of all residential units in the Project are affordable units; however, due to the reduction in residential units, this would provide 25 percent fewer affordable units than the Project. This Alternative would also meet the priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County. However, since it would represent a reduction in scale, the stream of additional tax revenues would be incrementally less than under the Project.

The Reduced Density Alternative would meet the Project's objective to encourage public transit opportunities through the development of high-density residences in close proximity to existing transit systems. The Reduced Density Alternative would also meet the Project objective to provide residential densities in the Bunker Hill Redevelopment Project area as well as improve the jobs/housing balance downtown and establish a variety of housing types, although it would not maximize residential densities as well as the Project. The Reduced Density Alternative would also implement the redevelopment plan objectives to provide housing for workers who seek housing near their employment, but to a lesser degree than would occur under the Project.

b. Ability to Reduce the Project's Residual Significant Impacts

The Reduced Density Alternative would reduce, but not completely avoid, the Project's significant and unavoidable impacts associated with zoning compliance construction hauling, lane closures, periodic closures of the Grand Avenue and Hill Street ramps to the garage beneath the Civic Center Mall during their reconstruction, operation traffic, occasional traffic congestion during evening and large-scale evens in the Civic Park, DAARP residential parking requirements, view obstruction, air quality (construction and operation), and noise (construction). Additionally, this Alternative may possibly reduce impacts associated with the possible removal of the historically significant character-defining features in the Civic Center Mall, and short-term recreational impacts associated with the closure of Civic Center Mall during the Civic Park's construction phase, if the scope of the development in the Civic Park were reduced.

c. Determination of Infeasibility

Based on the findings set forth in this subsection 3, the analysis contained in the FEIR, and other substantial evidence in the record of the proceedings concerning the Project, the Authority finds that this alternative is not feasible within the meaning of CEQA.

4. Alternative Design Alternative

a. Ability to Achieve Most of Project Objectives

As with the Project, the Alternative Design Alternative would meet the ultimate goal of the Project to provide an economically viable, architecturally distinguished, community-oriented, mixed-use development with notable public open spaces that would create, define, and celebrate the Civic and Cultural Center as a regional destination. In addition, the Alternative Design Alternative would meet all the Project's priority objectives. This Alternative would meet all of the Project's specific objectives that are intended to ensure that the proposed development would generate specific public benefits, activate downtown Los Angeles, create a civic gathering place, enhance pedestrian connections, create distinguished architectural design, facilitate achievement of redevelopment goals for the Bunker Hill District and the amended Central Business District Redevelopment Plans.

b. Ability to Reduce the Project's Residual Significant Impacts

Through the retention of historically significant character-defining features, the Alternative Design Alternative would avoid the Project's potential significant impact on the historic resources present within the existing Civic Center Mall. However, the feasibility of retaining those elements of Civic Center Mall is not known at this time since the final design of Civic Park has not been completed. Due to, among other considerations, that final design may call for not retaining all of those features because of economic factors or planning objectives inherent in the Civic Park program.

This alternative would also reduce the Project's significant view impact for the residents of the Grand Promenade Tower building that have northerly views to a less than significant level. However, the Alternative Design Alternative would not avoid the Project's significant and unavoidable impacts associated with zoning compliance, construction hauling, lane closures, periodic closures of the Civic Mall Garage's Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Mall during their reconstruction, intersection service levels, DAARP residential parking requirements, views from locations other than the Grand Promenade Tower apartments, air quality (construction and operation), noise (construction). This Alternative would avoid the Project's potentially significant impacts on character-defining features in the existing Civic Center Mall.

c. Determination of Infeasibility

Based on the findings set forth in this subsection 4, the analysis contained in the FEIR, and other substantial evidence in the record of the proceedings concerning the Project, the Authority finds that (i) the component of this alternative concerning mandatory retention of the character-defining features of the Civic Center Mall is not feasible within the meaning of CEQA since the final design of the Civic Park is not known at this time, and (ii) the component of this alternative that concerns the reversal of the location of the two towers on Parcels L and M-2 is feasible.

5. Alternative Land Use Alternative

a. Ability to Achieve Most of Project Objectives

The Alternative Land Use Alternative, which would not provide a mixture of hotel and retail uses with the proposed residential uses, would not meet the ultimate goal of the Project to provide an economically viable, community-oriented, mixed-use development. Additionally, since this Alternative would not provide a hotel and would provide a limited amount of street-front retail uses and restaurants, this Alternative would not met the priority objective of the Project to the same extent as the Project to create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors through a mix of uses that complement each other. Although this Alternative anticipates implementation of the Grand Avenue Streetscape Program, with the absence of street-front retail uses and restaurants, this Alternative would not meet the priority objective to create a pleasant living and working environment to the same degree as the Project. This Alternative would meet the priority objective to generate at least $50 million in funds from the Project itself, and at least $45 million from Phase 1 by the lease of public land, and use these funds to improve and extend the existing Civic Center Mall into the proposed Civic Park. This Alternative would also meet the priority objective to ensure that 20 percent of all residential units in the Project are affordable units for low-income residents. This objective would also meet the priority objective to create a long-term stream of additional tax revenues for the City, the CRA/LA and the County. However, since taxes on residences are less than on commercial uses, this Alternative would not meet this objective to the same extent as the Project.

b. Ability to Reduce the Project's Residual Impacts

The Alternative Land Use Alternative would not avoid the Project's significant and unavoidable impacts associated with zoning compliance (due to residential uses in existing C2 zones), construction hauling, lane closures, periodic closures of the Grand Avenue and Hill Street ramps to the garage beneath the existing Civic Center Garage's during their reconstruction, intersection service levels, occasional traffic congestion during evening and large-scale events in the Civic Park, and DAARP residential parking requirements. However, the Alternative Land Use Alternative would incrementally reduce peak hour traffic. This Alternative would also not avoid the Project's potential significant impacts associated with air quality (construction and operation), noise

(construction), and short-term recreational impacts associated with the closure of the existing Civic Center Mall during the construction of the proposed Civic Park.

c. Determination of Infeasibility

Based on the findings set forth in this subsection 5, the analysis contained in the FEIR, and other substantial evidence in the record of the proceedings concerning the Project, the Authority finds that this alternative is not feasible within the meaning of CEQA.

## C. The Environmentally Superior Alternative

CEQA Guideline 15126.6 requires the identification of an environmentally superior alternative to the proposed Project and, if the environmentally superior alternative is the "No Project Alternative," the identification of an environmentally superior alternative from among the remaining alternatives. An environmentally superior alternative is an alternative that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with a project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the Project. Accordingly, selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative. The determination of the environmentally superior alternative is not based on any assessment of the Alternative's ability to meet the Project objectives.

In this matter, the No Project "A" Alternative (Alternative 1) would be the environmentally superior alternative as this alternative would have less impact relative to the Project than the other evaluated alternatives. CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative needs to be selected as environmentally superior. Based on the findings set forth in this section XII and the analysis contained in the FEIR, the Authority determines that the Reduced Density Alternative would be the environmentally superior alternative, since it may reduce the Project's impacts more broadly than the other Project alternatives.

# XIII. Statement Of Overriding Considerations

CEQA Guideline 15093(a) and (b) provides that:

> "(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic,

> legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'
>
> (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record."

The Authority adopts and makes this Statement of Overriding Considerations ("SOC") concerning the Project's unavoidable significant impacts to explain why the Project's benefits override and outweigh its unavoidable environmental impacts. Based on substantial evidence in the record, the Authority finds that each benefit of the Project set forth in this SOC constitutes an overriding consideration warranting approval of the Project, despite the unavoidable impacts.

1. The Project will create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, through a mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill.

2. The Project will provide substantial economic benefits for the entire region, generating an estimated $252 million annually in direct business revenues and over $362 million in indirect (off-site) business revenues throughout the County, for a total of $615 million in direct and indirect revenues generated by the Project each year.

3. The business activity generated by the Project is estimated to create up to 5,900 permanent jobs, both on-site and throughout the region. These workers will earn an estimated $165 million in pre-tax wages and salaries. All jobs generated on the Project site will comply with the CRA/LA's Living Wage Policy.

4. The Project will also create a significant number of construction jobs. Over the life of the construction of the Project, approximately 29,000 direct and indirect construction jobs will be created. These workers will earn over $1 billion in wages and salaries. All on-site construction jobs will comply with the Prevailing Wage law.

5. Significant tax revenues, an estimated $105 million, will be generated annually by the Project. These tax revenues will be shared by all levels of government. Approximately $74 million will go to the federal government, $21 million to the State

government, $5.7 million to the County government, and approximately $4.1 million to local governments, all on an on-going, annual basis.

6. The Project will generate at least $50 million in funds from the earlier phases of the Project itself, and at least $45 million from Phase 1 of the overall development, through the lease of public land. These funds will be used to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve as a public gathering place for the entire region. The ground lease of the development parcels was structured in a manner to ensure completion of the new Civic Park by the time Phase 1 of the development is completed.

7. The Project will revitalize, expand upon and activate the existing Los Angeles County Mall by developing it into a Civic Park stretching from the Music Center to City Hall. The new Civic Park will be operated to serve as an active, welcoming setting for daily activity as well as a gathering place for community celebrations, cultural and ethnic celebrations, festivals, holiday events, political gatherings and the like. The new Civic Park will be designed to accommodate a variety of sizes of community events and to encourage use of the Metro Red Line, which passes underground through the park at Hill Street.

8. The Project will provide a substantial amount of affordable housing units for low-income and very low income residents. The number of affordable units will equal 20 percent of the total number of housing units developed in the Project, which could yield up to 532 affordable units under the Additional Residential Development Option at full build-out. Long-term affordability covenants to guarantee the availability of such units to such qualified residents will be imposed.

9. The Project will develop a substantial number of housing units in the downtown, up to a total number of 2,660 units under the Additional Residential Development Option. This mix of additional housing units will greatly expand the diversity of downtown living options.

10. The Project will encourage and accommodate pedestrian activity by improving the streetscape along Grand Avenue between Fifth Street and Cesar Chavez Avenue. Streetscape improvements will include the strategic use of landscaping, benches and lighting, improved paving, and wider sidewalks where feasible. Such improvements will create an urban street that will foster pedestrian activity without comprising the functional requirements of vehicular circulation.

11. The Project will create new public spaces on the development parcels that are open and accessible to the public, including plaza areas, outdoor terraces and other gathering places, all with seating areas and landscaping.

12. The Project will increase the value of the four publicly owned, underutilized development parcels, while minimizing public investment in the Project. The value of these uniquely located public parcels will be further increased by the synergistic combination of the parcels into a unified development.

13. The Project will maintain the potential for a new County office building within the later phases of the Project.

14. The Project will create a northern anchor for the downtown area, complementing the southern anchor at "LA Live" to create a more diverse and vibrant downtown core.

15. The Project will enhance the use of public transit by creating easy access to the Metro Red Line at its Civic Center station, and easy access to the many local and commuter bus lines that surround the Project site.

16. The Project will improve pedestrian access from transit stops to the many regional attractions on Grand Avenue, including the Music Center, the Walt Disney Concert Hall, the Colburn School, and the Museum of Contemporary Art. Public access through the Project site will be facilitated by escalators, elevators, and a bridge over Olive Street, all assisting the pedestrian in transitioning the steep slope of Bunker Hill from Hill Street (where the Metro Red Line station exists) to Grand Avenue.

17. The Project will improve the jobs/housing balance in downtown, an area considered to be a "jobs rich" environment. By increasing the amount of housing available in a jobs rich area, there is a greater likelihood that people will work and live in areas in close proximity, thereby reducing traffic congestion and improving air quality when compared to traditional commuting patterns where the residence and job locations are separated by great distances.

18. The Project will comply with the CRA/LA's public art policy, which will facilitate the placement and maintenance of more public art in the downtown area.

19. The Project will create a job outreach and training program that will provide opportunities for local and low-income residents to secure jobs generated by the construction and operation of the Project through, among other ways, hiring and apprentice goals, coordination with the applicable unions, and on-the-job training requirements for such resident workers.

20. The Project will implement and satisfy numerous objectives of the Bunker Hill Redevelopment Plan (as listed in greater detail in Section V of the Findings and hereby incorporated into this SOC), including, but not limited to, the development of a project with a maximum density commensurate with the highest standards of architecture and landscape design aimed at creating a pleasant living and working environment.

## XIV. Mitigation Monitoring And Reporting Program

In accordance with CEQA Guideline 15091(d), the Authority adopts the Mitigation Monitoring Program that is included as part of the FEIR (the "MMP"). The MMP describes each of the Mitigation Measures identified in the FEIR, the entities responsible for implementing and monitoring each of those measures, and anticipated schedules for completion of those measures. Those measures and implementing program set forth in the MMP have been made enforceable through conditions in the DDA.

## XV. General Considerations

Each and all of the findings and determinations contained herein are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the FEIR. All of the language included in these Findings constitutes findings by the Authority, whether or not any particular sentence or clause includes a statement to that effect. All summaries of information in these Findings are based on the entire record of the proceedings, and the absence of any particular fact from any such summary herein is not an indication that a particular finding is not based, in part, on that fact.

The Authority's analysis and evaluation of the FEIR and the Project is based on the best information currently available. This practical limitation is acknowledged in CEQA Guideline 15151, which provides that "the sufficiency of an EIR is to be reviewed in light of what is feasible."

## XVI. Custodian Of Record Of Proceedings

In accordance with CEQA Guideline 15091(e), the documents and materials that constitute the record of the proceedings concerning the Authority's decision to certify the FEIR and approve the Project and all associated agreements shall be kept and maintained by the Managing Director of the Grand Avenue Committee, whose offices are located at 445 South Figueroa Street, Suite 3400, Los Angeles, CA 90071, telephone number (213) 413-4130. The Authority has the discretion to transfer or locate these records at the office of the County CAO Asset Management Division, located at 500 West Temple Street, 7th Floor, Los Angeles, CA 90012, and/or CRA/LA, located at 354 South Spring Street, Los Angeles, CA 90013.

# *FINAL ENVIRONMENTAL IMPACT REPORT*

# *The Grand Avenue Project*

## *Los Angeles, California*

*State Clearinghouse No. 2005091041*

***Prepared for:***

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Environmental Planning and Research

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# Preface

# PREFACE

This document, together with the Draft EIR and the technical Appendices to the Draft EIR as detailed below, constitutes the Final Environmental Impact Report (Final EIR) for the proposed Grand Avenue Project.

- The Draft EIR, which included the environmental analysis for the proposed Project; and
- Technical Appendices, which included:
  - Appendix A: Notice of Preparation (NOP), Initial Study, Scoping Meeting Transcript and Responses to the NOP
  - Appendix B: Traffic Analysis
  - Appendix C: Historic Resources Technical Report
  - Appendix D: Air Quality Calculation Worksheets
  - Appendix E: Noise Calculation Worksheets
  - Appendix F: Hazardous Materials Reports
  - Appendix G: Utilities Report
  - Appendix H: Environmental Equivalency Thresholds
  - Appendix I: Resumes of Draft EIR Authors

This Final EIR is organized in the following sections:

### I. Introduction

This section is intended to provide a brief overview of the California Environmental Quality Act (CEQA) requirements and EIR history for the proposed Project, including a discussion of the notification process for the Draft EIR.

### II. Summary

This section includes a brief overview of the proposed Project, a summary of the environmental impacts and mitigation measures for each environmental issue area covered within the scope of the Draft EIR and a discussion of Project alternatives. This section also describes issues presented in letters and the public

meeting transcript that were received by the Authority in response to the Draft EIR. Changes to the Draft EIR Summary resulting from public and agency comments are reflected in the text in the Final EIR Summary. Therefore, the Final EIR Summary supercedes the Summary section of the Draft EIR.

### III. Mitigation Monitoring Program

This section includes a list of the mitigation measures presented in the Draft EIR, or developed in response to agency or public comments. The listed mitigation measures include detailed information with respect to the Authority's policies and procedures for the implementation of the recommended mitigation measures. This Mitigation Monitoring Program (MMP) identifies the monitoring phase, the enforcement phase and the applicable public agency or department that is responsible for ensuring each recommended mitigation measure is implemented. Under CEQA Guidelines Section 15126.4, mitigation measures are measures that would minimize significant adverse environmental impacts. According to Section 15126.4, mitigation measures must be fully enforceable through permit conditions or other legally binding agreements, which in the case of the Grand Avenue Project, is the MMP. The MMP does not list the Project Design Features that were identified in the Draft EIR since these features are part of the Project and are not developed in response to an identified significant environmental impact. The Project Design Features are intended to point out those features of the Project that would provide a beneficial effect with respect to the respective impact issue. Regulatory Measures listed in the Draft EIR are also not incorporated into the MMP, since such measures are duly enforced through existing rules and regulations. Regulatory Measures are provided in the Draft EIR to document the Project's mandated compliance with applicable local, state and federal laws.

### IV. Corrections and Additions

This section provides a complete overview of the corrections and additions that have been incorporated into the Draft EIR in response to the comments submitted during the public review period. This section also reflects changes to the Draft EIR that result from clarifications requested in public and agency comments. The corrections and additions have not resulted in any changes to the conclusions of the analysis of environmental impacts.

### V. Responses to Comments

This section includes detailed responses to the comment letters submitted to the Authority in response to the Draft EIR as well as to the comments received during the public meeting held on July 18, 2006. Copies of the original comment letters and the transcript of comments at the public meeting are included in Appendix A to this Final EIR.

# I. Introduction

# I. INTRODUCTION

The proposed development of the Grand Avenue Project (the "Project") consists of the creation of a revitalized Civic Park that expands upon the existing Los Angeles Civic Center Mall; streetscape improvements along Grand Avenue between Fifth Street and Cesar E. Chavez Avenue to attract and accommodate more pedestrian traffic; and development of five parcels, all of which are located within the Bunker Hill Redevelopment Project Area. The five parcels are hereafter referred to as Parcels Q, W-1, W-2, L and M-2. Parcels Q and W-2 are currently owned by the County of Los Angeles (County), Parcels L and M-2 are currently owned by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). Parcel W-1 is owned by a private third party and may be acquired by Related Companies, L.P. or its development entity, Grand Avenue L.A., LLC.

To facilitate development of these parcels, the County and the CRA/LA formed a joint powers authority known as the Los Angeles Grand Avenue Authority (Authority) pursuant to a Joint Exercise of Powers Agreement. That agreement designates the Authority as the Lead Agency for purposes of review under the California Environmental Quality Act (CEQA) since, among other reasons; the Authority is responsible for obtaining ground leases from the County and CRA/LA for the four parcels and subleasing to the Related Companies for development of the parcels. The County and CRA/LA will act as Responsible Agencies under CEQA.

The Project Site is located in downtown Los Angeles. The Project site consists of the Grand Avenue right-of-way, between 5th Street and Cesar E. Chavez Avenue; the Los Angeles Civic Center Mall, and a surface parking lot between Spring Street and Grand Avenue, and five non-contiguous parcels located in the Bunker Hill Redevelopment Project Area.

The Project consists of two development options: the Project with County Office Building Option and the Project with Additional Residential Development Option. Under the Project with County Office Building Option, up to 2,060 residential units, including up to 412 affordable units; up to 449,000 square feet of retail floor area; up to 275 hotel rooms; and a County Office Building containing up to 681,000 square feet, would be constructed. Under the Project with Additional Residential Development Option, up to 2,660 residential units, including up to 532 affordable units; up to 449,000 square feet of retail floor area; and up to 275 hotel rooms would be constructed. The County Office Building would not be constructed under the Project with Additional Residential Development Option. The maximum total floor area to be developed under both options is 3.6 million square feet. The proposed project was reviewed by the Grand Avenue Authority, which determined that the proposed Project required the preparation of an Environmental Impact Report (EIR). The Authority prepared an Initial Study evaluating and identifying the areas of potential impact in accordance with Appendix G of the CEQA Guidelines. Based on the conclusions of the Initial Study that the Project could result in a significant impact to the environment, the Authority, in accordance with the requirements of CEQA Section 21080.4 and CEQA Guidelines Section

15082, issued a Notice of Preparation (NOP) on September 6, 2005, regarding the preparation of a Draft EIR for the proposed Project. The purpose of the NOP was to solicit comments on the proposed content of the Draft EIR (see Appendix A to the Draft EIR). The NOP was circulated for a period of 35 days, until October 10, 2005, five days longer than the statutory 30 days. The NOP mailing list included all owners and occupants within 500 feet of any part of the Project site, all potentially affected public agencies, and a list used by the CRA/LA with additional names provided by the Grand Avenue Committee. A total of approximately 5,000 copies of the NOP were distributed to the public. The NOP was also circulated to the State Clearinghouse and posted in the office of the Los Angeles County Clerk on September 6, 2005, in accordance with Public Resources Code Section 21092.3.

The Authority conducted an open house and public scoping meeting on September 20, 2005, from 6:00 to 8:00 P.M. Approximately 45-50 people were in attendance and 12 people spoke. Response forms were available at the public meeting to provide an alternative means of responding to the scoping notice. All NOP responses relating to the EIR were reviewed and the issues raised in those responses were addressed, to the extent feasible, in the Draft EIR.

Upon the completion of the Draft EIR, on June 14, 2006, the Authority, in accordance with the requirements of CEQA Section 21092, and CEQA Guidelines Sections 15085 and 15087, prepared and distributed the Notice of Completion and Availability of the Draft EIR to the State Clearinghouse, and to all interested agencies, parties, organizations, and persons. The Notice of Completion and Availability of the Draft EIR was also posted with the Los Angeles County Clerk in accordance with all CEQA requirements. Copies of the Draft EIR itself, were also distributed to the State Clearinghouse, in accordance with all CEQA requirements and potentially affected public agencies. In addition, the Draft EIR was available for review at the offices of the CRA/LA, at the County of Los Angeles, and at public libraries within the vicinity of the Project site. The Notice was also posted and available for review on the Grand Avenue Committee's website. The Draft EIR was circulated for a 50 day review period, between June 14, 2006 and August 3, 2006, which is 5 days longer than the public comment period required under CEQA.

On June 14, 2006, the Notice of Completion was mailed to approximately 5,000 owners, occupants, and agencies, and was published in the Los Angeles Times. Notices were sent to all owners and occupants within 500 feet of the entire Project area. In addition, 112 Notices were mailed via Certified Mail to recipients, which included the LADWP, the LADOT, the Native American Heritage Commission, the CRA/LA, and such. The Notice was also sent to all persons who made comments at the September 20, 2005 scoping meeting, if their addresses were known. The Notice of Completion mailing list also included a list used by the CRA/LA, with additional names provided by the Grand Avenue Committee. The Authority also sent the Notice of Completion and copies of the Draft EIR to the Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, which distributed the Draft EIR to

selected state agencies for review. Please refer to Section II. F. Public Review Process, for details regarding the distribution and availability of the Draft EIR both electronically and in hard copy.

In addition to information regarding the availability of the Draft EIR, the Notice of Completion provided information of an open house and public meeting as an additional means to obtain information on the Project and to provide comments on the content of the Draft EIR. The Notice of Completion stated that public participation was welcome and voluntary. The public meeting was held on Tuesday, July 18, 2006, between 6:00 P.M. and 8:00 P.M. at the Cathedral of Our Lady of the Angels Center at Cathedral Plaza. The Notice of Completion also provided information that attendance at the public meeting was not necessary in order to make comments on the Draft EIR, and that written comments needed to be submitted to the Authority by August 3, 2006, as described in the Notice of Completion.

The Authority received 17 letters from agencies, organization, and individual parties commenting on the Draft EIR. At the public meeting, thirteen speakers presented oral comments with reference to the Draft EIR. In addition, one written comment form was submitted to the Authority. During the public review period for the Draft EIR and prior to the public meeting on July 18, 2006, the Authority sponsored a public outreach program held on Wednesday, June 21, 2006, to disseminate information about the Project, with a focus on the Civic Park, and to receive public input. A second public outreach meeting was held on Saturday, August 19, 2006, also focused on the Civic Park, after the close of the EIR review period. The June 21st outreach program was an all-day event held in the Civic Center Mall Court of Flags from 11:00 A.M. to 8:00 P.M. Approximately 150 people attended throughout the morning and afternoon and 200 people attended the evening workshop. The program was advertised via hand delivered flyers to the downtown's civic buildings, including the City Hall, the Superior Court, the Criminal Court Building, Caltrans, the Hall of Administration and others. Flyers were also distributed from the Starbucks that is located in the Civic Mall and to the Downtown Neighborhood Council. Flyers were printed in English and Spanish. Approximately 2,000 e-mails were distributed with both English and Spanish translation. The meeting was also advertised by newspaper and radio. Advertisements were placed in English in the *Downtown News* and *the LA Watts Times*, in Japanese in *Rafu Shimpo*, in Spanish in *La Opinion*, in Chinese in the Sing *Tao Daily*, and in Korean in the *Korea Central Daily*. An interview with respect to the Project was aired on All Things Considered on KCRW and KPCC on June 20, 2006. An open house was also held for the public on October 7, 2006 as part of the Grand Avenue Festival. Design team members were available throughout the day to explain the Project and hear public input. Models and drawings were available for the public to review.

Prior community outreach workshops with regard to the Project had been held in October and November of 2004, as well as in January, February and August of 2005, and in May 2006 in various communities throughout the Los Angeles area, including downtown Los Angeles, South Los Angeles, East Los Angeles, the San Fernando Valley, and Westwood/Hollywood.

## CEQA-REQUIRED CONTENTS OF THE FINAL EIR

Before approving this project, CEQA requires the lead agency to prepare and certify a Final Environmental Impact Report (Final EIR). The contents of a Final EIR are specified in Section 15132 of the State CEQA Guidelines, as follows:

> "The Final EIR shall consist of:
>
> (a) The Draft EIR or a revision of the Draft.
>
> (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
>
> (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
>
> (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
>
> (e) Any other information added by the lead agency."

The lead agency must provide each public agency that commented on the Draft EIR with a copy of the lead agency's proposed response at least 10 days before certifying the Final EIR.

# II. Summary

# II. SUMMARY

## A. PROJECT DESCRIPTION

### Project Location and Overview

The Grand Avenue Project is located in downtown Los Angeles in the Bunker Hill and Amended Central Business District Redevelopment Project Areas. The portion of the downtown area in which the Project is located is generally bounded by Cesar E. Chavez Avenue on the north, Spring Street on the east, the Harbor Freeway (I-110) on the west, and Fifth Street on the south. Since the Project is comprised of several components, its geographic range incorporates a relatively broad area. The proposed Grand Avenue streetscape component of the Project is located on Grand Avenue between Fifth Street on the south and Cesar E. Chavez Avenue on the north. The proposed Civic Park component is an expansion and upgrade of the existing Civic Mall, in a mid-block area bordered by public buildings to the north and south, which, themselves, front on Temple Street to the north and First Street to the south. The proposed Park is within the CRA/LA's Amended Central Business District Redevelopment Project Area boundaries. Spring Street and Grand Avenue border the east and west ends of the park, respectively. The Civic Mall is located within the north sector of the Amended Central Business District Redevelopment Project Area, which is generally bounded by the Hollywood Freeway on the north, Alameda Street on the east, First Street to the south, and the Harbor Freeway on the west. The development component of the Project would occur across five parcels located within CRA/LA's Bunker Hill Redevelopment Project Area. The Bunker Hill Redevelopment Project comprises a geographic area bounded by First Street on the north, Hill Street on the east, a varying boundary between Fourth and Fifth Street on the south and the Harbor Freeway on the west.

The Project consists of the following three components: (1) the creation of the 16-acre Civic Park that builds upon and expands the Civic Mall and upon its completion would connect the Los Angeles City Hall to Grand Avenue; (2) streetscape improvements along Grand Avenue from Fifth Street to Cesar Chavez Avenue for the purpose of attracting and accommodating more pedestrian traffic; and (3) development of five parcels, which are referred to as Parcels Q, W-1/W-2, L and M-2. Related Companies (the "Developer") is proposing a wide range of land uses in order to create a diversity of on-site activity that responds to the future needs and demands of the southern California economy. In order to respond to these demands, the Project consists of two development options, referred to as the "Project with County Office Building Option" and the "Project with Additional Residential Development Option." Under the Project with County Office Building Option, development of the five parcels would consist of up to 2,060 residential units, 20 percent of which (up to 412 units) would be provided as affordable housing; up to 275 hotel rooms; up to 449,000 square feet of retail space; up to 681,000 square feet of County office space, and up to 5,035 parking spaces. Under the Additional Residential Development Option, the 681,000 square feet of County office space proposed for Parcels W-1/W-2 would be replaced

by up to 600 additional residential units, 20 percent of which (up to 120 units) would be provided as affordable housing. All other components of the proposed Project would be unchanged under the Project with Additional Residential Development Option. Thus, the land use development proposed under the Additional Residential Development Option consists of up to 2,660 residential units, 20 percent of which (up to 532 units) would be provided as affordable housing, up to 275 hotel rooms, up to 449,000 square feet of retail uses, and up to 5,255 parking spaces. No County office development would occur under the Project with Additional Residential Development Option. For the purposes of this EIR, these two development options are collectively referred to as the "Project." This approach to defining the Project is required as the County of Los Angeles has reserved the right to potentially develop an office building within the Project site. Since the term of the County's option for a public office building will extend beyond the completion date of the EIR, it is necessary to analyze the Project with, as well as without, the development of the County office building. Should the County choose not to develop the office building within the Project site, the Developer is currently planning for additional residential uses to be developed.

In order to fully respond to the future needs and demands of the Southern California economy, the proposed Project includes an Equivalency Program that would allow the composition of on-site development to be modified to respond to future needs in a manner that would not increase the Project's impacts on the environment. The Equivalency Program would provide flexibility for modifications to land uses and square footages within the five parcels. Within this framework, land uses can be exchanged for certain other permitted land uses so long as the limitations of the Equivalency Program are satisfied and no additional environmental impacts occur. All permitted Project land use increases can be exchanged for corresponding decreases of other land uses under the proposed Equivalency Program.

Since publication of the Draft EIR, the Developer is considering the possibility for the Project with Additional Residential Development Option of locating up to 15 percent of the parking spaces for Parcel Q (up to 227 spaces) off-site, but within one or two blocks of Parcel Q, to the extent such spaces are available for use in existing parking facilities. For the reasons discussed in Section I.2.a, below, no new significant impact would occur due to this minor change in the parking arrangements for the Project.

**Surrounding Land Uses**

The proposed Project is located in the northwest area of downtown Los Angeles, within the Bunker Hill Redevelopment Project area and the Civic Center area. Downtown Los Angeles serves as the center of commerce and government for the region. In addition to city, county, state, and federal offices, downtown Los Angeles contains a concentration of regional commercial enterprises and is comprised of several distinct commercial or mixed-use neighborhoods, including the Bunker Hill Redevelopment Project, Civic Center, the Financial District, the Historic Core, the Sports and Entertainment District, the South Markets, South Park, and others. Residential neighborhoods in downtown Los Angeles are generally located in mixed use areas including Bunker Hill, west of Grand Avenue and the South Park

area, which is generally south of Eighth Street. Residences are also located in mixed commercial areas, including Chinatown, Little Tokyo, and the Los Angeles Sports and Entertainment District.

The Bunker Hill Redevelopment Project is a mixed-use area generally bounded by the Harbor Freeway, Fifth Street, Hill Street, and First Street, in which lands containing formerly dilapidated buildings were re-subdivided and replaced by modern streets and infrastructure. Merging with Bunker Hill's high-rises is the City's Financial District, a modern, high-rise cluster of bank and other commercial towers ranging from 28 to 73 stories within an area centered on Flower Street and generally bounded by Fifth and Seventh Streets on the north and south and Olive Street and the Harbor Freeway on the east and west. This district has generally developed over the past 25 years in concert with the redevelopment of Bunker Hill.

The Civic Center comprises the Civic Center Mall and government facilities that front on Temple and First Streets, between Alameda Street and Grand Avenue. The City's Historic Core is the location of the City's former Central Business District and old banking district, containing the City's first large department stores, and large movie houses. This area is generally located on Broadway and Spring Street, between Fourth and Sixth Streets. The Sports and Entertainment District, which is adjacent to the Convention Center and STAPLES Center, is located in the southwest sector of Downtown Los Angeles. This area is intended as a catalyst for activity on a local, as well as regional, level and, as such, proposes to include a range of land uses, including hotels, retail shops, services, and housing. The South Markets, a hub for manufacturing and wholesaling, are located in the southeast quadrant of downtown Los Angeles.

With regard to the Project site itself, adjacent and nearby land uses include high-rise office buildings to the south; cultural uses, such as the Walt Disney Concert Hall, the Los Angeles Music Center, the Museum of Contemporary Art (MOCA) and Colburn School of Performing Arts along Grand Avenue; and government buildings, such as the Los Angeles City Hall, the County's Kenneth Hahn Hall of Administration and the Hall of Records as well as the Los Angeles County/Stanley Mosk Courthouse north of First Street. Surrounding residential land uses include the Grand Promenade Tower to the south of Parcels L and M-2; Bunker Hill Towers and Promenade Plaza to the west/northwest of Parcels L and M-2, and Angelus Plaza and Museum Tower to the south of Parcels Q and W-1/W-2. The residential uses in this area are generally high-rise, ranging from 17 stories (Angelus Plaza) to 32 stories (Bunker Hill Tower). Low-rise residential uses are located to the north of Cesar E. Chavez Avenue.

## Project Goal and Objectives

Section 15124(b) of the State of California Environmental Quality Act (CEQA) Guidelines states that the Project Description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project."

The underlying purpose, or goal, of the Grand Avenue Project as well as its supporting objectives are as follows.

### GOAL

- The ultimate goal of the Grand Avenue Project is to provide an economically viable, architecturally distinguished, community- oriented, mixed-use development with welcoming public open spaces that will create, define, and celebrate the Civic and Cultural Center as a regional destination in downtown Los Angeles.

### OBJECTIVES

#### Priority Objectives

- Create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting both residents and visitors, day and night, through a mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill.

- Implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design, in order to create a pleasant living and working environment.

- Generate at least $50 million in funds from the earlier phases of the project itself, and at least $45 million from Phase 1, by the lease of public land, and use these funds to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve as a public gathering place for the entire region.

- Ensure that 20 percent of all residential units in the project are affordable units for low-income residents.

- Create a long-term stream of additional tax revenues for the City, the Community Redevelopment Agency and the County.

**All Objectives**

Generate Specific Public Benefits

- Generate at least $50 million in funds from the project itself, and at least $45 million from Phase 1, by the lease of public land, and use these funds to improve and extend the existing Los Angeles County Mall into a Civic Park that can serve as a public gathering place for the entire region.

- Create a long-term stream of additional tax revenues for the City, the Community Redevelopment Agency and the County.

- Ensure that 20 percent of all residential units in the project are affordable units for low-income residents.

- Expand upon the recent success of projects on Grand Avenue such as the Walt Disney Concert Hall, the Cathedral of Our Lady of the Angels, the Museum of Contemporary Art, Colburn School of the Performing Arts and other projects, by developing four publicly-owned parcels of land at the top of Bunker Hill, whereby the property owners and a private developer work together to create a project of regional impact which generates significant benefits for the public.

- Create public spaces on the development sites that enhance the attractiveness of the project and that are open and accessible to the public.

- Increase economic activity in the Project area, including the provision of new permanent jobs and the creation of a significant number of construction jobs.

- Create a more welcoming environment for the community and visitors to the center of the city, increasing the number and diversity of patrons to the cultural and commercial attractions of the Bunker Hill Redevelopment Project area.

- Increase the value of the underlying, publicly owned real estate while minimizing public investment in the project.

- Continue the transformation of the Bunker Hill area into a significant high-rise urban environment in downtown Los Angeles by development of the last major undeveloped, underutilized sites in the Redevelopment Project area.

Activate Downtown Los Angeles

- Create a vibrant, 24-hour development that activates the Civic and Cultural Center by attracting more people, day and night, through a mix of uses that are economically viable, that complement each other, and that add to those that already exist on Bunker Hill.
    - Develop a substantial amount of housing, inclusive of affordable housing, in order to expand the diversity of downtown living options.
    - Provide an exceptional hotel within the development to serve and enhance the multifaceted visitor related activities and destinations in the Project area.
    - Provide retail and entertainment uses in a distinctive mixed-use environment to serve and welcome residents as well as visitors from throughout the region and beyond.
    - Provide public parking at a reasonable rate that will attract the public to the Grand Avenue area as well as to the retail, entertainment, and hotel uses within the project.
    - Allow for the possibility of County office use within the later phases of the project.
    - Program and design the project to appeal to various market segments and residents of surrounding neighborhoods.
- Create a northern anchor for the downtown area to complement the southern anchor at "LA Live" to create a more diverse and vibrant downtown core.

Create a Civic Gathering Place

- Improve and expand the existing Los Angeles County Mall into a Civic Park so that it can be operated to serve as an active, welcoming setting for daily activity as well as a gathering place for community celebrations, cultural and ethnic celebrations, festivals, holiday events, political gatherings and the like.
- Improve both pedestrian and visual access to the park through the elimination of barriers such as the parking garage ramps at Grand Avenue and at Hill Street.
- Provide for functional and attractive linkages through the park connecting neighborhoods, government facilities, office uses, and retail uses located in proximity to the east of the project area with Grand Avenue.

Enhance Pedestrian Connections

- Provide a design that emphasizes pedestrian and public transit opportunities, and that integrates linkages between pedestrian, public transit and the public roadways.

- Encourage pedestrian movement in the vicinity of Grand Avenue, providing easy access to and from the Cathedral, the Music Center, the Civic Park, the Walt Disney Concert Hall, the Colburn School, MOCA, the new Central High School No. 9 (soon to be under construction), the proposed development project, the various courthouses, and the County and City seats of government.

- Encourage the use of public transportation to and from the downtown through the use of appropriate bus, train, and other transit systems such as the existing Metro Red Line Civic Center Station, and through Red Line connections to Union Station and the region by commuter train, as well as by regional bus transit and local bus transit.

- Create an attractive pedestrian connection from the Civic Center, south to the Financial District, integrating the Civic Park and Grand Avenue into the overall downtown context.

Create Distinguished Architectural Design

- Create an architecturally distinguished project which meets the level of quality of neighboring buildings such as: the Walt Disney Concert Hall, the Cathedral of Our Lady of the Angels, the Music Center, the Museum of Contemporary Art, the Colburn School for the Performing Arts, the Caltrans Building, and the future high school for the arts to be located on Fort Moore Hill.

- Build to high densities and create a critical mass of activity in order to energize the Cultural and Civic Center.

Facilitate Achievement of Redevelopment Goals for the Bunker Hill and the Central Business District

- Implement redevelopment plan objectives to permit a maximum density of development commensurate with the highest standards of architecture and landscape design, in order to create a pleasant living and working environment.

- Improve the jobs/housing balance downtown.

- Contribute to the goal of creating a world class downtown and assist in the development of downtown as a major center of the Los Angeles metropolitan region.

- Create synergies between the City, the Community Redevelopment Agency and the County to improve properties in the Redevelopment Project areas.

- Implement redevelopment plan objectives to provide that the proposed residential area of the project be developed to provide housing, among others, for workers who seek a living environment near their places of work as well as near the available cultural, educational and entertainment facilities.

- Implement redevelopment plan objectives by contributing to the creation of a plan of land use of great benefit to the people of the entire Los Angeles metropolitan area; by the provision of facilities in large demand for modern, convenient, and efficient living accommodations for downtown employees and by changing a tax liability to a tax asset for the people of the City and County by increasing the tax revenue many times.

- Implement the current Design for Development for the Bunker Hill Redevelopment Project by implementing the principle that Bunker Hill has a unique and strategic location between the Central Business District and the Civic-Cultural Center and can play a role as an essential element of the core of the Central City by accommodating a variety of land uses and the full range of activities associated with a vital urban core, including commercial offices with supporting retail, entertainment, dining, transient housing with convention and exhibition facilities, and in-town residential uses.

- Establish vibrant neighborhoods containing a variety of housing types and community facilities.

- Promote a pedestrian network within a framework that accommodates large buildings and a variety of open spaces.

- Achieve excellence in design, giving emphasis to parks, green spaces, street trees, and places designed for walking and sitting.

- Link Bunker Hill and surrounding neighborhoods and districts through a coherent pedestrian network.

## B. INTENDED USES OF THE EIR

This EIR has been prepared at the direction and under the supervision of the Los Angeles Grand Avenue Authority in accordance with Section 15161 of the State CEQA Guidelines and, as such, serves as an informational document for the general public and the Project's decision-makers. The Grand Avenue Authority is the Lead Agency for the Project, and under CEQA Statute Section 21067, is responsible for the preparation and distribution of the EIR and preparation of this Final EIR. The County and CRA/LA will act as responsible agencies under CEQA. As Lead Agency the Authority is responsible for the preparation and distribution of this Final EIR.

This EIR shall be used in connection with all other permits and all other approvals necessary for the construction and operation of the Project. The EIR, which consists of both the Draft and Final EIRs shall be used by the Authority, the CRA/LA, the Los Angeles County Board of Supervisors, the City of Los Angeles City Council, as well as the City's Department of Planning, Department of Building and Safety, Department of Transportation, and Department of Public Works, including the Bureaus of Engineering and Sanitation, City Council of the City of Los Angeles, and all other public agencies that must approve activities undertaken with respect to the Project.

## C. ANTICIPATED PUBLIC AGENCY ACTIONS

Permits and approvals required for development of the Project are anticipated to include, but may not be limited to, the following:

**Los Angeles Grand Avenue Authority**

- Approval of ground subleases for Parcels Q, W-2, L and M-2 from the Grand Avenue Authority to the Developer.
- Approval of a Disposition and Development Agreement (DDA) between the Grand Avenue Authority and the Developer.

**Community Redevelopment Agency**

- Approval of ground leases for CRA-owned Parcels L and M-2 from the CRA/LA to the Grand Avenue Authority and the sub-lease of these parcels to the Developer.
- Approval of ground leases for Parcels Q and W-2 from the County to the CRA/LA, the sub ground leases to the Grand Avenue Authority and the sub ground leases by the Grand Avenue Authority to the Developer.

- Approval of various agreements, bonds and security instruments for potential public financing for the affordable housing, public parking, and public infrastructure improvements in connection with the Project.

- Amendment of the 1991 approved Owner Participation Agreement between the CRA/LA and the County for Parcels K, Q and W-2.

- Approval of the DDA between the Authority and the Developer.

- Approval of land uses and design review as permitted under the Redevelopment Plans and DDA.

- Approval of development of residential uses in areas designated as commercial under the Bunker Hill Redevelopment Plan.

**County of Los Angeles**

- Approval of ground leases for County-owned Parcels Q and W-2 to the CRA/LA, for further subleases to the Authority and the Developer for the Project.

- Approval of the DDA between the Authority and the Developer.

- Amendment of the 1991 Owner Participation Agreement between the CRA/LA and the County for Parcels K, Q, and W-2.

**City of Los Angeles**

- Under the City's oversight authority over the CRA/LA, approval of certain CRA/LA actions listed above, including, but not limited to, approval of the DDA, financing and leases.

- Approval of a Development Agreement (DA) between the City of Los Angeles and the Developer.

- Approval of Subdivision Map for the five Parcels Q, W-1/W-2 and L/M-2.

- Approval of a Zone Change for those portions of Parcels Q, W-1/W-2 and L/M-2 that are zoned from R5/C2 to C2 to: (a) authorize the commercial uses proposed by the Project (e.g., hotel, retail, etc.); (b) eliminate the need for multiple conditional use permits and variances (concerning, for example, hotel use, parking requirements, commercial circulation, signage and alcohol service in the portions of the parcels currently zoned R5), and (c) establish a

single zoning designation for Parcels Q and W-1/W-2 allow hotel use, public parking, commercial circulation, signage, and alcohol service in the portions of the five parcels currently zoned R-5.

- Approval of a Conditional Use Permit (CUP) to deviate from the current "D" restriction and exceed an FAR of 6:1.
- Approval for deviation of a Policy Deviation from Advisory Agency Policy 2000-1, which addresses standards for new condominiums and specifies a parking requirement higher than the LAMC.
- Approval of a Street Vacation (airspace) for the proposed Olive Street pedestrian bridge and General Thaddeus Kosciuszko Way tunnel if not within a tentative tract map.
- Approval of a Zone Variance to allow residential density to exceed the number of units allowed in the C2 zones by 20 percent or greater.
- Approval of a Zone Variance if the Project cannot comply with common and/or private residential open space standards.
- Determination of a Shared Parking Plan to permit two or more uses to share parking spaces, if necessary.
- Approval of a Zone Variance for the Project relative to Yards and Setbacks, for projects that cannot comply with the yard/setback requirements of the C2 Zone.
- Approval of Conditional Use Permits (CUPs) for Alcohol Sales.
- Approval of improvements within the Grand Avenue right-of-way.
- Approval of a Signage District and/or variance concerning parking requirements applicable to affordable housing units (possible future actions).
- Approval of demolition, grading, foundation, and building permits.
- Approval of Street Right-of-Way Dedications along major streets.
- Approval of haul route(s), as necessary.

- Variances and Encroachment permits (irrevocable and revocable) as required for construction within public ways, as well as for installation of public improvements.

- Miscellaneous approvals, as required:

  - Grand Avenue design and construction;

  - Construction within Second Street tunnel easement;

  - Temporary closures of streets and sidewalks;

  - Curb cuts and lane dropoffs;

  - Utilities relocation, replacement, and extension;

  - Sewer line extensions and upgrades;

  - Additional required approvals and permits from the Department of Public Works, Building and Safety, Mechanical Bureau, and other City departments that may be necessary to construct or operate the Project.

  - Approval of the development of residential uses in areas designated as commercial under the Bunker Hill Redevelopment Plan.

## D. BACKGROUND OF THE PROPOSED PROJECT

The Los Angeles Grand Avenue Authority is an independent public agency, established through a Joint Exercise of Powers Agreement between the CRA/LA and the County of Los Angeles. The County and the CRA/LA formed the Grand Avenue Authority as a Joint Exercise of Powers authority responsible for overseeing the implementation of the Project. The Grand Avenue Authority has contracted with the Grand Avenue Committee to provide certain real property negotiating and other related services. The Project's developer, Related Companies, L.P. was selected through a competitive process. The Grand Avenue Implementation Plan, which guides the description of the Project, represents a collaborative effort among the Grand Avenue Authority, the Grand Avenue Committee, and the Related Companies.

## E. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the Authority include issues known to be of concern to the community and additional issues raised by agencies, organization, and individuals during the Draft EIR's public review period. In response to the Project's NOP, issues known to be of concern to the community include traffic, parking, pedestrian linkage, visual quality, air quality, noise, school

capacity, libraries, and hazardous materials. In addition, there are potential impacts on known or potential historic resources in and around the proposed Civic Park. Issues to be resolved include a choice among Project alternatives and, whether, or how, to mitigate significant impacts. Additional areas of concern that were raised in comments on the Draft EIR include construction impacts on the existing uses surrounding the Project site, future activities and access to the proposed Civic Park, construction vehicle travel, emergency access during Project construction and operations, potential impacts on the area's homeless population, the characteristics of the Project's affordable housing and the Project's potential energy impacts. It is important to note that the corrections and additions that are set forth in Section IV, Corrections and Additions, of the Final EIR represent minor factual corrections, clarifications, and/or updates of information that do not affect the conclusions of the Draft EIR.

## F. PUBLIC REVIEW PROCESS

This section of the Final EIR describes the process the Authority undertook to involve the public in the Project's environmental review process. As described below, and in Section I. Introduction, the Project's public outreach efforts were conducted in full compliance with all CEQA requirements.

### Notice of Preparation

Pursuant to the Joint Exercise of Powers Agreement, the Los Angeles Grand Avenue Authority ("Authority") serves as the Lead Agency, as that term is defined under CEQA.

On September 6, 2005, the Authority circulated a Notice of Preparation (NOP) to initiate the "scoping" stage of the Project for the Draft EIR to the State Office of Planning and Research ("State Clearinghouse"), interested parties, organizations and persons as well as to the public agencies that may be concerned with, or have some jurisdiction or expertise in, the environmental effects of the proposed Grand Avenue Project. The Notice of Preparation stated that an open house and scoping meeting concerning the project would be held on September 20, 2005. Further, it stated that comments on the scope and content of the Draft EIR were due by October 10, 2005.

This Notice was posted in the office of the Los Angeles County Clerk on September 6, 2005, in accordance with Public Resources Code Section 21092.3. The NOP was mailed to all owners and occupants within 500 feet of any part of the Project site, all potentially affected public agencies, and to additional names provided by the CRA/LA and the Grand Avenue Committee. A total of approximately 5,000 copies of the NOP were distributed to the public. The Notice was also posted electronically on the website of the Grand Avenue Committee: www.grandavenuecommittee.org.

## Open House and Scoping Meeting Comments

The Authority hosted an open house and scoping meeting on September 20, 2005 to solicit input from on the scope and content of the Draft EIR. This meeting was held from 6:00 p.m. to 8:00 p.m. at the Cathedral of Our Lady of the Angels Center at Cathedral Plaza, 555 West Temple Street in Los Angeles. This site is very close to the Project site and is available by transit and provides on site parking. Approximately 45 - 50 people attended the meeting. The meeting was recorded by a court reporter and was transcribed. Twelve individuals spoke at this session. The transcript of this scoping meeting is included in Appendix A of the Draft EIR.

## Additional Comments on the NOP

During the NOP comment period, Authority staff also held meetings with representatives of responsible agency staffs from the County, CRA and City to address (a) the scope of the EIR and (b) methodology to be used in technical analyses in the EIR. The NOP comment period ended on October 10, 2005. Within the scoping comment period, the Authority received a total of eight written responses from public agencies and six from individuals or businesses.

## Draft Environmental Impact Report

The Draft EIR was completed and made available to the public on June 14, 2006. A "Notice of Completion and Availability of the Draft Environmental Impact Report for the Grand Avenue Project and Notice of a Public Meeting" was issued broadly as required. The Notice was published in the Los Angeles Times on June 14, 2006. It was also mailed directly to owners and occupants within 500 feet of the project area, with approximately 5,000 notices sent by first class mail. The Notice was also posted electronically on the website of the Grand Avenue Committee: www.grandavenuecommittee.org.

The Draft EIR was made available both electronically and in hard copy. Hard copies were distributed to approximately 150 public agencies, including the State Clearinghouse, to the public and private institutions adjacent to the project site, and were made available for review by the public at the following locations:

The Community Redevelopment Agency
of the City of Los Angeles
Records Department, 5th Floor
354 South Spring Street
Los Angeles, CA 90013-1258

County of Los Angeles
Public Information Counter
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 358
Los Angeles, CA 90012

Los Angeles Central Library
630 West Fifth Street
Los Angeles, CA 90071

Little Tokyo Branch Library
203 South Los Angeles Street
Los Angeles, CA 90012

Chinatown Branch Library
639 North Hill Street
Los Angeles, CA 90012

An electronic copy of the Draft EIR was also available through a link on the Grand Avenue Committee website at: http://www.pcrnet.com/GrandAve/index.htm. Further, CD-ROM versions of the complete Draft EIR were also available for purchase through the Grand Avenue Committee.

**Public Review of the Draft EIR**

The Draft EIR public review period started on June 14, 2006 and ended on August 3, 2006, providing 50 days of public comment on the Draft EIR. The Notice of Completion (NOC) that announced the availability of the Draft EIR to interested agencies, parties, organizations and persons, also provided information that an open house and public meeting would be held during the Draft EIR's public review period for the purpose of providing an additional means for the public to obtain information on the Project and to provide comments on the content of the Draft EIR. The NOC stated that public participation at the public meeting was welcome and voluntary. The public meeting was held on Tuesday, July 18, 2006 from 6:00 to 8:00 P.M. at the Cathedral of Our Lady of the Angels Center at Cathedral Plaza, 555 West Temple Street, Los Angeles.

The NOC also provided information that attendance at the public meeting was not necessary in order to make comments on the Draft EIR and that written comments may be sent to the Authority as described in the NOC. As indicated in the NOC, oral comments presented at the public meeting were recorded and comment forms were also available at the public meeting to provide yet another alternative means of commenting on the content of the Draft EIR. During the 50-day comment period, which concluded on August 3, 2006, 17 letters were received from agencies, organizations, and individual parties commenting on the Draft EIR. In addition, 13 people spoke at the public meeting on July 18, 2006, and one agency submitted a written comment at that meeting. Copies of the written comments and the transcript of comments at the public meeting are included in Appendix A to this Final EIR. Responses to all of these comments are included in this Final EIR in Section V, Response to Comments.

**Final Environmental Impact Report**

Following the submission of comments on the Draft EIR, the Final EIR was prepared. At the completion of the Final EIR, a Notice of Availability (NOA) will be distributed and the document will be made available both in hard copy and electronic form. In keeping with the process established with the Draft EIR, it is the intent of the Authority to broadly issue and distribute the Notice of Availability for the Final EIR as well.

Hard copies of the Final EIR will be made available for review by the public at the following locations:

The Community Redevelopment Agency
of the City of Los Angeles
Records Department, 5th Floor
354 South Spring Street
Los Angeles, CA 90013-1258

County of Los Angeles
Public Information Counter
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 358
Los Angeles, CA 90012

Los Angeles Central Library
630 West Fifth Street
Los Angeles, CA 90071

Little Tokyo Branch Library
203 South Los Angeles Street
Los Angeles, CA 90012
Chinatown Branch Library
639 North Hill Street
Los Angeles, CA 90012

An electronic copy of the Final EIR also will be available through a link on the Grand Avenue Committee website at: http://www.cajaeir.com/portfolio/grand.html. Further, CD-ROM versions of the complete Draft and Final EIR will be available for purchase through the Grand Avenue Committee.

Copies of the Final EIR which includes all responses to comments on the Draft EIR submitted during public review will be provided to public agencies which submitted comments on the Project no less than ten days prior to the consideration of the Project by the Grand Avenue Authority. In addition, others who commented on the Draft EIR will also receive the Final EIR, to the extent that addresses were provided with their comments.

No final actions (e.g., approval or denial) will be taken on the Project until the Final EIR has been reviewed, certified as complete, and considered by the appropriate decision-makers. Dates of public meetings and/or hearings will be published and officially noticed in accordance with all legal requirements.

## G. SUMMARY OF ALTERNATIVES

### Alternative 1: No Project "A"

CEQA Guidelines Section 15126.6 (e)(3)(B) states that the "No Project" alternative is "a circumstance under which a project does not proceed and may be considered "the environmental effects of the property remaining in its existing state." The No Project "A" Alternative assumes that the Project would not be developed and that the existing land uses within the Project Site would remain as they are today (i.e., unchanged). As a result, under Alternative 1, the streetscape improvements on Grand Avenue would not occur, improvement and expansion of the existing Civic Center Mall would not occur, and Parcels Q, W-1/W-2, L, and M-2 would remain as parking lots. Thus, this alternative would produce no change to the existing physical condition and use of the overall Project site.

**Alternative 2: No Project "B"**

CEQA Guidelines Section 15126.6 (e)(3)(C) sets forth the provisions for analyzing the No Project Alternative under a different set of assumptions than those identified above for Alternative 1. Under this CEQA Guidelines Section, the No Project Alternative is defined as what "would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Under No Project "B" Alternative, Parcels Q and W-2 would be developed according to the provisions of the 1991 Owner Participation Agreement (OPA) for the development of Parcels K, Q and W-2, Bunker Hill Urban Renewal Project, while Parcels L/M-2 and W-1 would be developed per existing zoning. Per the 1991 OPA, Parcel Q would be developed almost entirely with office uses along with a relatively limited amount of retail uses, while Parcel W-2 would remain as a parking facility, albeit somewhat larger than what currently exists.

Parcels L and M-2 would be developed according to their existing R5-4D zone and Parcel W-1 would be developed according to the existing R5-4D and C2-4D zones. Based on these land use parameters, the No Project "B" Alternative would include development of up to 843 residential units, including 169 affordable units; approximately 64,641 square feet of retail floor area; and approximately 1,565,792 square feet of office floor area. Approximately 400 parking spaces would occur on Parcel W-2. Furthermore, under the No Project "B" Alternative, the proposed improvement and expansion of the existing Civic Center Mall would not occur and the proposed streetscape improvements along Grand Avenue would only be implemented in front of Parcel Q.

**Alternative 3: Reduced Density Alternative**

The Reduced Density Alternative represents a 25 percent reduction of proposed development within Parcels Q, W-1/W-2 and L/M-2. Under the Reduced Density Alternative, the Civic Park would be developed and the streetscape improvements implemented. However, the level of improvements made to the Civic Park and the extent of the streetscape improvements would be reduced commensurate with the reduced funding for Phase 1 that would be available from pre-paid revenues. While the mix of office, retail and residential uses across the development Parcels under the Reduced Density Alternative would be the same as under the Project, the floor area associated with each use would be reduced by 25 percent. Thus, the Reduced Density Alternative would result in up to 1,545 residential units, of which 309 would be available as affordable units, 336,750 square feet of retail floor area, 206 hotel rooms, and a 510,750-square-foot County office building. In addition, under the Reduced Density Alternative, the maximum building heights would also be reduced by 25 percent. While the reduction in building height could occur through a number of different ways, for the purposes of analyzing the Reduced Density Alternative, building heights would be the same as under the Project, although the high-rise buildings would be reduced in height.

**Alternative 4: Alternative Design**

The Alternative Design Alternative was developed in response to the potential significant impacts of the Project with regard to the historical resources currently present within the Civic Center Mall and the Project's significant view impacts for locations that are located south of Parcels L/M-2.

The conclusions of the historical analysis (see Section IV.D of the Draft EIR) are that significant impacts would result if any of the four identified character-defining features are either not retained and reused in a manner consistent with the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings as well as the Guidelines for the treatment of Cultural Landscapes (hereinafter collectively referred to as the Standards); or if the improvements implemented within the Civic Park are not done so in accordance with the Standards. Therefore, for the purposes of analyzing the Alternative Design Alternative, implementation of the Civic Park would only occur in accordance with the Standards. In summary, the four identified character-defining features are as follows: (1) the water feature (both the fountain and pools); (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches; (3) the existing elevator shaft structures located within the center of the park, and (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies. Under this Alternative, the Grand Avenue Streetscape Program would be implemented as under the Project.

In response to the significant view impacts attributable to the towers proposed for development on Parcels L/M-2, the towers under the Alternative Design Alternative would be reversed, such that the tower proposed for the southeast corner of Parcels L/M-2 would be moved to the southwest corner, and the tower proposed for the northwest corner would be moved to the northeast corner. The reversal of the tower buildings would increase the setback between the highest structures on Parcels L/M-2 and the existing, adjacent Grand Tower Promenade residential building. The intent of the increased setback is to open views from the Grand Tower Promenade building towards the north.

Under the Alternative Design Alternative, the same amount of residential and commercial development as the Project with County Office Building Option (3.6 million square feet) would be developed.

**Alternative 5: Alternative Land Use**

Under the Alternative Land Use alternative, the five development parcels would be developed entirely with residential uses, with the exception of 35,000 square feet of retail uses that would be developed to meet the retail shopping needs of onsite residents. This alternative would have the same floor area as the Project with County Office Building Option (3.6 million square feet). Under this alternative, the floor area that would, otherwise, support office, hotel, and retail uses, except for 35,000 square feet, would be converted to residential floor area. The proposed 35,000 square feet of retail uses would be consolidated onto Parcel Q, which is centrally located to Parcels L/M-2 and W-1/W-2. Retail uses may include a

grocery and similar services specifically oriented toward the Project's residents. The number of additional residential units is based on the non-residential floor area in each parcel(s), divided by the average floor area per unit within the applicable parcel. As such, the non-residential floor area on Parcel Q would support an additional 446 units, which when added to the proposed 500 units would equal 946 units. On Parcels W-1/W-2, the non-residential floor area would support an additional 763 units. Added to the proposed 710 units (under the County Office Building Option), a total of 1,473 units would be developed on Parcels W-1/W-2 under the Alternative Land Use Alternative. The non-residential floor area proposed for Parcels L/M-2 would support 103 additional units, for a total of 953 units. On an overall basis, the Alternative Design Alternative would allow a maximum of 3,372 residential units, including 674 affordable units.

Under the Alternative Land Use Alternative, the implementation of the Civic Park and Grand Avenue Streetscape Program would be the same as under the Project.

## H. POTENTIAL ENVIRONMENTAL IMPACTS STUDIED IN THE INITIAL STUDY BUT NOT ANALYZED FURTHER IN THE DRAFT EIR

In accordance with CEQA Guidelines Section 15063, the Authority prepared an Initial Study, which is included as Appendix A to the Draft EIR. The Initial Study determined which potentially significant effects may be caused by the Project and needed to be further examined in the Draft EIR, and which environmental effects would not be caused by the Project and, therefore, required no further analysis in the Draft EIR. Based on that Initial Study and other substantial evidence, the Authority determined that the Project would not have the potential to cause significant impacts in the following areas: (1) agricultural resources, (2) biological resources, (3) geology and soils, (4) hydrology and water quality, and (5) mineral resources, and that it was appropriate that no further analysis of these five environmental issues was included in the Draft EIR.

During the public review process, a comment was raised as to whether the Draft EIR should have undertaken an analysis of the Project's potential energy impacts. No such analysis is warranted for a number of reasons. First, the Initial Study identified the Project's specific amounts of electricity and natural gas consumption, and based on those amounts, concluded that the Project's energy demands would fall within the projected energy demands for the City of Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company (the Gas Company). Accordingly, the Initial Study determined that no further analysis of this issue in the Draft EIR was warranted.

Second, the Project's furtherance of energy efficiency is reflected throughout the Draft EIR. For example, a number of the Project objectives emphasize the pedestrian and public transit opportunities that would be created by the Project, as well as its linkages between pedestrian, public transit and other public

roadways. The Project would also promote energy efficiency through reduced reliance on automobiles, an improvement of jobs/housing balance, and the encouragement of the use of public transportation to and from the downtown area.

Third, the Project's energy demands were disclosed in the Draft EIR (in addition to the Initial Study attached to the Draft EIR). For example, the Project's air quality analysis addresses emissions from fuel consumption by motor vehicles as well as consumption of natural gas and electricity during Project operations. That analysis provides a quantification of the Project's energy consumption.

Finally, the incorporation of "Title 24" (the State's Energy Code) requirements into the Project is reflected in Regulatory Measure F-2, which states: "all residential and non-residential buildings shall, at minimum, meet the California Title 24 Energy Efficiency Standards for water heating, space heating and cooling." Thus, the Project would comply with all requirements of Title 24 applicable to the Project's residential and commercial components. (California's Title 24 is the most restrictive energy code in the nation, and imposes strict standards in order to achieve energy efficiency.) Thus, through compliance with Title 24, the Project would not be energy inefficient or wasteful.

# I. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

## 1. Land Use

a. Environmental Impacts

The Civic Park and the Grand Avenue streetscape program would generate greater public use and activity on the street and in the Civic Park. The proposed Civic Park would be consistent with the surrounding public land uses in the Civic Center and would complement and enhance the increased residential presence and pedestrian activity in downtown. The proposed Civic Park and streetscape program would also be consistent with the goals and objectives of the Central City Community Plan objectives to create civic open spaces for everyday casual use, flexible use of space, accommodations for sizable numbers of people, and a forum for organized public events. The proposed Civic Park and streetscape program would be also consistent with the intent of the Downtown Strategic Plan policies to achieve a high quality of open space at all scales which enhances the quality of life of residents, workers and visitors, and fosters civic pride. The proposed Civic Park would also be consistent with the Civic Center Shared Facilities and Enhancement Plan objective to remove or reconfigure the walls at the Grand Avenue auto ramp for improved visibility and pedestrian access into the Civic Park. The Grand Avenue streetscape program would also enhance adjacent culturally important buildings in support of the Central City Community Plan's designation of Grand Avenue as a "Cultural Corridor."

Development of the Parcels Q, W-1/W-2, L and M-2 under both the Project with County Office Building Option and the Project with Additional Residential Development Option would be consistent in use and scale with surrounding residential and civic land uses, and would provide support to existing cultural uses. The Project's proposed density of residential uses would be consistent with the Los Angeles General Plan Framework's Downtown Center designation as well as related housing and transit policies. The Project would also be consistent with the designations and policies of the Central City Community Plan, the Bunker Hill Redevelopment Plan, the Amended Central Business District Redevelopment Plan, the Bunker Hill Design for Development, the Downtown Strategic Plan, and SCAG's Regional Comprehensive Plan and Guide, by increasing the range of housing choices available to Downtown employees and residents, encouraging a mix of uses which create a 24-hour downtown environment for current residents, to encourage patterns of urban development which make better use of existing facilities and providing housing and retail uses within close proximity to existing transit. Since the Project would be compatible with surrounding uses and consistent with applicable land use plans and policies, it is concluded that the Project's land use impacts relative to land use compatibility and consistency with adopted land use would be less than significant.

Both Project Options would require zone changes and variances to permit the proposed for development of Parcels Q, W-1/W-2, L and M-2. With the granting of such zone changes and variances, which may be granted after certification of the Final EIR by the Lead Agency, and concurrently with action on entitlements requested from the City of Los Angeles, there would be no significant zoning impact. However, since the Project, under both Project Options, would be acted on by the Lead Agency (the Authority) prior to the City's decision on such zoning requests, the Project would not be in compliance with the current zoning provisions at the time of Project approval. Therefore, it is conservatively concluded that for the purposes of CEQA there would be a significant impact relative to zoning.

Proposed construction activities in Civic Center Mall, which would include potential disturbance of native and non-native vegetation, structures, and substrates, have the potential to disturb migratory non-game native birds during the bird breeding season, which generally runs from March 1 through August 31, and as early as February 1 for raptors. To avoid a "take," under the Migratory Bird Treaty Act (MBTA), which includes disturbances that would cause abandonment of active nests containing eggs and/or young, protective measures are recommended to comply with the applicable state and Federal laws pertaining to the protection of native birds b. Cumulative Impacts

Ninety-three related projects are considered to be "related projects" in the Project area for the purposes of the cumulative impacts analysis. Development of the related projects is anticipated to occur in accordance with adopted plans and regulations. Based on the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the area surrounding the proposed Project would implement and support many important local and regional planning goals and policies and State environmental regulations. It is also anticipated that any new projects would be subject

to their own permit approval processes and would incorporate any mitigation measures necessary to reduce potential land use impacts and that no significant impacts with regard to adopted land use plans would occur. However, in as much as the Project would create a significant impact with respect to zoning, and related projects may require a variety of variances and zone changes, it is concluded that cumulative zoning impacts would be significant.

c. Regulatory Measures

Regulatory Measure A-1: Regulatory Measure A-1: Project construction involving of on-site clearance of vegetation, excavation, or other construction activities shall avoid, to the extent feasible, from occurring between March 1 and August 31 (and between February 1 and August 31 for raptors). Prior to the completion of final plans and specifications for the Civic Park, the County Chief Administrative Officer (CAO) or designee shall review the plans and specifications to ensure that the contractor is apprised of the requirements of the Migratory Bird Treaty Act (MBTA) and encouraged to schedule removal or relocation of mature trees and removal of other potential nesting habitat outside of the breeding season. In the event that the identified construction activities must occur within the specified time period, a qualified biologist acceptable to the County Chief Administrative Officer shall complete weekly surveys within the Civic Park site that is subject to disturbance, and within 500 feet of the boundary of such areas, to determine if any protected native birds are present. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If an active nest is located within trees or other habitat scheduled for removal or relocation, or within 300 feet of the construction area, construction shall be suspended within 300 feet of the nest (500 feet for raptor nests) until such time a qualified biologist determines if construction activities are interfering with nesting activities. If construction activities are determined to not interfere with nesting activities, construction may continue with a biological monitor present. Should a tree or other habitat scheduled for removal or relocation be determined to contain an active nest, removal or relocation shall be delayed until the nest is determined to be inactive or a permit is granted by the USFWS for take pursuant to the MBTA.

The distance limits of construction to avoid a nest shall be identified in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area. The County CAO or designee shall record the results of the protective measure above.

d. Level of Significance After Mitigation

The Project would be compatible with the land use found within adjacent and surrounding existing development and, as such, the Project would not create a division or disruption of an established

community. In addition, the Project would be consistent with adopted land use plans, including the General Plan Framework, the Central City Community Plan, the Bunker Hill Redevelopment Plan, and the Southern California Association of Governments' Regional Comprehensive Plan and Guide. Thus, the proposed Project would result in less than significant impacts relative to land use compatibility and adopted land use plans. Both Project Options would require zone changes and variances to allow the development of Parcels Q, W-1/W-2, L and M-2 to occur as proposed. With the granting of such zone changes and variances, which would be granted after certification of the Final EIR by the Lead Agency, and concurrently with action on entitlements requested from the City of Los Angeles, this impact would be reduced to less than significant levels. However, since the Project under both Options is not in compliance with the current designations, it is conservatively concluded that for the purposes of CEQA there would be a significant impact relative to zoning.

**2. Traffic, Circulation and Parking**

a. Project Impacts

Construction

Hauling. Hauling activities during the initial six to eight months of construction of each parcel, when haul trucks would carry excavated material from the site, could generate up to 300 truck trips per day. Because some of these trips would occur in the A.M. peak hour, they would cause a short-term significant impact. Worker trips are expected to be negligible during the peak traffic hours.

Temporary Lane Closures. Complete closures of the public streets in and around the Project site are not expected during construction. However, such closures could occur due to unforeseen circumstances, in which case, they would cause temporary significant impacts. It is expected that, at most, one traffic or parking lane adjacent to the curb of each of the five development parcels may need to be closed at certain locations for periods of up to 4 to 6 months, or up to approximately 18 to 24 months, depending on the stage of construction that is occurring at the time. Although temporary in nature, such lane closures would cause significant traffic impacts during such periods of time. A mitigation measure has been identified to address potential impacts due to temporary lane closures.

Pedestrian Access. Sidewalk closures adjacent to construction sites may be required; in which case, one side of the street would continue to be available for pedestrian access. While the use of these alternative routes may lead to some inconveniences to pedestrians, due to slightly longer walk distances in some cases, it is not expected such increases would result in significant impacts with regard to pedestrian access. Therefore, no significant impacts on pedestrian circulation during construction would occur.

Reconstruction of Civic Mall Ramps. During the reconstruction of the Grand Avenue and Hill Street ramps to the Civic Center Mall garage, traffic would be diverted to the Hill Street ramp during the closure

of the Grand Avenue ramp and to the Grand Avenue ramp during the closure of the Hill Street ramp. The diversion of traffic to alternate garage entrances could potentially create short-term significant traffic impacts.

Bus Stop Relocation. Construction of the Project may also require the temporary relocation of up to five bus stops, which would be relocated within two blocks of the Project site. Therefore, impacts on bus stops would be less than significant.

Construction Worker Parking. An estimated 250 construction workers would be on-site daily, with a peak maximum of about 600 workers. For construction workers who choose to drive to work, it is unlikely that on-site parking would be provided. A mitigation measure has been identified to address potential impacts due to construction worker parking.

Traffic and Circulation

The Project with County Office Building Option would generate approximately 1,551 A.M. peak hour trips and 2,464 P.M. peak hour trips. This Option would result in significant traffic impacts at seven intersections in the A.M. peak hour and in significant traffic impacts at seventeen intersections in the P.M. peak hour. The Project with Additional Residential Development Option would generate approximately 1,019 trips in the A.M. peak hour and 2,003 trips in the P.M. peak hour. These levels of peak hour trip generation are 34 percent and 19 percent lower than the A.M. and P.M. peak hour trip generation levels associated with the Project with County Office Building Option, respectively. The Additional Residential Development Option would result in a significant traffic impact at six intersections in the A.M. peak hour and seventeen intersections in the P.M. peak hour. The Project with County Office Building Option would cause two significant traffic impacts on the freeway system, one of which would occur at a CMP monitoring location (US-101 Hollywood Freeway north of Vignes Street). However, the Project with Additional Residential Development Option would cause no significant freeway traffic impacts. No driveway intersection approach under either Project Option would exceed LOS D. Therefore, the Project would not cause any significant traffic impacts at proposed driveway locations.

Civic Park Activities. During times in which events in Civic Park would start earlier in the evening, or would be associated with concerts/programs at the Music Center and the Walt Disney Concert Hall, Civic Park traffic may worsen traffic conditions in the P.M. peak hour. The number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. Annual events, festivals, and holiday events could also potentially have temporary and short-term (one-time) traffic impacts. Therefore, on occasion, the size of the event and other factors may cause Civic Park traffic impacts to be significant.

Parking. Under both the Project with County Office Building Option and the Project with Additional Residential Development Option, commercial and residential parking would be consistent with the parking requirements of the LAMC. However, neither Option would meet the requirements of the Deputy Advisory Agency Residential Policy (DAARP), which requires 2.5 parking spaces per dwelling unit. The reasons for seeking a deviation from this policy are provided in Section IV.D, Traffic, Circulation and Parking, of this Draft EIR. If approved, there would be no significant impact for this issue. However, using a worst-case perspective, a significant and unavoidable impact in regard to this policy is assumed. However, the proposed Project's residential parking supply is concluded to be adequate and parking impacts are not expected. While the proposed residential supply would be less than the Advisory Agency Policy requirements, the Project is seeking an exception from that policy, should the exception be granted, which would occur after certification of the Final EIR by the Lead Agency, but concurrently with action on the entitlements requested from the City, there would be no significant residential parking impacts. However, until the exception is granted, it is conservatively concluded that for the purposes of CEQA there would be a significant impact. Due to the availability and adequacy of off-site parking, the Project would not significantly impact the existing off-site parking supply in the surrounding area.

A minor change in the Project's parking arrangements for this first phase of development has been proposed by the Developer since publication of the Draft EIR. This change would cause up to 227 parking spaces to be provided off-site up to two blocks from the Project site. However, there would be no significant parking impacts associated with this parking strategy. During evenings and weekends, there are sufficient spaces available in the Civic Center/Bunker Hill area as office buildings are closed. During the daytime, the most likely location would be in the Walt Disney Hall Concert Hall garage where sufficient spaces would be available, even with the relocation of existing spaces from Parcel Q and Parcel W-1/W-2 due to the Project. Further, because these spaces would be provided within one or two blocks of Parcel Q, and because they would represent only 4 percent of the total Project parking supply, it is not expected that the distribution patterns of Project traffic would be significantly different from the patterns analyzed in the Final EIR. Accordingly, this minor change in the Project would not cause a significant new environmental impact.

b. Cumulative Impacts

Construction

Hauling. The Project's highest periods of haul truck activity would be in the initial six to eight months of construction for each parcel, when trucks would carry excavated material from the site. During those periods, 130 trucks a day to a peak of 300 trucks a day are estimated. Because some of these trips would occur in the A.M. peak hour, haul truck trip periods could cause short-term, significant cumulative traffic impacts. Hauling required for the construction of some of the 93 related projects would potentially

overlap with the initial six to eight months of construction for each of the Project's development parcels. Therefore, haul truck impacts would be cumulatively significant.

Closure of Civic Mall Ramps. The reconfiguration of the ramps to/from the County Mall parking garage on Grand Avenue would require the ramps to be shut down for a period of time during the reconstruction. The diversion of traffic to alternate garage entrances would only affect streets in the immediate vicinity of the County Garage block, but could potentially create temporary and short-term cumulatively significant traffic impacts. The temporary closure of access to related project sites would not impact the same streets adjacent to the County Garage block. However, other temporary access closures at any of the other sites, particularly the 15 related projects located on Grand Avenue, Olive Street, and Hill Street, would cumulatively contribute to congestion and, as such, would be cumulatively significant.

Temporary Lane Closures. Complete closures of any streets are not expected during construction. However, such lane closures could occur due to unforeseen circumstances, in which case, they would cause temporary cumulatively significant impacts. The construction of any of the related projects has the potential to require temporary lane closures. Therefore, the impact of the Project and related projects, particularly the 15 related projects located on Grand Avenue, Olive Street, and Hill Street, would cumulatively contribute to congestion impacts resulting from temporary lane closures.

Traffic and Circulation

The cumulative traffic impacts associated with the 93 related projects and ambient growth have been considered for the purpose of assessing the Project's traffic impacts. In conjunction with the significant Project impacts after mitigation, cumulative traffic impacts on intersection operations would be significant. With the implementation of mitigation measures, impacts on freeway or CMP locations would be less than significant.

Civic Park. Early evening events in the Civic Park may worsen traffic conditions in the P.M. peak hour. The number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. Annual events, festivals, and holiday events could also potentially have temporary and short-term (one-time) traffic impacts. As such, traffic impacts associated with such short-term activities would be considered cumulatively significant.

Parking. The related projects would comply with Municipal Code requirements, and it is expected that demand for commercial and residential parking would be met for the related projects as it is with the Project. However, since the Project would not comply with the Advisory Agency Policy for residential uses, as may also be the case with one or more of the related projects, non-compliance with the Advisory Agency residential parking policy is considered cumulatively significant.

c. Mitigation Measures

Mitigation Measures are proposed below to reduce the Project's potentially significant traffic impacts.

Construction

Mitigation Measure B-1: The Developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, prior to the start of each construction work phase, a Construction Traffic Control/Management Plan to be approved by the LADOT and implemented by the responsible party. The Plan shall include, but not be limited to, Project scheduling, the location and timing of any temporary lane closures, traffic detours, haul routes, temporary roadway striping, and signage for traffic flow, as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project, if necessary. The Plan should also provide for the coordination of construction areas, and for safe pedestrian movement throughout the Project Area such that adequate and safe pedestrian movement access is maintained to adjacent uses including the Walt Disney Concert Hall, the Music Center, the County Courthouse, and the Metro Red Line station portals (on Parcel W-2 and on the Court of Flags).

Mitigation Measure B-2: After approval of the Construction Traffic Control/Management Plan(s) required under Mitigation Measure B-1 and prior to the start of each construction work phase, the Developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall submit a copy of the Plan(s) to the Authority or other appropriate agency, and/or the City Chief Administrative Officer or designee and the County of Los Angeles Chief Administrative Officer. Following receipt of the Plan(s), the County of Los Angeles Chief Administrative Officer or designee shall distribute that information to all County properties on Grand Avenue, including the Hall of Administration, County Courthouse, the Walt Disney Concert Hall, and the Music Center, for further distribution of information to employees and visitors on construction schedules, alternative travel routes, and lane and sidewalk closure information, as appropriate, and the Authority or other appropriate agency, or the City, shall distribute to the appropriate City departments for the same purposes.

Mitigation Measure B-3: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall enter into one

or more temporary arrangements with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off-street spaces for the construction workers during Project construction, and will require all construction workers to use these designated parking spaces. These temporary arrangements shall be to the satisfaction of the CRA/LA and County's CAO or its designee.

Operation

The analysis of intersection capacity identifies significant impacts at seven intersections in the A.M. peak hour, and at seventeen intersections in the P.M. peak hour. Of the seven significant impacts in the A.M. peak hour, three would be at intersections that would continue to operate at LOS D or better (an acceptable level of service), while four would be at intersections that would operate at LOS E. Of the seventeen significant impacts in the P.M. peak hour, ten would be at intersections that would continue to operate at LOS D or better, four would be at intersections that would operate at LOS E, and three would be at intersections that would operate at LOS F. Review of the impacted intersections, in consultation with LADOT, found that physical improvements are not feasible. The purpose and strategy of the following mitigation measures are described in Section 9 of the Mobility Group Traffic Study, Appendix B of the Draft EIR.

Mitigation Measure B-4: If the Project proceeds with the County office building option, the County, on an on-going basis following initial occupancy, shall fund and implement a Transportation Demand Management (TDM) program for the proposed County office use in Parcel W-1/W-2. The County's Chief Administrative Officer shall ensure the County's review and approval of this TDM program. The TDM program could, for example, include an onsite transportation coordinator, post information on transit, provide logistical support for the formation of carpools and vanpools, and other incentives to use transit and rideshare.

Mitigation Measure B-5: The Developer, with regard to the five development parcels, shall implement ATCS in conjunction with the area-wide ATCS program, if not otherwise implemented, prior to the completion of the first phase of development at the intersections identified by LADOT, although the implementation of this measure will provide mitigation to all three Project phases. Implementation of ATCS shall occur in the northern part of downtown, north of Eighth Street, at the locations identified by LADOT. LADOT has determined that implementation of the ATCS mitigation improvements in the area surrounding the Project would comprise the following: (1) upgrades to Model 2070 traffic signal controllers at 35 intersections; (2) installation of 58 ATSAC/ATCS system vehicle detectors at 9 intersections; and (3) installation of

CCTV cameras to provide video information to the ATSAC Center at eight locations. Subject to a final determination by LADOT of the improvements required for the Project, ATCS shall also include LADOT's Transit Priority System (TPS).

Mitigation Measure B-6: The following menu of mitigation measures has been developed to further reduce the Project's potential traffic and circulation impacts. The term, "menu," refers to the various ways that each of the following measures can be implemented to achieve trip reduction. Selection shall be coordinated with LADOT who shall determine which of these mitigation measures are to be implemented.

- Provide enhanced walking connections along the Project street frontages to transit service (to bus stops and to the Red Line station portals at First Street and Hill Street, and at Hill Street mid-block between First Street and Temple Street). These could comprise pedestrian amenities along the Project's street frontages, including landscaped sidewalks, wider crosswalks where feasible at key intersections, improved lighting for pedestrian safety at nighttime, and pedestrian wayfinding signage, to facilitate walking in the Project area. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of these Project components.

- The Developer, as determined by LADOT and prior to initial building occupancy for each development phase, shall provide enhanced bus stops on the street frontages of the five development parcels. These enhanced bus stops may include bus shelters with passenger amenities such as benches, shaded areas, and transit information, that could be integrated into the overall urban design/landscaping of the Project.

- Provide transit information kiosks at various strategic locations on the Project site. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of those Project components.

- The Developer, with regard to the five development parcels, shall participate to the extent feasible in an on-going basis during Project operations, in a Share-Car program (e.g., Flexcar) that makes cars available to registered members.

It is anticipated that up to three on-street parking spaces, subject to a determination of feasibility by LADOT, could be provided at key locations adjacent to the Project frontage for up to three Share-Cars. The Share-Cars could be available to both Project and non-Project users as long as they were members of the Share-Car program. The Project shall support any Share-Car organization's application to the City, and following any implementation of such application, shall promote the Share-Car concept and encourage its usage with Project residents and tenants.

- Provide improved vehicular directional signage on surface streets approaching and within the Project area to direct vehicles to specific destinations and parking locations, as appropriate, to minimize vehicles circulating in the Project area. Such signage should be approved to the satisfaction of LADOT. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park under the applicable agreements, shall implement these measures prior to the completion of construction for the Civic Park.

**Mitigation Measure B-7:** The Developer, with regard to the five development parcels, shall re-stripe the westbound approach of the Third Street and Hill Street intersection from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. This improvement would require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. The final lane configuration of this intersection shall be to the satisfaction of the City of Los Angeles Department of Transportation. In addition, any street widening and construction activities shall be coordinated with the City of Los Angeles Department of Public Works, Bureau of Engineering.

d. Level of Significance after Mitigation

Construction. A maximum of 300 trucks a day during peak hauling periods, a portion of which would occur during the A.M. peak hour, would potentially create a significant and unavoidable short-term traffic impact. During the reconstruction of the Grand Avenue and Hill Street ramps to the existing Civic Center Mall garage, the diversion of traffic to alternate garage entrances would affect streets in the immediate vicinity of the County Garage block and potentially create a short-term significant and unavoidable traffic impact. Complete closures of any streets are not expected during construction. However, such closures could occur due to unforeseen circumstances, in which case, they would cause temporary significant impacts. It is expected that, at most, one traffic or parking lane adjacent to the curb may need to be closed

at certain locations for periods of up to 4 to 6 months, or up to approximately 18 to 24 months, depending on the stage of construction. Although temporary in nature, such closures would cause significant cumulative traffic impacts during such periods of time.

Traffic and Circulation. With the implementation of the intersection mitigation measures, one intersection in the A.M. peak hour and 12 intersections in the P.M. peak hour would be significantly and unavoidably impacted under the Project with County Office Building Option. In addition, this Option's significant impact on the CMP network would be reduced to a less than a significant level with ATCS mitigation. With the implementation of ATCS mitigation measures, no intersections in the A.M. peak hour and 7 intersections in the P.M. peak hour would be significantly and unavoidably impacted under the Project with Additional Residential Development Option.

Freeway/CMP Impacts. The Project with County Office Building Option's significant impacts on the US-101 Hollywood Freeway between Grand Avenue and Hill Street, and on the US-101 Hollywood Freeway north of Vignes Street (a CMP location) would be reduced to a less than significant level through the implementation of the proposed mitigation measures. Freeway/CMP impacts under the Project with Additional Residential Development Option would also be less than significant.

Civic Mall. Early evening events in the Civic Park, or events associated with concerts/programs at the Music Center and the Walt Disney Concert Hall, may worsen traffic conditions in the Project area during the P.M. peak hour. The number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. Annual events, festivals, and holiday events could also potentially have temporary and short-term (one-time) traffic impacts. Therefore, on occasion, the size of the event and other factors may cause Civic Park traffic impacts to be significant and unavoidable.

Parking. Neither the Project with County Office Building Option nor the Project with Additional Residential Development Option, would comply with the Deputy Advisory Agency Residential Policy (DAARP) policy, which requires 2.5 spaces per dwelling unit. While the proposed Project's residential supply would be less than the Advisory Agency Policy requirements, the proposed Project is seeking an exception from that policy. Should the exception be granted by the City, these significant residential parking impacts would be eliminated. However, until the exception is granted, the non-compliance with the Advisory Agency policy is considered a significant and unavoidable impact.

**3. Aesthetics/Visual Resources**

a. Environmental Impacts

Visual Quality/Construction. Construction activities may be detrimental to the aesthetic value of the Project area. In addition, the potential removal or relocation of mature landscaping in the existing Civic

Center Mall in order to create the Civic Park would contrast and detract from the existing visual character of the park. Mature trees would be preserved or relocated to the extent feasible. Construction activities that would contrast with the aesthetic image of the area would cease at the completion of the construction phases. Due to the short-term nature of these activities, construction impacts on aesthetic resources are concluded to be less than significant.

Visual Quality/Operation. The Grand Avenue streetscape program would improve the aesthetic quality and ambience of Grand Avenue and would create an appealing pedestrian environment. Existing visual and pedestrian access into the Civic Park would be improved and the extension of the Civic Park to Spring Street would enhance the aesthetic context of Los Angeles' City Hall. The Project's towers would contribute to the visual continuity of the tall and varied structures comprising the City's skyline and would be consistent with the aesthetic components that represent downtown's aesthetic image. The Project is anticipated to be consistent with the urban design policies that call for the shaping of a skyline that parallels and accentuates the topography of Bunker Hill, the integration of street-front retail with the streetscape, and the addition of public art into the Grand Avenue right-of-way. As such, the Project's visual quality impacts would be less than significant.

Views. The Project would obstruct views of the Walt Disney Concert Hall and distant vistas to the north, possibly including the San Gabriel Mountains, from the Grand Promenade Tower, a 28-story residential building located immediately south of Parcel M-2. Development on Parcels, W-1/W-2 would substantially block views of City Hall from Olive Street, a public street, under both the Project with County Office Building Option and the Project with Additional Residential Development Option. In addition, development on Parcel Q would block distant vistas to the north, possibly including the San Gabriel Mountains, from the upper stories of the Museum Tower residential building located south of Parcel Q and east of MOCA. Therefore, view impacts on the Grand Promenade Tower, Olive Street, and Museum Tower would be significant. One element of Alternative No. 4 would avoid the significant view impact to the residents' views from the Grand Promenade Tower, namely, reversing the towers such that the tower proposed for the southeast corner of Parcels L/M-2 would be moved to the southwest corner, and the tower proposed for the northwest corner would be moved to the northeast corner.

Light and Glare. The Project would increase ambient light and artificial glare through the implementation street lighting, illuminated signs, architectural lighting, light spillage from the windows of high-rise buildings, special events lighting and security lighting. Since the Project's lighting would be similar to adjacent businesses, (i.e., the nearby residential and office towers), it would not significantly impact the environment, which is currently characterized by high levels of ambient light. Special events lighting in the Civic Park would be primarily shielded from surrounding sensitive uses by the existing buildings that line the north and south sides of the existing Civic Center Mall. The increase in ambient light and artificial glare would not be great enough to interfere with activities at nearby residential, office, and cultural uses. Natural sunlight reflected from building surfaces and windows has the potential to create

glare and, although building glare impacts are not anticipated, recent experience with the Walt Disney Concert Hall demonstrated that glare impacts are not necessarily and entirely understood prior to the construction of a structure.

Shade/Shadow. During certain seasons, the Project's towers have the potential to shade sensitive offsite uses, including the future Central Los Angeles Performing Arts Senior High School (currently under construction), the Bunker Hill Towers open space, and Angelus Plaza, depending on the season and hour of the day. However, shading would not exceed three hours between the hours of 9:00 A.M. and 3:00 P.M. during the winter solstice or spring equinox, or four hours between the hours of 8:00 A.M. and 5:00 P.M. during the summer solstice or fall equinox and, as such, the Project would have a less than significant shade/shadow impact.

b. Cumulative Impacts

Aesthetics and Visual Quality. Related projects Nos. 9, 27, 88, and 92 are located in close proximity to the Project site and, as such, have the potential to cumulatively contribute to the visual quality of the area. It is anticipated, that all of the related projects would be constructed with high-quality materials and architectural design and would be consistent in scale with the surrounding buildings. In addition, it is anticipated that the related projects would contribute to sidewalk and streetscape improvements and, therefore, would improve the visual quality of the downtown area. Therefore, cumulative impacts relative to the aesthetics and visual quality would be less than significant.

Views. Related project No. 88 would be located east of the Angelus Plaza senior housing complex and would block some easterly views of City Hall, from the existing Angelus Plaza residential towers. The blockage of views of City Hall would be considered cumulatively significant, since the development on Parcels W-1 and W-2 would also block views of City Hall from Olive Street. The Colburn School's 13-story addition, which is currently under construction, would obstruct north-facing views of the horizon and, possibly, the San Gabriel Mountains from all but the upper stories of the Museum Tower residential high-rise. Development on Parcel Q would further block views that would continue to be available above the Colburn School's 13-story addition. Although north-facing views from Museum Tower would also be obstructed by development on Parcel Q, development on Parcel Q would have a variety of building heights and view corridors so that some views toward the north would have been available, if not for the Colburn School addition. Therefore, the Colburn School addition, combined with the Project, would have a significant cumulative view impact on the Museum Tower residential use.

Light and Glare. The Project and 93 related projects would increase ambient light in downtown Los Angeles. Within the context of the downtown environment, illuminated signage associated with street front retail uses and restaurants would not substantially alter the character of the surrounding area. Related Projects Nos. 27 and 92, which are located in the same line-of-sight as the Project, as viewed

from adjacent westbound and northbound streets, respectively, have the potential to contribute to glare impacts. With the implementation of the recommended mitigation measures, which require a technical glare analysis and review of the Project's building materials, the Project's potentially significant glare impact would be reduced to a less than significant level. Therefore, since the Project would not contribute to the potential glare impacts of the surrounding related projects, cumulative impacts would be less than significant.

Shade/Shadow. The combined morning shading from Parcels W-1/W-2 and Related Project Nos. 9 and 27, with shading later in the day from Related Project No. 88, would create a potentially significant shade/shadow impact on the Angelus Plaza site, during the summer solstice only. Although Related Project No. 92 would generate considerable shading of the Angelus Plaza site, substantially shading from Related Project No. 92 is not anticipated during the summer solstice. No other related projects would contribute to cumulative shading impacts.

c. Mitigation Measures

Mitigation Measures are proposed below to reduce the Project's potentially significant aesthetic and visual resources impacts. In addition to these measures, the Project would comply with regulatory measures and provide project design features which further reduce the Project's less than significant impacts. These measures are listed separately below.

Construction

Mitigation Measures

Mitigation Measure C-1: During Project construction, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials remain posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to construction of the Civic Park.

Regulatory Measure

Regulatory Measure C-1: Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Streetscape Program under the applicable agreements, shall prepare and implement a tree replacement plan should mature trees along Grand Avenue be impacted by Project construction. Existing mature trees shall be replaced at a ratio of not less than 1:1, to the extent consistent with the final streetscape design. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

Project Design Features

Project Design Feature C-1: Prior to the start of construction along the east side of Grand Avenue, between First and Temple Streets, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall coordinate construction of park improvements in the westerly Civic Park sector with any installation of streetscape and other improvements on Grand Avenue between First and Temple Streets to reduce the duration and visual impact of construction activities. Scheduling of construction activities for the Civic Park and the Streetscape Program shall be reviewed and approved by the Authority and shall be implemented by the responsible parties.

Project Design Feature C-2: Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall schedule and coordinate sidewalk construction with the development of the adjacent parcels to reduce the duration and visual impact of construction activities. Scheduling of construction activities for the five development parcels, the Civic Park and the Streetscape Program shall be reviewed and approved by the Authority and implemented by the responsible parties.

Operation

Mitigation Measures

Mitigation Measure C-2: Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, shall submit a design plan and technical analysis, prepared by the Project's architect, as part of the building permit submission, that demonstrates that the final selection of building materials for the five development

parcels shall not create a significant glare impact on any offsite sensitive uses, including line-of-sight glare on any street or commercial, residential, or cultural use. The approved design plan shall be implemented by the Developer with regard to the five development parcels. The design plan and technical study shall be reviewed and approved by the Authority.

Mitigation Measure C-3: Prior to each construction phase, the Developer with regard to the five development parcels, shall prepare and, thereafter, implement plans and specifications to ensure that architectural lighting is directed onto the building surfaces and has low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

Regulatory Measure

Regulatory Measure C-3: Prior to the completion of final plans and specifications, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare lighting plans and specifications for the design type of light fixtures, height of light standards, and orientation of light fixtures and standards within the public right-of-way to ensure that all light fixtures do not interfere with the activities occurring within these areas. Lighting plans with regard to the Streetscape Program shall be submitted to the City's Department of Building and Safety or other appropriate City agency or department, for review and approval. Lighting plans with regard to the Civic Park shall be submitted to the County of Los Angeles CAO or its designee for review and approval. Approved lighting plans shall be implemented by the responsible parties.

Regulatory Measure C-4: Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall submit to the Authority for review and approval, building plans and specifications that demonstrate that all ventilation, heating and air conditioning ducts, tubes, and other such mechanical equipment shall be screened from the line-of-sight from the street. Approved building plans and specifications shall be implemented by the responsible parties.

Regulatory Measure C-5: Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall submit design plans that demonstrate that all utility lines and connections are constructed underground. Approved utility plans and connections with regard to the five

development parcels shall be reviewed and approved by the Authority, whereas the City's Department of Building and Safety or other appropriate City agency or department, shall review and approve with regard to the Streetscape program. Approved utility lines and connections shall be implemented by the responsible parties.

Regulatory Measure C-6: Prior to construction, the Developer, with regard to the five development parcels, shall submit design plans for trash collection areas to the Authority for review and approval. Trash collection areas shall be screened from line of sight from the street. Approved design plans shall be implemented by the Developer.

Project Design Feature

Project Design Feature C-3: Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare architectural plans that shall be reviewed and approved by the Authority such that all ground-level building fixtures, including, but not limited to, security gates, landscape light fixtures, pedestrian lights, air intake shafts, and other appurtenances are integrated into the architectural theme and/or design of the respective Project components. Approved architectural plans shall be implemented by the Developer and the responsible parties.

d. Level of Significance after Mitigation

Visual Quality. Visual quality impacts generated by construction activities would be reduced to a less than significant level through the implementation of Mitigation Measures C-1 through C-3.

Views. The Project would obstruct views of the Walt Disney Concert Hall and distant vistas to the north, possibly including the San Gabriel Mountains, from the Grand Promenade Tower, a 28-story residential building located immediately south of Parcel M-2. Development on Parcels W-1/W-2 would substantially block views of City Hall from Olive Street, a public street, under both the Project with County Office Building Option and the Project with Additional Residential Development Option. In addition, development on Parcel Q would block distant vistas to the north, possibly including the San Gabriel Mountains, from the upper stories of the Museum Tower residential building. Therefore, view impacts on the Grand Promenade Tower, Olive Street, and Museum Tower would be significant and unavoidable. Cumulative view impacts would also occur due to the location of Related Project No. 88 in relation to Angelus Plaza.

Light and Glare. The Project would generate potential glare associated with special events lighting in the Civic Park and reflected sunlight from building surfaces. With the implementation of Mitigation

Measures C-8 through C-10, potential light and glare impacts associated with special events lighting and reflected sunlight would be reduced to less than significant levels.

Shade/Shadow. The Project would not shade any offsite sensitive uses in excess of significance thresholds and, therefore, would not cause any significant and unavoidable shade/shadow impacts. However, a potentially significant cumulative shade-shadow impact would occur with combined shading of the Angelus Plaza residential complex by Related Projects Nos. 9, 27, and 88 during the morning hours on the summer solstice.

**4. Historical Resources**

a. Environmental Impacts

Under the proposed Project, the proposed Civic Park would be revitalized and activated through a new design that would be functional and accessible to the public. In addition, the Grand Avenue Streetscape Program would redefine Grand Avenue as a great Los Angeles street that would facilitate and improve pedestrian movement and create a positive environment for sidewalk cafes, special events, and building entrances. Sidewalks would be widened wherever feasible and planting beds would be maximized in order to promote the growth of healthy and mature street trees.

Within the Project area, several culturally and historical significant buildings including the Walt Disney Concert Hall, the Music Center, the Stanley Mosk County Courthouse, the Cathedral of Our Lady of the Angels, and the Kenneth Hahn Hall of Administration are present. The grouping of buildings, structures, objects, and sites that comprise the Civic Center also appears eligible for California Register designation as a potential historic district. Although the Civic Center Park and the Streetscape Program should be developed in substantial compliance with the current Conceptual Plans for these Project components, less than significant impacts with regard to the historic context of the adjacent resources would occur. However, potentially significant impacts could result if the final design for the streetscape program or the Civic Park directly or indirectly disrupted those character-defining features that give the adjacent buildings and resources their historical and architectural significance. Therefore, mitigation measures are recommended to ensure that the Project would not significantly impact the potential or existing eligibility of adjacent historical resources.

The Civic Center Mall (dedicated as El Paseo de los Pobladores de Los Angeles) is eligible for individual listing in the California Register because it physically displays exceptional mid-century Modern precepts in its design, style, materials, workmanship, circulation systems, hardscape and softscape features, and spatial relationships adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. It is also considered a contributing property to a potentially eligible California Register Historic District comprised of civic-owned and functioning properties within the Civic Center area. Implementation of the Civic Park may result in the removal of many of the Civic Center Mall's character-

defining features. For a substantial adverse change to occur, the majority of the park's character-defining features would need to be removed or substantially altered physically. Significant impacts would result if the following occurs to any of the following four character-defining features: (1) the water feature (both the fountain and pools) no longer serve as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. Additionally, the Secretary of the Interior's Standards for the Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the Standards) should be utilized to ensure that rehabilitation work to the park does not impair those qualities and historic characteristics of these four key character-defining features that convey the park's historical significance and qualify it for potential California Register listing as an individual resource and as a contributing property to the potential Los Angeles Civic Center Historic District. If the character-defining features noted above were retained and reused in a manner consistent with the Standards and as stipulated in this analysis, then potential impacts to this resource would not occur and mitigation measures would not be required.

Along with the removal of the parking lot ramps off Grand Avenue and Hill Street, the following character-defining features may be removed since their removal would not diminish the integrity of the resource in terms of its eligibility as an individual resource: (1) the mature landscaping (since the new park design would also include notable and compatible landscaped areas), (2) the existing walkways (since the new park would also include walkways to facilitate movement through the park), and (3) the granite stairs off Grand Avenue.

b. Cumulative Impacts

The development of one or more related projects in the downtown area has the potential to affect listed or eligible resources. Each of the related projects having the potential to impact historical resources would be subject to CEQA review and it is anticipated that any potential impacts on historical resources would be addressed and reduced to less than significant levels through the CEQA process. However, as the Project may result in a potentially significant impact with regard to the Civic Center Mall on an individual basis as well as a contributor to the potential Civic Center historic district, the Project and the related projects have the potential to cause a significant cumulative impact on historical resources.

c. Mitigation Measures

The following mitigation measures are required to ensure that many of those potential adverse impacts identified with regard to historic resources would be reduced to a level of less than significant. Mitigation measures are also required for resources proposed for demolition since they would not eliminate the significant impact associated with the loss of a historic resource.

Mitigation Measures

Mitigation Measure D-1: Potential Los Angeles Civic Center Historic District. Prior to the start of each construction phase, the responsible parties for implementation of the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the potential Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following measures:

Grand Avenue Streetscape Program Design Features. If the Streetscape Program is implemented in substantial conformance to that set forth in the Project's Conceptual Plan, then the following mitigation measure is not required since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then the landscape and hardscape features proposed as part of the Grand Avenue Streetscape Program shall respect the linear qualities of the street and sidewalks in respect to the adjacent historic resource. Such landscape treatments shall be unified and planted in a manner as to not obscure the sight lines to the facades of those properties identified as contributors to the potential Los Angeles Civic Center Historic District from the public right-of-ways. The design of the Project's streetscape improvements shall consider their height, width, and spatial placement and include a program of selective pruning of trees to retain sight lines on a regular basis.

Mitigation Measure D-2: Music Center. No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the

Project's Conceptual Plan, then prior to the start of each construction phase, the entity responsible for implementing the Project's streetscape program under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potential eligibility of the Music Center are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the streetscape improvements does not materially alter the Music Center's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-3: Cathedral of Our Lady of the Angels. No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then prior to the start of each construction phase, the entity responsible for implementing the Project's streetscape program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Cathedral of Our Lady of the Angels are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the streetscape improvements does not materially alter the Cathedral of Our Lady of the Angels' potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-4: Kenneth Hahn Hall of Administration. No mitigation measures are required if the final design for the Civic Park and the Grand Avenue streetscape improvements are in substantial conformance to that set forth in the Project's Conceptual

Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park and the streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Kenneth Hahn Hall of Administration as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park and the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final designs for the Civic Park and streetscape improvements do not materially alter the Kenneth Hahn Hall of Administration's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards. The County's CAO or its designee shall determine compliance for the Civic Park, and the City's Department of Building and Safety shall determine compliance for the Streetscape Program.

Mitigation Measure D-5: Civic Center Mall (El Paseo de los Pobladores de Los Angeles). Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Civic Center Mall for listing in the California Register are reduced to the maximum extent practicable. However, in the event that any one or more of the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes, then the Standards shall be utilized to ensure that rehabilitation work to the four character-defining features of the park referenced in this Mitigation Measure D-

5 does not impair the historic characteristics that convey the Civic Center Mall's historical significance as an individual resource and as a contributing property to the potentially eligible Los Angeles Civic Center Historic District. If such compliance with such Standards cannot be achieved, then the following measures shall apply to the applicable character-defining features identified in this Measure:

Recordation. Prior to the issuance of a demolition permit for the Civic Center Mall and its associated features, a Historic American Building Survey (HABS) Level II-like recordation document shall be prepared for the Civic Center Mall. A qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History shall prepare this document. The HABS-like document shall record the existing landscape and hardscape features of the Civic Center Mall, including the four character-defining features identified in this measure. The report shall also document the history and architectural significance of the property and its contextual relationship with the surrounding civic buildings and environment. Its physical composition and condition, both historic and current, should also be noted in the document through the use of site plans, historic maps and photographs, and large-format photographs, newspaper articles, and written text. A sufficient number of large-format photographs shall be taken of the resource to visually capture its historical and architectural significance through general views and detail shots. Field photographs (35mm or digital format) may also be included in the recordation package. All document components and photographs should be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Archival copies of the report, including the original photographs, shall be submitted to the California Office of Historic Preservation and the Huntington Library. Non-archival copies of the report and photographs shall be submitted to the County of Los Angeles, the City of Los Angeles Planning Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy Modern Committee.

Salvage and Reuse of Key Park Features. Prior to the removal of the four character-defining features identified in this Measure, a qualified preservation consultant and landscape architect shall make an inventory of significant landscape and hardscape elements. . Where feasible, these materials and elements shall be itemized, mapped, photographed, salvaged, and incorporated into the new design of the park, wherever possible. To the extent salvageable materials cannot be reused on-site, they shall be disposed of in accordance with applicable county surplus procedures.

Mitigation Measure D-6: Hall of Records. No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Hall of Records building as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Hall of Records' potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-7: Court of Flags. No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potential eligibility of the Court of Flags as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially

alter the Court of Flag's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-8: Clara Shortridge Foltz Criminal Justice Center. No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Clara Shortridge Foltz Criminal Justice Center as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park does not materially alter the Clara Shortridge Foltz Criminal Justice Center's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-9: Los Angeles City Hall. No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to those historic characteristics that make the Los Angeles City Hall building historically significant as a designated resource and as a contributing property to the potentially eligible Los Angeles Civic Center Historic District, are reduced to the

maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the historic significance of the Los Angeles City Hall. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-10: Los Angeles County Law Library. No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the potentially eligible Los Angeles County Law Library as a contributing property to the Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Los Angeles County Law Library's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

Mitigation Measure D-11: Los Angeles County Courthouse. No mitigation measures are required if the final design for the Civic Park and the Grand Avenue streetscape improvements are in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park and the streetscape improvements

not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Los Angeles County Courthouse as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park and the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed final designs for the Civic Park and streetscape improvements do not materially alter the Los Angeles County Courthouse's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards. The County's CAO or its designee shall determine compliance for the Civic Park, and the City's Department of Building and Safety shall determine compliance for the Streetscape Program.

Mitigation Measure D-12: Southern California Edison (One Bunker Hill). No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements are not implemented in substantial conformance with the Project's Conceptual Plan, the responsible parties for implementation of the Streetscape Program under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the historic characteristics that convey the Southern California Edison Building's (One Bunker Hill) significance are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the proposed streetscape improvements does not materially alter the Southern

California Edison (One Bunker Hill) Buildings' historic significance. This evaluation shall be conducted in accordance with Secretary of the Interior's Standards.

d. Level of Significance after Mitigation

Under CEQA, implementation of the recommended mitigation measures would reduce all of the identified significant impacts to a less than significant level, with the exception of one that is connected directly with the Civic Center Mall. The actual extent of the significant impacts to the park itself is dependent upon the Civic Park's final design. Significant impacts to the park would result if one or more the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. Additionally, the Standards should be utilized to ensure that rehabilitation work to the park does not impair those qualities and historic characteristics of these four key character-defining features. If the character-defining features noted above were retained and reused in a manner consistent with the Standards and as stipulated in this Draft EIR, then potential impacts to this resource would not occur and mitigation measures would not be required.

However, if the current Conceptual Plan is fully implemented in a way that does not comply with the Standards, the recommended mitigation measures are required though they would not reduce the impact to this resource to a less than significant level. Nonetheless, such mitigation measures are important to ensure that important information regarding this resource's contribution to the history of the City of Los Angeles, County of Los Angeles, and the southern California region are retained.

**5. Population and Housing**

a. Environmental Impacts

The Project with County Office Building Option is forecasted to generate 2,925 residents and 3,930 employees, while the Project with Additional Residential Development Option is forecasted to generate a residential population of 3,777 and 1,206 employees. These changes represent from 0.5 percent to 2.3 percent of SCAG-projected residential and employment growth for the City of Los Angeles Subregion. Under both Options, the Project's contribution to growth would be a small percentage of projected growth and would not exceed adopted SCAG forecasts. The Project would also generate several thousand short-term construction employment opportunities. The increase in population growth within the Central City Community Plan area that is attributable to the Project would be greater than projected. However,

because this growth would support policies to reduce the jobs/housing ratio in the downtown area, population and housing impacts are concluded to be less than significant.

b. Cumulative Impacts

Additional growth from the 93 related projects would generate 28,952 estimated residents and 61,158 estimated employees. When combined with the Project with County Office Building Option, the estimated population growth would be 31,877 residents and 65,364 employees. Under the Project with Additional Residential Development Option, cumulative population growth would be 32,729 residents and 62,364 employees. According to SCAG forecasts for the City of Los Angeles Subregion, cumulative growth under both Project Options would represent approximately 18 percent of the forecasted residential growth and 29 percent of the forecasted employment growth. This level of cumulative growth would not exceed projections and would therefore be less than significant. The related projects are also anticipated to be consistent with SCAG and Los Angeles policies for development of the downtown area as a dense activity center and, as such, would be less than significant.

c. Mitigation Measures

The Project would result in no significant impacts on population, housing and employment, and no mitigation measures are required.

d. Level of Significance After Mitigation

Project development would not exceed SCAG's adopted projections for the City of Los Angeles Subregion. The Project would also be consistent with adopted policies, including jobs/housing balance, as set forth in the Central City Community Plan, the City's General Plan Housing Element, the General Plan Framework, and SCAG's Regional Comprehensive Plan and Guide. Therefore, the Project would result in less than significant environmental impacts to housing or population.

**6. Air Quality**

a. Environmental Impacts

The air quality analysis presented in the Draft EIR used conservative assumptions, followed all SCAQMD protocols, and did not discriminate against or exclude any particular group of sensitive receptors from that air quality impact analysis that should have been included. For instance, the Draft EIR does not discern between the senior residents of Angelus Plaza or younger student occupants of the Colburn School. Neither does the Draft EIR distinguish between these receptors and residents who may be living outdoors in the vicinity of Main Street. The conclusions of significance in the Draft EIR with

regard to air quality impacts would apply equally to all residential and other sensitive receptor locations in the Project area.

Construction of the proposed Project would generate fugitive dust and combustion emissions from the use of heavy-duty construction equipment on-site and from construction worker trips as well as from delivery and haul truck travel to and from the Project site. Construction related daily regional emissions from both direct and indirect sources are forecasted to exceed the significance thresholds for carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOC) and particulate matter less than 10 microns in diameter (PM10). Thus, emissions of these pollutants would result in a significant regional air quality impact during the Project's construction phase. An analysis of local air quality impacts from construction operations has also been conducted. This analysis indicates that the proposed Project would not result in an exceedance of the SCAQMD recommended localized significance thresholds (LST) for CO. However, localized NOx and PM10 emissions would exceed their applicable LST screening thresholds and, thus, localized PM10 and NO2 impacts during short-term construction activities at areas in close proximity to the Project's construction sites would be significant. Construction of the proposed Project would result in a less than significant cancer risk from diesel particulate emissions and no construction activities are proposed which would create objectionable odors.

Air pollutant emissions associated with occupancy and operation of the proposed Project would be generated by the consumption of electricity and natural gas, by the operation of on-road vehicles and by miscellaneous area sources (among other things, landscaping equipment, consumer/commercial solvent usage, and architectural coatings,). The Project would exceed SCAQMD regional significance thresholds for CO, NOx, PM10, and VOC. Project traffic would not cause an exceedance of the California 1-hour or 8-hour CO standards of 20 ppm or 9.0 ppm, respectively, and no significant impacts to local CO concentrations would occur. Potential sources of air toxic emissions associated with the Project would be limited to sources typical within the urban environment and would contribute small amounts of toxic air pollutants to the Project vicinity, and as a result, would be well below any levels that would result in a significant impact on human health. In addition, proposed residential uses would not be located near any air toxic sources within the recommended siting distances established by the California Air Resources Board (i.e., the Project would not site residential uses in a high cancer risk area due to ambient air quality). Development of the proposed Project would also be compatible with the air quality policies set forth in the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan, the Southern California Association of Governments' Regional Comprehensive Plan and Guide and the City of Los Angeles General Plan. The Project would also not include any odor-causing uses identified by the SCAQMD and, therefore, potential odor impacts would be less than significant.

The potential exists that the later stages of Project construction could occur concurrently with the occupancy of the earlier stages of development. Similar to construction and operation of the proposed

Project, concurrent emissions would exceed CO, NOx, PM10, and VOC threshold levels. Thus, a significant regional air quality impact would occur.

The Additional Residential Development Option would result in a substantially similar construction program as the proposed Project and, therefore, the temporary construction impacts under both development scenarios would be significant. Vehicle trip lengths and area source emissions would be different under the Additional Residential Development Option. With the exception of VOC, pollutant emissions would decrease. While VOC emissions do increase slightly, ozone precursors (i.e., VOC and NOx) emissions would be slightly less than the Project. Regardless, the Additional Residential Development Option would result in similar long-term significant air quality impacts.

b. Cumulative Impacts

Buildout of the identified related projects that would occur within a similar time frame as the Project would increase short-term emissions for concurrent activities during any day of the Project's construction period. Since emissions of criteria pollutants under peak construction activities are concluded to be significant, any additional construction activities as part of any related project occurring during this time and in the vicinity of the Project site would be adding additional air pollutant emissions to these significant levels. As a result, a significant and unavoidable cumulative impact with respect to construction emissions would occur. Implementation of the Project would also result in an increase in ongoing operational emissions which would contribute to region-wide emissions on a cumulative basis and as such, the Project's cumulative air quality impacts are also concluded to be significant. In such cases, the SCAQMD recommends that all projects, to the extent possible, employ feasible mitigation measures which has been done with regard to the proposed Project.

c. Mitigation Measures

Mitigation Measures are proposed below to reduce the Project's potentially significant air quality impacts. In addition to these measures, the Project would comply with regulatory measures and provide project design features which further reduce the Project's less than significant impacts. These measures are listed separately below.

Construction

Mitigation Measures

Mitigation Measure F-1: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. The City's

Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with SCAQMD Rule 403 during construction with regard to construction associated with the five development parcels and the Grand Avenue Streetscape Program.. The County's CAO or its designee shall determine compliance with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance. Compliance with the applicable provisions of Rule 403 shall include, but not be limited to, using best available control measures listed in Table 1 of Rule 403 to minimize fugitive dust emissions from each fugitive dust source type within active operations, and will include at least the following specific best management practices (BMPs):

- Water soils daily and not more than 15 minutes prior to earth moving activities;
- Water surfaces two times per day or more in order to maintain a surface crust to prevent soil erosion;
- Apply soil conditioners or vegetative cover to areas that will be exposed for an extended duration;
- Apply chemical stabilizers within five working days of ceasing grading;
- Install approved trackout prevention devices and provide street sweeping within the Project area;
- Securely cover truck loads with a tarp;
- Cease grading activities when wind speeds exceed 25 miles per hour;
- Permanently seal exposed surfaces as soon as possible after grading is finished; and
- Provide temporary wind fencing, consisting of wrapped chain link or solid fencing, around the sites that are being graded/excavated to reduce dirt/dust from being blown over to adjoining properties.

Mitigation Measure F-2: During each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to

construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

Mitigation Measure F-3: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall comply with SCAQMD Rule 402 to reduce potential nuisance impacts due to odors from construction activities. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

Mitigation Measure F-4: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all haul truck tires shall be cleaned at the time these vehicles exit the Project site. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

Mitigation Measure F-5: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all export material carried by haul trucks shall be covered by a tarp or other means. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

Mitigation Measure F-6: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-7: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that construction equipment is maintained and operated so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn off their engines, when not in use, to reduce vehicle emissions. Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction activities associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-8: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that electricity rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-9: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to

construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-10: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that heavy-duty construction equipment shall use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-11: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties with regard implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that shuttle service shall be provided to construction workers who are required to park in offsite parking lots, if such lots are not within a walking distance of 1,100 feet from the respective construction sites. The CRA/LA shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-12: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall equip major earth moving equipment, haul trucks, and excavation equipment with particulate filters and catalytic converters. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Operation

Transportation System Management and Demand Management

Mitigation Measure F-13: During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park

under the applicable agreements shall, to the extent feasible, ensure that deliveries are scheduled during off-peak traffic periods to encourage the reduction of trips during the most congested periods. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure, with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure F-14: During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall coordinate with the MTA and the City of Los Angeles Department of Transportation to provide information to Project employees, residents and guests with regard to local bus and rail services.

Mitigation Measure F-15: Provide the appropriate number of bicycle racks located at convenient locations in the Project site. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park, under the applicable agreements, shall implement these measures prior to the completion of each construction phase. The City's Department of Building and Safety shall review and approve the number and location of the bicycle racks with regard to the five development parcels. The County's CAO or its designee shall perform the same function with regard to the Civic Park.

Mitigation Measure F-16: During on-going Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall ensure that all fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed, but a minimum level of lighting should be provided for safety. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this mitigation measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Project Design Features

Project Design Feature F-1: During site plan review for each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall give consideration to the provision of safe and convenient access to bus stops and public

transportation facilities. Pedestrian access plans to bus stops and transit facilities shall be submitted to the Authority, for review and approval. Approved access plans shall be implemented by the responsible parties.

Project Design Feature F-2: The Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall provide convenient pedestrian access throughout the Project site. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of these Project components. Pedestrian access plans shall be submitted to the Authority, for review and approval. Approved pedestrian access plans shall be implemented by the responsible parties.

Service and Support Facilities (point sources)

Regulatory Measure

Regulatory Measure F-1: During Project operations, The Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall ensure that all point source facilities shall obtain all required permits from the SCAQMD. The issuance of these permits by the SCAQMD shall require the operators of these facilities to implement Best Available Control Technology and other required measures that reduce emissions of criteria air pollutants. Proof of permit issuance by the SCAQMD shall be provided to the City's Department of Building and Safety, or other appropriate City agency or department, with regard to the five development parcels, and the County's CAO or its designee with regard to the Civic Park. Compliance with point source permits shall be enforced by the SCAQMD for all Project components.

Project Design Features

Project Design Feature F-3: During Project operations, the Developer, with regard to the five development parcels, shall ensure that commercial businesses located within the Project site shall be limited to those that do not emit high levels of potentially toxic air contaminants or odors (e.g., dry cleaners with on-site processing plants that handle toxic chemicals). The City's Department of Building and Safety, or other appropriate City agency or department, shall be responsible for the enforcement of this measure with regard to the five development parcels.

Natural Gas Consumption and Electricity Production

Regulatory Measure

Regulatory Measure F-2: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall prepare and implement building plans and specifications that ensure that all residential and non-residential buildings shall, at a minimum, meet the California Title 24 Energy Efficiency standards for water heating, space heating and cooling. Approved building plans shall be implemented by the Developer and the responsible parties. Building plans and specifications with regard to the five development parcels shall be reviewed and approved by the City's Department of Building and Safety, or other appropriate City agency or department. Building plans and specifications with regard to the Civic Park shall be reviewed and approved by the County's CAO or its designee.

Building Materials, Architectural Coatings and Cleaning Solvents

Regulatory Measure

Regulatory Measure F-3: During each construction phase, the Developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall ensure that building materials, architectural coatings and cleaning solvents shall comply with all applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park. The SCAQMD retains enforcement of this measure for all Project components in the case of noncompliance.

d. Level of Significance after Mitigation

With implementation of the above regulatory measures and mitigation measures, heavy-duty construction equipment emissions would be reduced by a minimum of 5 percent and fugitive dust emissions would be reduced by an additional 16 percent. However, regional construction activities would still exceed the SCAQMD daily emission thresholds for regional NOx, CO and VOC after implementation of all feasible mitigation measures. Therefore, construction of the Project would have a significant and unavoidable impact on regional air quality. Construction activities would also still exceed the SCAQMD daily

localized emission threshold for PM10 and NO2 after implementation of all feasible mitigation measures. Therefore, construction of the Project would also have a significant and unavoidable impact.

Regional operational emissions would still exceed the SCAQMD daily emission threshold for regional CO, VOC, PM10, and NOx after implementation of all feasible mitigation measures. Therefore, operation of the Project would have a significant and unavoidable impact on regional air quality. In addition, regional concurrent construction and operational emissions would still exceed SCAQMD daily thresholds for CO, VOC, PM10, and NOx after implementation of all feasible mitigation measures. Therefore, concurrent construction and operation of the Project would have a significant and unavoidable impact on regional air quality.

**7. Noise**

a. Environmental Impacts

As with most construction projects, construction would require the use of heavy equipment such as bulldozers, backhoes, cranes, loaders, and concrete mixers. Construction equipment would produce maximum noise levels of 74 dBA to 101 dBA at a distance of 50 feet from the noise source. Nearby sensitive land uses (e.g., the Walt Disney Concert Hall located across Grand Avenue from Parcel Q, the Colburn School and, also, the Music Center) would occasionally experience construction noise levels of 82 dBA (hourly Leq) during the heaviest periods of construction. While the overall construction duration is expected to be nine years, the higher noise-producing activities are expected to occur for one to two months during demolition, between four and five months during excavation, and for durations during building construction. In addition, these noise levels would only occur when construction activities are along or near the Project site perimeter. Nevertheless, construction of the proposed Project would result in a significant impact to off-site sensitive receptors without the incorporation of mitigation measures.

Construction can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. Within the Project site, the highest vibration from typical construction equipment would be generated during pile driving operations. However, sensitive land uses would be located at a sufficient distance from any potential pile driving activity so that vibration from such activities would be less than significant.

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the Project site throughout the Project's construction period. While construction workers would arrive from many parts of the region, and thus different directions, haul trucks and delivery trucks would generally travel to the Project site on Third Street and the Harbor Freeway (I-110). This route would avoid as many noise-sensitive uses as feasible that are present within the Project vicinity. In addition, construction traffic would not occur during the noise-sensitive late evening and nighttime hours, as well as on Sundays and holidays.

The Project's operational noise analysis addresses potential noise impacts to nearby noise-sensitive receptor locations, as well as the proposed on-site residential uses within the Project site, attributable to the long-term operations of the proposed Project. Specific noise sources addressed in the analysis include roadway noise, mechanical equipment, loading dock and refuse collection /recycling areas, miscellaneous rooftop equipment, trash pick-up areas, outdoor gathering areas, parking facilities, rooftop helipads, and Civic Park activities.

The largest Project-related traffic noise impact is anticipated to occur along the segment of Second Street, between Grand Avenue and Olive Street (1.3 dBA increase in Community Noise Equivalency Levels). This impact would be less than the 3 dBA significance threshold and roadway noise impacts would be less than significant. Noise levels associated with on-site sources (e.g., loading docks, parking facilities, and mechanical equipment) would include noise control measures and project features to meet City of Los Angeles Municipal Code noise standards. Therefore, impacts are anticipated to be less than significant and no mitigation measures are required.

The Civic Park would be designed with the intent that specified areas would accommodate particular programmed uses, but would also work in unison for larger events. Typical park uses would not be considered a substantial noise source as no organized athletic activities are proposed and typical activities would consist of picnics, exercise, and enjoyment of the outdoors. However, outdoor shows and events have the potential to generate significant noise levels during staged special events and operations within the other venues that may be located within the Civic Park. The future Leq for outdoor events would be approximately 63 to 75 dBA at the uses surrounding the Civic Park. As these surrounding uses include the Los Angeles County Courthouse, Clara Shortridge Foltz Criminal Justice Center, and law library, outdoor event noise levels could intermittently interfere with these uses. The noise level at the closest apartments (Grand Promenade Tower Apartments) would be approximately 50 dBA and would be less than significant. Although, because of the characteristics of amplified speech and crowd cheering, the noise generated during these events may be occasionally discernible at the nearby sensitive receptors, it would be temporary in nature and a less than significant impact.

With respect to vibration, Project operations would not result in any additional long-term ground-borne vibration sources and impacts would be less than significant.

Construction of the Additional Residential Development Option would be substantially similar to that of the proposed Project and, like the proposed Project, would result in a less than significant vibration impact and would generate temporary noise from construction that would result in a significant impact. The traffic attributable to the Project with Additional Residential Development Option was conservatively assumed to be the same as that generated by the Project with County Office Building Option. Thus, traffic related noise impacts would remain unchanged and considered less than significant, and no mitigation measures are required. In addition, stationary source noise levels would also be substantially

the same as many of the potential sources of noise (e.g., loading docks, mechanical equipment, etc.) would be present regardless of whether additional residences or office space is constructed.

b. Cumulative Impacts

Noise impacts during construction of the proposed Project and each related project (that has not already been built) would be short-term and limited to the duration of construction and would be localized. In addition, it is anticipated that each of the related projects would have to comply with the applicable provisions of the City's noise ordinance, as well as mitigation measures that may be prescribed by the City that require significant impacts to be reduced to the extent feasible. However, since noise impacts due to construction of the proposed Project would be significant on its own, noise impacts due to construction of the proposed Project in combination with any of the related projects would also be significant without mitigation.

Cumulative traffic volumes would result in a maximum increase of 2.5 dBA CNEL along Second Street, between Grand Avenue and Olive Street. As this noise level increase would be below the 3 dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant. LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, would maintain noise to less than significant levels at the property lines of the related projects. Therefore, on-site noise produced by any related project would not be additive to Project-related noise levels. As the Project's composite stationary-source noise impacts would be less than significant, cumulative stationary-source noise impacts attributable to cumulative development would also be less than significant.

c. Mitigation Measures

Mitigation Measures are proposed below to reduce the Project's potentially significant noise impacts.

Construction

Mitigation Measures

Mitigation Measure G 1: To reduce any impact on nearby venues that may be noise sensitive receptors, such as the Music Center, Walt Disney Concert Hall, and the County Courthouse, the following Measures G-1 and G-2 shall be implemented as follows: During each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall limit (i) construction activities utilizing heavy equipment to Monday through Friday from 7:00 A.M. to 8:00 P.M., and (ii) interior construction work inside building shells and construction activities not utilizing

heavy equipment to 7:00 A.M. to 9:00 P.M Monday through Friday. Saturday construction shall be limited to 8:00 A.M. to 6:00 P.M. No exterior construction activities shall be permitted on Sundays or holidays per applicable City regulations. Construction noise measures shall also be implemented, which may include the use of noise mufflers on construction equipment used within 100 feet of these buildings. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the City's Department of Building and Safety or other appropriate City agency or department shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-2: During each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of Civic Park and the Streetscape Program shall not use heavy equipment within (to the maximum extent practicable) 100 feet of the County Courthouse building while Court is in session. Construction contracts must specify that all construction equipment shall be in proper operating condition and fitted with standard factory silencing features and other applicable attenuation devices such as mufflers. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-3: During the initial stage of each construction phase (site demolition and site preparation/excavation) for each Project parcel and when construction activities are within 200 feet of noise sensitive land uses, the Developer, with regard to the five development parcels, shall erect a temporary, 8-foot, ½-inch-thick plywood fence along the boundaries of each construction site adjacent to noise sensitive uses such that the "line of sight" between on-site construction activities and the residential or other sensitive uses is blocked, where feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels.

Mitigation Measure G-4: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that pile drivers within the individual activity/development site under construction at that time shall be

equipped with noise control devices having a minimum quieting factor of 10 dBA. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-5: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall, except as otherwise permitted by applicable agreements, ensure that construction loading and staging areas shall be located on the Project site within each respective construction site and away from noise-sensitive uses to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-6: Prior to the issuance of grading permits for each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications that include a requirement to route pedestrians (to the maximum extent practicable) 50 feet away from the construction area when heavy equipment such as hydraulic excavators is in use. Such routing may include the posting of signs at adjacent intersections. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Mitigation Measure G-7: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall designate a construction relations officer to serve as a liaison with surrounding property owners who is responsible for responding to any concerns regarding construction noise. The liaison shall coordinate with the Project construction manager(s) to implement remedial measures in the shortest time feasible. The liaison's telephone number(s) shall be prominently displayed at multiple locations along the perimeter of each construction site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five

development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Operations

To further reduce noise impacts on the Project site, the following mitigation measure is recommended:

Mitigation Measure G-8: The Developer, with regard to the five development parcels, shall prepare and implement building plans that ensure prior to the start of each construction phase, which includes residential development that all exterior walls, floor-ceiling assemblies (unless within a unit), and windows having a line of sight (30 degrees measured from the horizontal plane) of Grand Avenue, Hill Street, Hope Street, First Street, and Second Street of such residential development shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a lab-tested Sound Transmission Class of 30, subject to field testing, as defined in the UBC Standard No. 35 1, 1982 edition. Sign-off by the City's Department of Building and Safety, or other appropriate City agency or department, shall be required prior to obtaining a building permit. The Developer, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City's Department of Building and Safety, or other appropriate City agency or department. Examples of alternative means may include, but are not limited to, the following: (1) acoustical seals for doors and windows opening to the exterior; (2) consideration of the type, location, and size of windows; and (3) sealing or baffling of openings and vents. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

d. Level of Significance after Mitigation

The noise reduction measures prescribed in Mitigation Measure G-1 would achieve a minimum 5-dBA reduction along areas of sensitive receptors where the line-of-sight to ground-level construction activity that occurs on the Project site is broken. Regulatory Measure G-1 would preclude construction-period noise impacts from occurring during the noise-sensitive night time periods, or at any time on Sundays or holidays. Noise level reductions attributable to Mitigation Measures G-2 and G-3 and Project design features (e.g., use of noise mufflers and on site storage of construction equipment) are not easily quantifiable, but implementation of such measures would reduce the noise level impact associated with construction activities to the extent practicable. Nevertheless, Project construction activities would

intermittently increase the daytime noise levels at nearby sensitive land uses during construction activities by more than the 5-dBA significance threshold. As such, noise impacts during construction are concluded to be significant and unavoidable.

Project development would not result in any significant noise impacts to off-site receptors during long-term Project operations. With implementation of Mitigation Measure G-6, on site residents would not be exposed to inappropriately high noise levels from off-site activities (e.g., vehicle traffic on adjacent roadways).

## 8. Hazards and Hazardous Materials

a. Environmental Impacts

According to the Phase I environmental assessments completed for the Project site, there are no potential recognized environmental conditions (RECs) within any of the five development parcels. In addition, there is no evidence at the Project site of asbestos; hazardous materials use, storage or waste; or hazardous air emissions. It is anticipated that hazardous materials including fertilizers, herbicides and pesticides would be used to maintain the landscaping within the Civic Park, the Grand Avenue streetscape program as well as the five development parcels. In addition, hazardous materials associated with maintenance activity within the five development parcels would be present at the Project site. Since the transport, use, and storage of these materials would be managed in accordance with applicable federal, state, and local regulations, these materials would not be expected to pose significant risks to the public or the environment. Consequently, construction and operation under the Project with County Office Building Option and the Project with Additional Residential Development Option would not expose people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As such, construction and operation under both Options would not result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials, and impacts would be less than significant.

b. Cumulative Impacts

Under existing federal and state regulations, potential hazardous materials located on any of the 93 related project sites would be identified and remediated prior to construction and operation of any habitable facility. As such, any groundwater or soil contamination occurring on the related project sites would be addressed in accordance with applicable regulations and mitigation measures during the permitting process by the applicable responsible agencies. Remediation activities in accordance with federal, state, and local regulations would, therefore, reduce any significant impacts associated with hazardous materials to less than significant levels. Therefore, with monitoring and compliance with federal, state and local

regulations and procedures, the potential for cumulative impacts attributable to the Project as well as the related projects' transport, use, or disposal of hazardous materials would be less than significant.

c. Mitigation Measures

The proposed Project would have less than significant impacts with regard to hazards and hazardous material. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure H-1: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall properly decommission all unused groundwater monitoring wells, per applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The Regional Water Quality Control Board shall enforce compliance with this measure.

Regulatory Measure H-2: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall test for the presence or absence of hydrogen sulfide and methane beneath the site by subsurface sampling. Should the sampling result in the discovery of hydrogen sulfide and/or methane, appropriate health and safety measures shall be implemented in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure H-3: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall take fill samples from each of the five parcels, and shall analyze these samples for contaminants at elevated concentrations. Should elevated contaminant concentrations be discovered, appropriate measures shall be implemented in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure H-4: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall undertake an appropriate investigation to ascertain whether any hazardous conditions would occur as a function of implementing the streetscape improvements along Grand Avenue and/or the Civic Park. Should elevated concentrations of contaminants be identified, appropriate measures shall be implemented

in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure H-5: Prior to demolition or renovation in the Civic Center Mall, the responsible parties for implementation of the Civic Park under the applicable agreements shall perform an asbestos-sampling survey to determine the presence of asbestos containing materials. If such materials should be found, the responsible parties for implementation of the Civic Park shall prepare and implement an Operations and Maintenance Plan that meets all applicable federal, state and local requirements. This plan shall safely maintain asbestos containing materials that remain on the site. The County's CAO or its designee shall determine compliance with this measure.

Regulatory Measure H-6: Prior to the start of any demolition activities or renovation on any painted surfaces at the Project site, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall conduct a survey of lead based paint (LBP) to determine the level of risk posed to maintenance personnel, construction workers, facility staff, and patrons from exposure to the paints present at the site. Any recommendations made in that survey related to the paints present at the Project site shall be implemented prior to the demolition or renovation of said painted surfaces. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

d. Level of Significance After Mitigation

Impacts associated with the potential discovery of hazardous and non-hazardous materials on the Project site would be reduced to a less than significant level with compliance with the above regulatory measures.

**9. Fire Services**

a. Environmental Impacts

Construction activities may temporarily increase the demand on fire services due to the presence of combustible materials within the Project site. Construction may also result in temporary lane closures that would potentially affect emergency access. With the implementation of regulatory measures and notification to the LAFD of all construction scheduling, the wide selection of alternative routes, and the

temporary nature of the closures, any lane closures, should they occur, would not substantially affect the capacity of the LAFD to serve the Project site. During Project operations, occupancy of the five development parcels and high-attendance events associated with the Civic Park would increase the demand for LAFD fire services. However, the Project is within City Fire Code-required response distances, which would facilitate the LAFD in reaching emergency situations occurring within the Project site. In addition, automatic fire sprinkler systems in all structures, fire hydrants installed to LAFD specifications, and supplemental fire protection devices would be incorporated into new Project structures, as required by the Fire Code. As the Project site is within the service area of four Task Force truck and engine companies, Project operations are anticipated to result in less than significant impacts to LAFD staff and equipment capabilities. Notwithstanding, standard LAFD requirements that ensure the safety of the Project would be complied with.

b. Cumulative Impacts

The LAFD has determined that development of the Project, in conjunction with other approved and planned projects, may result in the need for the following: (1) increased staffing at existing facilities; (2) additional fire protection facilities; and (3) relocation of existing fire protection facilities. However, as related project applicants would be required to coordinate with the LAFD to ensure that related project construction and operations would not significantly impact LAFD services and facilities, no significant cumulative impacts are anticipated.

c. Mitigation Measures

The proposed Project would have less than significant impacts with regard to fire services. Notwithstanding, the following regulatory measures and project design features have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure I.1-1: During demolition activities occurring during each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure sure that emergency access shall remain clear and unobstructed. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County Fire Department (LACoFD) shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-2: Prior to each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall prepare, and thereafter implement, plans and

specifications to ensure that the construction contractor is apprised of the requirement to maintain access to sub-surface parking structures associated with the Civic Center Mall, the Music Center, and the Colburn School for Performing Arts. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-3: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall maintain access for emergency response personnel to the Kenneth Hahn Hall of Administration, the Paseo de los Pobladores de Los Angeles, the County Courthouse, the Colburn School for Performing Arts, and the Walt Disney Concert Hall. The LAFD shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-4: Prior to each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, a plan to ensure that emergency evacuation from the northwest side of the County Mall and Colburn School for Performing Arts, the southeast side of the Music Center and the Walt Disney Concert Hall would not be impeded by construction of the individual Project elements. With respect to the plan for the Mall, it must be prepared to coordinate with emergency evacuation plans for the Courthouse and the Hall of Administration. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-5: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that sufficient fire hydrants shall remain accessible at all times during Project construction. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-6: Prior to the start of each construction phase and during Project operations, the Developer, with regard to the five development parcels shall comply with

all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, and the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708). The City of Los Angeles Fire Department (LAFD) shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-7: During Project operations, the Developer, with regard to the five development parcels shall maintain all access roads, including fire lanes, in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Operations

The following regulatory measures for fire protection and services are based on information provided by the LAFD and shall be implemented for the Project:

Regulatory Measures

Regulatory Measure I.1-8: Prior to the start of each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of the Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications in accordance with LAFD requirements, and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the five development parcels or the Streetscape Program. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

Regulatory Measure I.1-9: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall prepare, and thereafter implement, plans in accordance with LACoFD requirements, and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the Civic Park. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-10: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, a plan that will assure that any required fire hydrants that are installed shall be fully operational and accepted by the Fire Department prior to any building construction. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-11: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall submit plot plans indicating access roads and turning areas to the LAFD for review and approval. The Developer, with regard to the five development parcels shall implement the approved plot plans. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-12: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall prepare, and thereafter implement, engineering plans that show adequate fire flow and placement of adequate and required public and private fire hydrants. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-13: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall provide emergency access for Fire Department apparatus and personnel to and into all structures. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-14: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that will provide that any private roadways for general access use and fire lanes shall not be less than 20 feet wide and clear to the sky. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-15: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that will provide that any fire lanes and dead end streets shall terminate in a cul-de-sac or other approved turning area. No dead end street or fire lane shall be greater than 700 feet in length or secondary access shall be required. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-16: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that designs any proposed development utilizing cluster, group, or condominium design not more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-17: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that designs fire lanes to be not less than 28 feet in width. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-18: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, where above ground floors are used for residential purposes, shall prepare, and thereafter implement, a plan that interprets the access requirement as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of the residential units. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-19: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall prepare, and thereafter implement, a plan that designs the entrance or exit of all ground level residential units to be no more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-20: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides access that requires the accommodation of Fire Department apparatus, shall design the minimum outside radius of the paved surface to be 35 feet. An additional six

feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-21: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall not construct any building or portion of a building to be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-22: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall prepare, and thereafter implement, a plan that provides for access that requires accommodation of Fire Department apparatus, a design for overhead clearances to be not less than 14 feet. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-23: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides for additional vehicular access required by the Fire Department, where buildings exceed 28 feet in height. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-24: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall prepare, and thereafter implement, a plan that provides, where fire apparatus shall be driven onto the road level surface of the subterranean parking structure, for the structure to be engineered to withstand a bearing pressure of 8,600 pounds per square foot. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-25: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall record any private streets as Private Streets and Fire Lanes. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-26: During operation of the Project, the Developer, with regard to the five development parcels, shall provide that all electric gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety, or other appropriate City agency or department, granting a Certificate of Occupancy. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-27. Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall prepare, and thereafter implement, a plan that would not construct any building or portion of a building more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel with the exception that dwelling unit travel distance shall be computed to the front door of the unit. The LAFD shall determine compliance with this measure with regard to the five development parcels. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.1-28. Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall submit plans to the Fire Department for review and approval. Where rescue window access is required, the Developer, with regard to the five development parcels, shall incorporate conditions and improvements necessary to meet accessibility standards as determined by the LAFD. The LAFD shall determine compliance with this measure.

Regulatory Measure I.1-29. During operations of the Project, the Developer, with regard to the five development parcels shall have the curbs of all public street and fire lane cul-de-sacs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac. The LAFD shall determine compliance with this measure with regard to the five development parcels.

Regulatory Measure I.1-30. During operations of the Project, planning for large events at the Civic Park shall be implemented by the County or County Park Operator to reduce potential adverse affects on emergency access. As part of the planning process, representatives of the LACoFD, County Office of Public Safety, LAFD, LAPD and LADOT shall be advised of the activities and consulted to establish appropriate procedures for crowd and traffic control. Plans shall be submitted to the County Chief Administrative Officer for review and approval.

Project Design Feature

Project Design Feature I.1-1: Prior to the start of each construction phase, the Developer, with regard to the five development parcels shall submit building plans to the LAFD for review and approval that demonstrate that automatic fire sprinklers shall be installed in all structures. The LAFD shall determine compliance with this measure.

d. Level of Significance After Mitigation

After compliance with all fire safety regulations and the incorporation of regulatory measures, no significant unavoidable impacts are anticipated with respect to fire services.

**10. Police Services**

a. Environmental Impacts

Project construction may result in temporary lane closures that would potentially affect emergency access. By notifying the LAPD of all construction scheduling, the temporary nature of any closures, and the availability of alternative routes, any lane closures would not significantly affect emergency access or response times. Furthermore, during construction, traffic management personnel (flag persons) would be trained to assist in emergency response, and on-site security measures would reduce theft and other demands on police services. Therefore, construction activities are not expected to significantly affect the capacity of the LAPD to adequately serve the Project site. With Project operation, increased activity within the five development parcels and the Civic Park would likely result in an increased demand for police services. Through the provision of private security personnel in the park, the demand for services provided by the LAPD is not anticipated to increase over existing conditions. The Project's combined residential and employment population would reduce the officer per resident ratio and, assuming the same number of officers in the LAPD Central Area station as under existing conditions, the ratio of crimes that are handled by each officer would increase from approximately 20 to 23.4. This level of increased demand in the context of occurring over an entire year would not substantially exceed LAPD's capacity and would, thus, be a less than significant impact.

b. Cumulative Impacts

The residential and employment increases generated by 61 of the 93 related projects that are located in the LAPD Central District would reduce the officer per resident ratio, assuming the same number of officers in the LAPD Central Area station as under existing conditions, the ratio of crimes that would be handled by each officer would increase from approximately 20 per officer to 57 crimes per officer. Although the operation of Project would have a less-than-significant impact on police services, because the list of related projects is extensive and, if all related projects were built, the combined Project and related projects would have a significant cumulative impact with regard to police protection services. This level of increased demand would substantially exceed the LAPD's capacity to provide services from the Central Area station. However, if the City added resources in response to growth, then cumulative impact would be less than significant. Yet, it is conservatively assumed that the City may not be able to add such resources commensurate with such population growth, and, therefore, the cumulative impact to police services is determined to be significant.

c. Mitigation Measures

The proposed Project would have less than significant impacts with regard to police services. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Construction

Regulatory Measures

Regulatory Measure I.2-1: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall provide clear and unobstructed LAPD access to the construction site. The LAPD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.2-2: During ongoing construction, the Developer, with regard to the five development parcels shall provide security features on the construction site(s), such as guards, fencing, and locked entrances. The LAPD shall determine compliance with this measure.

Operations

Regulatory Measure I.2-3: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, shall submit plot plans for all proposed development to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented by the Developer to the extent feasible.

Regulatory Measure I.2-4: Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plot plans for all proposed development to the County Office of Public Safety for review and comment. Security features subsequently recommended by the Office of Public Safety shall be implemented by the County or County Park Operator to the extent feasible.

Regulatory Measure I.2-5: At the completion of each construction phase, the Developer, with regard to the five development parcels shall file as-built building plans with the LAPD Central Area Commanding Officer. Plans shall include access routes, floor plans, and

any additional information that might facilitate prompt and efficient police response. The LAPD shall determine compliance with this measure.

Regulatory Measure I.2-6: During Project operations, the Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park shall install alarms and/or locked gates on doorways providing public access to commercial facilities. The LAPD shall determine compliance with this measure with regard to the five development parcels. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.2-7: During Project operations, the Developer, with regard to the five development parcels shall not plant landscaping in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users. The LAPD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program.

Regulatory Measure I.2-8: Additional lighting shall be installed where appropriate, including on the Project site and in parking garages, as determined in consultation with the LAPD with regard to the five development parcels and the County Office of Public Safety with regard to the Civic Park. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement these measures prior to the completion of construction for each of those Project components.

Regulatory Measure I.2-9: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, a plan that incorporates safety features \ into the Project's design to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include the provision of security personnel; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the parking garages, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets. The LAPD shall determine compliance with this measure with regard to the five development parcels. The County Office of Public Safety shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure I.2-10: Prior to the issuance of a certificate of occupancy for each construction phase and during Project operations, the Developer, with regard to the five development parcels, shall develop, and thereafter implement, a new or modified Security Plan to minimize the potential for on-site crime and the need for LAPD services. The plan would outline the security services and features to be implemented, as determined in consultation with the LAPD. The LAPD shall determine compliance with this measure with regard to the five development parcels. The following shall be included in the plan:

a. Provision of an on-site security force that would monitor and patrol the Project site. During operational hours, security officers shall perform pedestrian, vehicular, and/or bicycle patrols.

b. Implementation of a video camera surveillance system and/or a closed-circuit television system;

c. Additional security features shall be incorporated into the design of proposed parking facilities, including "spotters" for parking areas, and ensuring the availability of sufficient parking either on- or off-site for all building employees and anticipated patrons and visitors;

d. Security lighting incorporating good illumination and minimum dead space in the design of entryways, seating areas, lobbies, elevators, service areas, and parking areas to eliminate areas of concealment. Security lighting shall incorporate full cutoff fixtures which minimize glare from the light source and provide light downward and inward to structures to maximize visibility;

e. Provision of lockable doors at appropriate Project entryways, offices, retail stores, and restaurants;

f. Installation of alarms at appropriate Project entryways and ancillary commercial structures;

g. All businesses desiring to sell or allow consumption of alcoholic beverages are subject to the issuance of a Conditional Use Permit by the City;

h. Accessibility for emergency service personnel and vehicles into each structure, and detailed diagram(s) of the Project site, including access routes, unit numbers, and any information that would facilitate police response shall be provided to the Central Area Commanding Officer.

i. In addition, security procedures regarding initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance shall be outlined in the Security Plan. The plan would be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.

Regulatory Measure I.2-11: Prior to the issuance of a certificate of occupancy for each construction phase and on-going during operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall develop, and thereafter implement, a Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by the LAPD with regard to the five development parcels and the County Office of Public Safety with regard to the Civic Park, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.

d. Level of Significance after Mitigation

With the implementation of the regulatory measures listed above, the Project's impacts on police protection services or response times would be less than significant. Cumulative impacts related to adequate police protection services would remain significant and unavoidable.

**11. Schools**

a. Environmental Impacts

The Project with County Office Building Option would generate a potential total of 560 students consisting of 250 elementary school students, 141 middle school students, and 169 high school students. The Project with Additional Residential Development Option would generate a potential total of 632 students, consisting of 315 elementary school students, 157 middle school students, and 161 high school students. Under either Option, the Project would contribute to the projected seating shortages at the elementary, middle and high schools that would serve the Project site. With the addition of new LAUSD schools that would be open by 2009, the Project's significant impacts on the middle and high schools would be eliminated as sufficient capacity would be available to accommodate the Project's middle and high school students. However, this is not the case with elementary schools. As such, the Project would continue to have a significant impact on elementary school capacity.

b. Cumulative Impacts

The residential and commercial components of the 93 related projects located within the same attendance boundaries as the Project would generate approximately 2,773 elementary school students, 240 middle school students, and 4,700 high school students in the respective Castelar, Gratts, and Ninth Street Elementary Schools, Virgil Middle School, and Belmont High School. These middle and high school students, combined with the Project's students, would be dispersed throughout the attendance boundaries of both the existing and the newly constructed schools. Cumulative projects would exceed the capacity of all of the schools served by the Project and, therefore, a significant cumulative impact would occur. The Project and each related project would pay new school facility development fees and, under the provisions of Government Code Section 65995, the payment of these fees would constitute full mitigation. Thus, cumulative impacts on schools would be less than significant.

c. Mitigation Measures

Based on the preceding analysis, the students generated by the Project could not be accommodated within the existing facilities at the identified schools. The additional elementary students generated by the Project would result in a potentially significant impact at Castelar Elementary School as neither expansion of the existing facilities nor the construction of new elementary schools in the school's attendance area is currently planned. Despite the planned construction of the new Gratts Primary Center, students generated by the Project would also result in a potentially significant impact to Gratts Elementary School. With regard to Virgil Middle School and Belmont Senior High School, the construction of additional facilities planned to relieve overcrowding would provide enough seats to sufficiently accommodate Project-generated middle and high school students, and thus, Project impacts would be less than significant. Notwithstanding, the Developer would be required to pay new school facility development fees at the time of building permit issuance. Pursuant to California Government Code Section 65995, payment of the developer fees required by State law provides full and complete mitigation of the impacts of the Project as well as the Additional Residential Development Option on school facilities, thereby reducing impacts to a less than significant level. Through compliance with Government Code Section 65995, impacts on schools would be less than significant, and no other mitigation measures are required.

Mitigation Measure

Mitigation Measure I.3-1: Prior to the issuance of each building permit, the Developer, with regard to the five development parcels, shall pay school mitigation fees pursuant to the provisions of California Government Code Section 65995. The City's Department of Building and Safety, or other appropriate City agency or department shall determine compliance with this measure.

d. Level of Significance After Mitigation

Pursuant to the provisions of Government Code Section 65995, a project's impact on school facilities is fully mitigated through the payment of the requisite school facility development fees current at the time building permits are issued. As the Developer of the five development parcels is required to pay school facility development fees, impacts under the Project are concluded to be less than significant.

**12. Parks and Recreation**

a. Environmental Impacts

Construction of the proposed improvements in Civic Park would require closure of the existing Civic Mall to implement those improvements. This would limit park availability and usage. Impacts on park usage could occur within the immediate area of construction activity and adjacent park areas that might be sensitive to construction activities. It is not known if the entire Park area would be affected at a single time, or if park improvements would be implemented on a smaller basis; e.g., block by block. As the construction activities could adversely affect park usage, the Project is considered to have a significant, short-term impact on parks during construction.

The required dedication of parkland from a project is determined by the number of residents within the project. Under the Quimby Act, which is implemented through the LAMC, three acres per 1,000 residents are required. The Project with County Office Building Option is anticipated to generate approximately 2,925 residents and would be required to provide approximately 8.8 acres of park/recreation space. The Additional Residential Development Option is anticipated to generate approximately 3,777 residents and would be required to provide approximately 11.33 acres of park/recreation space. Since these requirements would not be fully achievable on-site, per the LAMC, the Developer would be required to either dedicate additional parkland or pay in-lieu fees for any land dedication requirement shortfall. Compliance with the LAMC would offset the Project's park/recreation shortfall and would avoid a significant impact.

b. Cumulative Impacts

No related projects are known to affect the use or availability of existing recreational resources, that would be affected by the Project, during their construction or operations phases. As the Project would prohibit the recreational use of the existing Civic Center Mall during the construction of the Project's Civic Park, cumulative impacts on recreational resources are considered significant.

Related projects combined with the Project with County Office Building Option would generate a total increase of approximately 31,877 residents. Combined with the Project with Additional Residential Development Option, the related projects would cumulatively generate approximately 32,729 residents.

The estimated park space requirement to meet the three-acre per 1,000 residents standard for the combined population under the two Options would be approximately 95.5 acres and approximately 98.2 acres, respectively. As with the Project, compliance with the LAMC to either dedicate additional parkland or pay in-lieu fees for any land dedication requirement shortfall would offset the park/recreation demands of the Project and would avoid a significant cumulative impact. If in lieu fees are paid, such fees would be used by the City to enhance park and recreational facilities in the appropriate geographic areas.

c. Mitigation Measures

The Project would not meet the land dedication requirement pursuant to Government Code Section 66477 (Quimby Act). In response, the following mitigation measure has been identified to address the Project's potentially significant impact.

Mitigation Measure

Mitigation Measure I.4-1: Prior to the issuance of a certificate of occupancy, the Developer, with regard to the five development parcels, shall: (1) dedicate additional parkland such that the Project would provide a total of 3 acres per 1,000 Project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) a combination of the above. The City's Department of Building and Safety, or other appropriate City agency or department shall determine compliance with this measure.

d. Level of Significance After Mitigation

The potential impact of the closure of sections of the Civic Park due to construction activity is considered to be a short-term, significant and unavoidable, impact. Upon completion of the Project, the affected park areas would return to operations with an enhanced level of operation, due to improvements that were implemented during the construction phase. Compliance with the mitigation measure for meeting park demand would reduce any impacts due to park dedication shortfalls to less than significant levels.

**13. Libraries**

a. Environmental Impacts

The increase in residential population, employees and patrons, under the Project would increase demand on LAPL facilities in this area, including the Central Library as well as the Little Tokyo and Chinatown Branch Libraries, although the Project is not expected to cause an increase in the community population that would exceed the LAPL-defined service target population. However, LAPL has indicated that the Project would impact the Central Library and that the fee of $200 per capita would offset the increase in service demand. However, the detailed analysis provided in this section of the Draft EIR demonstrates

that the Project would not cause a significant impact on library services, and the LAPL did not provide any data in its NOP response letter to the contrary. Accordingly, no mitigation measures are required. In addition, it should be noted that the LAPL has not taken the necessary legal steps to impose a mitigation fee on all new development projects in its jurisdiction.

b. Cumulative Impacts

Population increases created by the 93 related projects in combination with the Project would increase the demand for LAPL services within the Project area. If a large number of related projects were to be developed without the payment of fees, notable cumulative impacts on library services may occur. [

c. Mitigation Measures

The Project would result in no significant impacts on library services, and no mitigation measures are required.

d. Level of Significance After Mitigation

No significant and unavoidable adverse impacts relative to LAPL facilities and services would occur as a result of the Project. However, significant cumulative impacts would occur if a large number of related projects would not contribute to voluntary or mandatory library fees.

**14. Water Supply**

a. Environmental Impacts

Water use during Project construction would be intermittent and temporary in nature, resulting in a less than significant impact on water supply. The operation of uses associated with the Project with County Office Building Option would have an average potable water demand of 844,403 gallons per day (gpd) and a peak demand of 1,435,484 gpd. The Project with Additional Residential Development Option would generate an average water demand of 786,881 gpd and a peak demand of 1,337,696 gpd. The Los Angeles Department of Water and Power (LADWP) has concluded in its Water Supply Assessment dated April 13, 2006 that adequate water supplies would be available to meet the Project's water demand. Therefore, implementation of the Project would result in a less than significant impact on water supply.

Based on LAFD fire flow requirements as well as pressure flow reports from the City's Department of Water and Power (LADWP), no upgrades to the existing water system serving Parcels Q, M-2, and the Civic Park would be required. However, the installation of new water lines would be required along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L.

b. Cumulative Impacts

Development of the 93 identified related projects would cumulatively contribute, in conjunction with the Project to the water demand in the Project area, although combined demand would be slightly less under the Project with Additional Residential Option. Related projects are anticipated to be developed in compliance with State and water conservation regulations and within the build-out scenario of the Community Plans and the City of Los Angeles General Plan elements. Further, the LADWP Water Supply Assessment concluded that there are adequate water supplies to meet all existing and future water demands for the next 20 years. As such, impacts associated with cumulative water demand would be less than significant.

c. Mitigation Measures

The proposed Project would have a significant impact with regard to the availability of water lines along Second Street with regard to Parcels W-1/W-2 and L. All other water-related impacts are less than significant. As such, a mitigation measure has been identified to address the one significant impact. In addition, a series of regulatory measures are identified that would result in reducing the water demand attributable to the Project.

Mitigation Measures

Mitigation Measure J.1-1: Prior to initial occupancy of the buildings within Parcels L and W-1/W-2, the Developer shall install new water lines along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L. The City's Department of Public Works shall review and approve all plans related to these new water lines. The Developer shall be responsible for the implementation of these improvements.

Regulatory Measures

Regulatory Measure J.1-1: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall call DIG-ALERT to identify and mark on the ground surface the locations of existing underground utilities. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.1-2: Prior to the start off each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall perform potholing of existing water and gas mains to verify the depth of cover. If the depth of cover over the lines is shallow and the total street pavement section is thick (around 24 inches), then the temporary cover over the lines during construction may be reduced to 12 inches or less. Under these circumstances, protective measures shall be implemented to prevent damage or breakage of the lines during the pavement sub-grade preparation process, notices of service interruption, if necessary, shall be provided to customers in accordance with DWP-Water and ACG requirements. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.1-3: Prior to issuance of building permits for each construction phase, the Developer, with regard to the five development parcels, shall pay the appropriate fees as may be imposed by the City's Department of Building and Safety, or other appropriate City agency or department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements. Compliance with this measure shall be determined by the City's Department of Building and Safety, or other appropriate City agency or department.

Regulatory Measure J.1-4: Prior the issuance of building permits for each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park Plan under the applicable agreements, shall coordinate with the Los Angeles Department of Water and Power to conduct a flow test to confirm that the existing water system meets fire flow requirements imposed by the LAFD for the Project. The Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park Plan under the applicable agreements, shall undertake and complete required improvements as identified by the LADWP, based on the findings of the flow test. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Operations

Regulatory Measures

Regulatory Measure J.1-5: During Project operations, the Developer, with regard to the five development parcels, shall incorporate Phase I of the City of Los Angeles' Emergency Water Conservation Plan into all privately operated parcels. The Plan prohibits hose watering of driveways and associated walkways, mandates decorative fountains to use recycled water, mandates drinking water in restaurants to be served upon request only, and provides that water leaks are repaired in a timely manner. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure J.1-6: During Project operations, incorporate Los Angeles County water conservation policies into the operation of the Civic Park, and the County Office Building, if the Project proceeds with the County office building option. The responsible parties for the implementation of the Civic Park under the applicable agreements, and the County with regard to the County Office Building, if the Project proceeds with the County office building option, shall be responsible for implementing this measure. The implementation of this measure shall be subject to the review and approval of the County's CAO or its designee.

Regulatory Measure J.1-7: During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements and the County Office Building operator shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.1-8: During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall install automatic sprinkler systems to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation, and sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. The City's Department of Public Works, or other appropriate City

agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

d. Level of Significance After Mitigation

The total estimated water demand for the Project at build out is not expected to exceed available supplies during normal, single dry and multiple dry water years during the current 20-year projection, nor is it anticipated to exceed the available capacity within the distribution infrastructure that would serve the Project site. Other than connections from the Project site to the water mains and the installation of new water lines along Second Street, the construction of a new or upgraded distribution and conveyance infrastructure would not be required. With regulatory compliance and incorporation of the mitigation measures discussed above, impacts to water supply associated with the Project would be less than significant.

**15. Wastewater**

a. Environmental Impacts

The operation of uses associated with the Project with County Office Building Option would generate 631,650 gallons per day (gpd) of wastewater and a peak flow of 1,073,805 gpd. The Project with Additional Residential Development Option would generate 592,070 gpd on average and a peak flow of 1,006,519 gpd. By complying with the provisions of the City's Sewer Allocation Ordinance, wastewater generation resulting from operation of the Project would not substantially exceed the future scheduled capacity of the Hyperion Treatment Plan (HTP), nor would it cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or would cause a sewer's capacity to become constrained. Therefore, implementation of the Project would result in a less than significant impact.

b. Cumulative Impacts

Development of the 93 identified related projects, in conjunction with the Project would cumulatively contribute to wastewater generation in the Project area. The Project with Additional Residential Option would generate nearly seven percent less wastewater than that of the proposed Project with County Office Building Option. The wastewater anticipated to be discharged by the related projects along with the Project with County Office Building Option is 7.3 million gpd, which represents approximately 1.6 percent of the HTP's full capacity of 450 million gpd. Each of the individual related projects would be subject to the LADWP's determination of whether there is allotted sewer capacity available prior to the formal acceptance of plans and specifications by the Department of Building and Safety. Therefore,

cumulative impacts to the local and regional sewer system for the Project, in conjunction with the identified related projects, would be less than significant.

c. Mitigation Measures

The proposed Project would have less than significant impacts with regard to wastewater service. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure J.2-1: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park shall comply with City ordinances limiting connections to the City sewer system, in accordance with City Bureau of Sanitation procedures. The City's Department of Public Works, Sanitation Bureau, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall ensure compliance with this measure.

Regulatory Measure J.2-2: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park Plan, shall prepare and, thereafter, implement building plan specifications for the installation of low-flow water fixtures and further encourage reduction of water consumption to minimize wastewater flow to the sewer system, in accordance with applicable water conservation requirements. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall ensure compliance with this measure.

d. Level of Significance After Mitigation

With the implementation of the recommended mitigation measures discussed above, any local deficiencies in sewer lines would be identified and remedied and wastewater generation rates would be reduced. As such, less than significant impacts on wastewater conveyances and the capacity of the HTP would occur.

## 16. Solid Waste

a. Impacts

Construction debris attributable to Project development would generate approximately solid debris, which would amount to approximately 31,120 tons of landfill waste. The total remaining permitted capacity for inert waste in Los Angeles County is estimated to be approximately 69.94 million tons, a capacity that would be exhausted in approximately 2065. Therefore, impacts of the Project's construction on solid waste would be less than significant. Operation of the Project with County Office Building Option would generate approximately 7,012 tons of solid waste per year, which would constitute less than 0.001 percent of the City's annual 9.11 million tons of total solid waste before recycling and diversion. The Project with Additional Residential Development Option would generate even less solid waste (2,717 tons per year before recycling and diversion). Thus, waste generated by the Project would not exacerbate the existing shortfall of landfill capacity to the point of altering the projected timeline for landfills within the region to reach capacity. The available capacity of the existing and/or planned landfills would not be exceeded and impacts on solid waste disposal would be less than significant.

b. Cumulative Impacts

Development of the 93 related projects would generate solid waste during their respective construction periods, and on an on-going basis following the completion of construction. The total cumulative construction debris from the related projects and proposed Project would total 63,000 tons. This would comprise approximately 0.1 percent of the remaining inert landfill disposal capacity of 69.94 million tons and, as such, cumulative impacts on inert landfill capacity would be less than significant. During operation, the total cumulative solid waste generation is estimated to be 112,015 tons per year under the Project with County Office Building Option and 107,660 tons per year under the Project with Additional Residential Development Option. These levels of cumulative annual solid waste generation represent approximately 1.2 percent of the total solid waste generated in Los Angeles County in 2003. Based on these small percentages, and the County forecast of 15 years of landfill availability, cumulative impacts on municipal landfill capacity are concluded to be less than significant.

c. Mitigation Measures

The proposed Project would have less than significant impacts with regard to solid waste service. Notwithstanding, the following regulatory measures have been identified to address the Project's less than significant impact.

Regulatory Measures

Regulatory Measure J.3-1: Prior to the issuance of a certificate of occupancy for each construction phase, and thereafter during Project operations, the Developer, with regard to the five development parcels, shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the five development parcels. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

Regulatory Measure J.3-2: Prior to the issuance of each certificate of occupancy, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, a plan that designs all structures constructed or uses established within any part of the proposed Project site to be permanently equipped with clearly marked, durable, source sorted recyclable bins at all times to facilitate the separation and deposit of recyclable materials. The City's Department of Public Works, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.3-3: Prior to the issuance of each certificate of occupancy, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements, shall prepare, and thereafter implement, a plan that designs primary collection bins to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.3-4: During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall continuously maintain in good order for the convenience of businesses, patrons, employees and park visitors clearly marked, durable and separate bins on the same lot, or parcel to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and

require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

Regulatory Measure J.3-5: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction. The City's Department of Building and Safety, or other appropriate City agency or department, shall review and approve the plan with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall review and approve the plan with regard to the Civic Park.

d. Level of Significance After Mitigation

The Project would not cause the available capacity of the existing and/or planned landfills to be exceeded, and impacts due to construction and operations would be less than significant. Nonetheless, mitigation measures have been proposed to identify compliance with plans, programs and policies for recycling, waste reduction and waste diversion.

Proposed Mitigation Measures would reduce identified potentially significant impacts to less than significant levels, although no feasible mitigation measures exist to reduce the following several potentially significant and unavoidable impacts to less than significant levels.

## I. IMPACT OF THE PROJECT AFTER MITIGATION

According to the analysis in the Final EIR, the following impacts are deemed to be significant and unavoidable after the imposition of all feasible mitigation measures:

**Land Use**

Zoning. Both Project Options require zone changes and variances to permit the development of Parcels Q, W-1/W-2, L and M-2 as proposed. With the granting of such zone changes and variances, which may be granted after certification of the Final EIR by the Lead Agency and concurrently with action on entitlements requested from the City of Los Angeles, this significant zoning impact would be eliminated. However, since the Project under both Options is not in compliance with the current zoning designations, it is conservatively concluded that for the purposes of CEQA there would be a significant impact relative

to zoning. Based on the information available regarding the related projects, it is reasonable to assume that some of the related projects may require a variety of discretionary zoning actions (e.g., zone changes, variances, etc.). Therefore, a significant cumulative impact with regard to zoning compliance would occur.

**Traffic, Circulation and Parking**

Haul Truck Traffic. Hauling activities during the initial six to eight months of construction of each block, when haul trucks would carry excavated material from the site, could generate up to 300 truck trips per day. Because some of these trips would occur during the A.M. peak hour, a potentially significant short-term impact may occur. Hauling required for the construction of some of the 93 related projects would potentially overlap with the initial six to eight months of construction for each of the Project's development parcels. Therefore, haul truck impacts would be cumulatively significant.

Lane Closures. It is not expected that complete closures of any streets would be required during Project construction, although they could occur due to unforeseen circumstances in which case they could cause temporary significant impacts. However, it is expected that there would need to be certain temporary traffic lane closures on streets adjacent to the Project site for certain periods, although the specific location and duration of such closures is unknown at this time. It is expected that, at most, one traffic or parking lane adjacent to the curb may need to be closed at certain locations for certain periods of time. Such lane closures could occur for periods of up to 4 to 6 months, or up to approximately 18 to 24 months, depending on the stage of construction. Although temporary in nature, such lane closures would cause an unavoidable, significant traffic impacts during such periods of time. In addition, the impact of the Project and certain related projects would cumulatively contribute to potential congestion resulting from temporary lane closures.

Civic Mall Garage Ramp Reconstruction. The reconfiguration of the ramps to/from the existing Civic Center Mall parking garage during the construction of the Civic Park would require the ramps to be shut down for a period of time. During that time, traffic would have to enter and exit the existing Civic Center Mall garage via either the Hill Street ramps, or via the Music Center garage. Similarly, during the reconfiguration and temporary closure of the Hill Street ramps during the construction of the Civic Park, traffic would have to enter and exit the existing Civic Center Mall garage via the Grand Avenue ramps. The diversion of traffic to alternate garage entrances would only affect the streets in the immediate vicinity of the existing Civic Center Mall parking garage, but could potentially create temporary and short-term significant traffic impacts. The temporary closure of access to related project sites would not impact the same streets adjacent to the County Garage block. However, other temporary access closures at any of the other sites, particularly the 15 related projects located on Grand Avenue, Olive Street, and Hill Street, would cumulatively contribute to congestion and, as such, would be cumulatively significant.

Intersection Capacity During Project Operations. The Project with County Office Building Option would result in a significant unavoidable impact on one intersection in the A.M. peak hour and on 12 intersections in the P.M. peak hour. All of the impacted intersections would continue to operate at LOS D or better, except for two that would operate at LOS E in the P.M. peak hour (Hope Street / Temple Street / US-101 Ramps; and Broadway / First Street), and one that would operate at LOS F in the P.M. peak hour (Grand Avenue / US-101 / I-110 Ramps). Under the Project with Additional Residential Development Option, no intersections in the A.M. peak hour would be significantly impacted, while seven (7) intersections in the P.M. peak hour would be significantly impacted. All of the significantly impacted intersections would continue to operate at LOS D or better, except for the intersection of Grand Avenue / US-101 / I-110 Ramps, which would operate at LOS F in the P.M. peak hour. Thus, the extent of significant intersection impacts, under the Project with Additional Residential Development Option would not be as great as under the Project with County Office Building Option. The analysis of intersection service levels incorporate cumulative conditions that include related projects and ambient growth.

Civic Park Operations. Early evening events in the Civic Park, or events associated with concerts/programs at the Music Center and the Walt Disney Concert Hall, may worsen traffic conditions during the P.M. peak hour. However, the number of such events would be infrequent and would not occur on a regular basis. Although Civic Park traffic impacts would be temporary in nature, impacts may, on occasion, be significant in magnitude. Annual events, festivals, and holiday events could also potentially have temporary and short-term (one-time) significant traffic impacts. Therefore, on occasion, the size of the event and other factors may cause Civic Park traffic impacts to be significant and unavoidable. During times in which events in the Civic Park would start earlier in the evening, or during annual events, festivals, and holiday events, Civic Park traffic, in combination with traffic generated by the related projects, would be cumulatively significant.

Advisory Agency Residential Parking Policy. Residential parking for the Project would not be consistent with the Deputy Advisory Agency Residential Policy (DAARP), which requires 2.5 spaces for each residential unit. As the proposed residential supply is less than the Advisory Agency Policy requirements, the Project is seeking an exception from that policy. The granting of the requested exception, should it occur, would be granted after certification of the Final EIR by the Lead Agency, but concurrently with action on the entitlements requested from the City. Should this exception be granted, residential parking impacts would be less than significant. However, until the exception is granted, the non-compliance is considered a significant and unavoidable impact of the Project.

**Aesthetics and Visual Resources**

Views. The Project would obstruct views of the Walt Disney Concert Hall and distant vistas to the north, possibly including the San Gabriel Mountains, from the Grand Promenade Tower, a 28-story residential

building located immediately south of Parcel M-2. Development on Parcels W-1/W-2 would substantially block views of City Hall from Olive Street, a public street. In addition, development on Parcel Q would block distant vistas to the north, possibly including the San Gabriel Mountains, from the upper stories of the Museum Tower residential building located south of Parcel Q and immediately east of MOCA. Related project No. 88 would block some easterly views of City Hall, from the existing Angelus Plaza residential towers. The Colburn School addition, combined with the Project, would have a significant cumulative view impact on the Museum Tower residential use. Therefore, view impacts are considered to be cumulatively significant.

Shade/Shadow. The Project would result in less than significant shading impacts with regard to the identified sensitive uses, however, a potentially significant cumulative shade shadow impact would occur with combined shading of the Angelus Plaza residential complex by Related Projects Nos. 9, 27, and 88, in conjunction with the proposed Project during the morning hours on the summer solstice.

**Historical Resources**

Significant impacts to the existing Civic Center Mall would occur if one or more the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point in the Civic Park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes. Additionally, significant impacts to the park would also occur if the Secretary of the Interior's Standards for the Rehabilitation of Historic Structures and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards") are not utilized in the rehabilitation process of the park. If the character-defining features noted above were retained and reused in a manner consistent with the Standards and as stipulated in this Draft EIR, then potential impacts to this resource would not occur and mitigation measures would not be required. The development of one or more related projects in the downtown area has the potential to affect listed or eligible resources. As the Project may result in a potentially significant impact with regard to the Civic Center Mall as a contributor to the potential Civic Center historic district, the Project and the related projects have the potential to cause a significant cumulative impact on historical resources.

**Air Quality**

Construction. Regional construction activities would exceed the SCAQMD's daily emission thresholds for regional NOX, CO and VOC after implementation of all feasible mitigation measures. Construction activities would also exceed the SCAQMD daily localized emission threshold for PM10 and NO2 , also

after implementation of all feasible mitigation measures. Related projects occurring within a similar time frame as the Project would increase short-term emissions for concurrent construction activities during any day of the Project's construction period. As a result, a significant and unavoidable cumulative impact with respect to construction emissions would occur.

Operations. The Project's operational air emissions would exceed the SCAQMD daily emission threshold for regional CO, VOC, PM10, and NOX emissions. In addition, regional concurrent construction and operational emissions would also exceed the SCAQMD's daily thresholds for CO, VOC, PM10, and NOX. The implementation of the Project would result in an increase in ongoing operational emissions, which would contribute to region-wide emissions on a cumulative basis. Accordingly, under the SCAQMD's methodological framework, the Project's cumulative air quality impacts are also concluded to be significant.

**Noise**

Construction. Construction activities would intermittently increase the daytime noise levels at nearby sensitive land uses by more than the 5-dBA significance threshold. All other noise impacts would be reduced to less than significant levels with mitigation. Noise impacts during construction of the proposed Project and each related project (that has not already been built) would be short-term and limited to the duration of construction and would be localized. However, since noise impacts due to construction of the proposed Project would be significant on its own, noise impacts due to construction of the proposed Project in combination with any of the related projects would also be cumulatively significant without mitigation.

**Police Services**

Although, with the implementation of mitigation measures, the Project's impacts on police protection services and response times would be less than significant, as the list of related projects is extensive and, if all related projects were built, the combined Project and related projects would have a significant cumulative impact with regard to police protection services. However, if the City added resources in response to this growth, then cumulative impacts would be less than significant.

**Parks and Recreation**

Construction of the Project would require the closure of the existing Civic Center Mall for varying durations of time to construct the proposed Civic Park as well as the proposed Streetscape Program improvements that are proposed to occur adjacent to the proposed Civic Park. The potential effect of construction on the existing recreational facilities within the existing Civic Center Mall is considered to be an unavoidable and significant, short-term impact. Cumulative impacts on recreational resources are

considered significant since the Project would result in a short-term significant impact on a recreational resource.

## J. DRAFT EIR COMMENT SUMMARY CHART

The following chart lists the Draft EIR comment letters, the speakers at the July 18, 2006 public meeting held during the Draft EIR review period and the issues expressed in those comments. In all, 17 comment letters were submitted in response to the Draft EIR, 13 persons spoke at the public meeting and one person submitted a comment form. Each of those comments is responded to in writing in Section V, Responses to Comments, of this Final EIR. .

| SUMMARY OF COMMENTS<br><br>GRAND AVENUE PROJECT<br>DRAFT EIR | Project Description | Land Use | Traffic, Circulation & Parking | Aesthetics & Visual Resources | Historical Resources | Population, Housing & Employment | Air Quality | Noise | Hazards and Hazardous Materials | Fire Services | Police Services | Schools | Parks & Recreation | Libraries | Water Supply | Wastewater | Solid Waste | Alternatives | Other Environmental Considerations | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **State and Regional Agencies** | | | | | | | | | | | | | | | | | | | | |
| **1. State of California Governor's Office of Planning and Research**, State Clearinghouse and Planning Unit, Terry Roberts, Director, State Clearinghouse, 1400 Tenth St., Sacramento, CA 95812, July 31, 2006. | | | | | | | | | | | | | | | | | | | | X |
| **2. State of California Governor's Office of Planning and Research**, State Clearinghouse and Planning Unit, Terry Roberts, Director, State Clearinghouse, 1400 Tenth St., Sacramento, CA 95812, August 3, 2006. (With attached letter from Caltrans). | | | X | | | | | | | | | | | | | | | | | |
| **3. State of California Department of Transportation, District 7,** Cheryl J. Powell, IGR/CEQA Program Manager, 100 Main Street, Suite 100, Los Angeles, CA 90012-3747, July 31, 2006. | | | X | | | | | | | | | | | | | | | | | |
| **4. State of California Department of Fish & Game,** South Coast Region, Larry L. Eng, PhD., 4949 Viewridge Avenue, San Diego, CA 92123, August 8, 2006. | | X | | | | | | | | | | | X | | | | | | | |

| SUMMARY OF COMMENTS<br><br>GRAND AVENUE PROJECT DRAFT EIR | Project Description | Land Use | Traffic, Circulation & Parking | Aesthetics & Visual Resources | Historical Resources | Population, Housing & Employment | Air Quality | Noise | Hazards and Hazardous Materials | Fire Services | Police Services | Schools | Parks & Recreation | Libraries | Water Supply | Wastewater | Solid Waste | Alternatives | Other Environmental Considerations | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **5. Southern California Association of Governments**, April Grayson, Associate Regional Planner, Intergovernmental Review, 818 West Seventh St., 12th Floor, Los Angeles, CA 90017, August 3, 2006. | | X | | | | X | | | | | | | | | | | | | | |
| **6. South Coast Air Quality Management District,** Steve Smith, Program Supervisor CEQA Division, 21865 Copley Drive, Diamond Bar, CA 91765-4178, August 2, 2006. | | | | | | | X | | | | | | | | | | | | | |
| **7. South Coast Air Quality Management District,** Steve Smith, Program Supervisor CEQA Division, 21865 Copley Drive, Diamond Bar, CA 91765-4178, August 3, 2006. | | | | | | | X | | | | | | | | | | | | | |
| **County of Los Angeles Agencies & Departments** | | | | | | | | | | | | | | | | | | | | |
| **8. County of Los Angeles Fire Department,** David R. Leininger, Chief, Forestry Division Prevention Services Bureau, 1320 North Eastern Avenue, Los Angeles, CA 90063-3294, August 21, 2006 | | | | | | | | | | X | | | | | | | | | | |

| SUMMARY OF COMMENTS<br><br>GRAND AVENUE PROJECT<br>DRAFT EIR | Project Description | Land Use | Traffic, Circulation & Parking | Aesthetics & Visual Resources | Historical Resources | Population, Housing & Employment | Air Quality | Noise | Hazards and Hazardous Materials | Fire Services | Police Services | Schools | Parks & Recreation | Libraries | Water Supply | Wastewater | Solid Waste | Alternatives | Other Environmental Considerations | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **9. Metropolitan Transportation Authority,** Susan F, Chapman, Program Manager Long Range Planning, One Gateway Plaza, Los Angeles, CA 90012-2952, August 3, 2006 | | | X | | | | | | | | | | | | | | | | | |
| **10. Superior Court of California, County of Los Angeles,** John A. Clarke, Executive Officer, 111 North Hill Street, Los Angeles, CA 90012-3014, July 24, 2006. | | X | X | X | | | | X | | X | | | | | | | | | | |
| **Other Governmental Agencies** | | | | | | | | | | | | | | | | | | | | |
| **11. Los Angeles Unified School District,** Rena Perez, Director Planning & Demographics, 355 S. Grand Avenue, Los Angeles, CA 90071, July 25, 2006. | | | | | | | | | | | | X | | | | | | | | |
| **Private Organizations** | | | | | | | | | | | | | | | | | | | | |
| **12. The Colburn School,** Joseph Thayer, Executive Director, 200 S. Grand Avenue, Los Angeles, CA 90012, August 1, 2006. | | | X | | | | | X | | | | | | | | | | | | |
| **13. Legal Aid Foundation of Los Angeles,** Benjamin S. Beach, Staff Attorney, 8601 S. Broadway, Los Angeles, CA 9003-3319, August 3, 2006. | | | X | | | X | X | | | | | | X | | | | | | | X |

| SUMMARY OF COMMENTS<br><br>GRAND AVENUE PROJECT<br>DRAFT EIR | Project Description | Land Use | Traffic, Circulation & Parking | Aesthetics & Visual Resources | Historical Resources | Population, Housing & Employment | Air Quality | Noise | Hazards and Hazardous Materials | Fire Services | Police Services | Schools | Parks & Recreation | Libraries | Water Supply | Wastewater | Solid Waste | Alternatives | Other Environmental Considerations | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **14. Los Angeles Conservancy,** Jay Platt, Preservation Advocate, 523 W. Sixth Street, Suite 826, Los Angeles, CA 90014, August 2, 2006. | | | | | X | | | | | | | | | | | | | | | |
| **15. Music Center,** Stephen D. Rountree, President, 135 N. Grand Avenue, Los Angeles, CA 90012, July 13, 2006. | | | X | | | | | X | | | | | | | | | | | | |
| **Individuals** | | | | | | | | | | | | | | | | | | | | |
| **16. Joyce Dillard,** P.O. Box 31377 Los Angeles, CA 90031, , August, 3, 2006. | | | | | X | | | | X | | | | X | | X | | | | | X |
| **17. Steve Hartman,** 444 Longridge Avenue, Sherman Oaks, CA 91423, July 19, 2006. | | | | | | | | | | | | | | | | | | | | X |
| **Oral Comments Provided at the July 18, 2006 Public Meeting** | | | | | | | | | | | | | | | | | | | | |
| **1. Joseph Thomas** | | | X | | | X | | | | | | | | | | | | | | |
| **2. Deborah Burton** | | | | | | | | | | X | | | | | | | | | | |
| **3. Linda Valverde** | | | | | | | X | | | | | | | | | | | | | |
| **4. General Dogon** | | | | | | | | | | | X | | X | | | | | | | |

| SUMMARY OF COMMENTS<br><br>GRAND AVENUE PROJECT<br>DRAFT EIR | Project Description | Land Use | Traffic, Circulation & Parking | Aesthetics & Visual Resources | Historical Resources | Population, Housing & Employment | Air Quality | Noise | Hazards and Hazardous Materials | Fire Services | Police Services | Schools | Parks & Recreation | Libraries | Water Supply | Wastewater | Solid Waste | Alternatives | Other Environmental Considerations | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **5. Roberto Carbajal** | | | | | | X | | | | | | | | | | | | | | |
| **6. Samuel Sanchez** | | | | | | | X | | | | | | X | | | | | | | |
| **7. Sister Diane Donaghue** | | | X | | | X | | | | | | | | | | | | | | |
| **8. Gilda Haas** | | | X | | | X | | | | | | | | | | | | | | |
| **9. Alberto Tlatoa** | | | X | | | X | | | | | | | | | | | | | | |
| **10. Russell Brown** | | X | X | | | X | | | | | | | X | | | | | | | |
| **11. Ben Beach** | | | | | | | X | | | | | | | | | | | | | X |
| **12. Esther Alejandro** | | | X | | | X | X | | | | | | | | | | | | | |
| **13. Benjamin Torres** | | X | | | | X | | | | | | | | | | | | | | |
| **Public Meeting Comment Form** | | | | | | | | | | | | | | | | | | | | |
| **1. Montebello Bus Lines,** Tay Chor | | | X | | | | | | | | | | | | | | | | | |

# III. Mitigation Monitoring Program

# III. MITIGATION MONITORING PROGRAM

## A. INTRODUCTION

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." Section 15097 of the CEQA Guidelines (Mitigation Monitoring or Reporting) provides additional direction on mitigation monitoring and reporting. The Grand Avenue Authority (the "Authority") is the Lead Agency for the proposed Project.

An EIR has been prepared to address the potential environmental impacts of the proposed Project. Where appropriate, the EIR includes recommended mitigation measures to avoid or substantially lessen the significant environmental impacts associated with the proposed Project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of these measures that would reduce Project impacts that are expressly identified as "Mitigation Measures." As defined in the Draft EIR, ""a CEQA Mitigation Measure is a measure that would lessen an otherwise significant Project impact, (ii) a Regulatory Measure is a measure imposed by applicable law, rule, regulation or standard agency practice for a Project impact deemed herein to be less than significant, and (iii) a Project Design Measure is a measure proposed by the developer as a feature of the Project that would lessen a Project impact deemed herein to be less than significant." While Regulatory Measures and Project Design Features for the Project are identified in the Final EIR, this MMP addresses only CEQA Mitigation Measures as required by the applicable provisions of CEQA.

As shown on the following pages, each required mitigation measure for the proposed Project is listed and categorized by impact area, with accompanying discussion of:

- Monitoring Phase, the phase of the project during which the mitigation measure shall be monitored:
    - Pre-Construction, including the design phase.
    - Construction.
    - Occupancy (post-construction).
- The Enforcement Agency, the agency with the power to enforce the mitigation measure.
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The MMP for the proposed Project will be in place throughout all phases of the project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation

measure itself. The entity responsible for implementing the mitigation measure shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

The substance and timing of each certification report that is submitted to the Authority shall be at the discretion of the Authority. Generally, each report will be submitted to the Authority in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The Authority, in conjunction with the entity responsible for implementing the mitigation measure, shall assure that Project construction occurs in accordance with the MMP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation.

## B. MITIGATION MEASURES

### 1. Land Use

No mitigation measures are identified in the EIR for this environmental issue.

### 2. Traffic/Circulation and Parking

**Mitigation Measure B-1**: The Developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, prior to the start of each construction work phase, a Construction Traffic Control/Management Plan to be approved by the LADOT and implemented by the responsible party. The Plan shall include, but not be limited to, Project scheduling, the location and timing of any temporary lane closures, traffic detours, haul routes, temporary roadway striping, and signage for traffic flow, as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project, if necessary. The Plan should also provide for the coordination of construction areas, and for safe pedestrian movement throughout the Project Area such that adequate and safe pedestrian movement access is maintained to adjacent uses including the Walt Disney Concert Hall, the Music Center, the County Courthouse, and the Metro Red Line station portals (on Parcel W-2 and on the Court of Flags).

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to issuance of building permits for that phase; Construction

**Enforcement Agency**: Los Angeles City Department of Transportation

**Monitoring Agency**: Los Angeles City Department of Transportation

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure B-2**: After approval of the Construction Traffic Control/Management Plan(s) required under Mitigation Measure B-1 and prior to the start of each construction work phase, the Developer with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall submit a copy of the Plan(s) to the Authority or other appropriate agency, and/or the City Chief Administrative Officer or designee and the County of Los Angeles Chief Administrative Officer. Following receipt of the Plan(s), the County of Los Angeles Chief Administrative Officer or designee shall distribute that information to all County properties on Grand Avenue, including the Hall of Administration, County Courthouse, the Walt Disney Concert Hall, and the Music Center, for further distribution of information to employees and visitors on construction schedules, alternative travel routes, and lane and sidewalk closure information, as appropriate, and the Authority or other appropriate agency, or the City, shall distribute to the appropriate City departments for the same purposes.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to issuance of building permits for that phase; Construction

**Enforcement Agency**: City of Los Angeles CAO or designee /County CAO or its designee

**Monitoring Agency**: City of Los Angeles CAO or designee / County CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure B-3**: Prior to the start of each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall enter into one or more temporary arrangements with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off-street spaces for the construction workers during Project construction, and will require all construction workers to use these designated parking spaces. These temporary arrangements shall be to the satisfaction of CRA/LA and the County's CAO or its designee.

**Responsible Implementation Party**: The Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to issuance of building permits for that phase; Construction

**Enforcement Agency**: CRA/LA and the County's CAO or its designee.

**Monitoring Agency**: CRA/LA and the County's CAO or its designee.

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure B-4**: If the Project proceeds with the County office building option, the County, on an on-going basis following initial occupancy, shall fund and implement a Transportation Demand Management (TDM) program for the proposed County office use in Parcel W-1/W-2. The County's Chief Administrative Officer shall ensure the County's review and approval of this TDM program. The TDM program could, for example, include an onsite transportation coordinator, post information on transit, and provide logistical support for the formation of carpools and vanpools, and other incentives to use transit and rideshare.

**Responsible Implementation Party**: Los Angeles County Chief Administrative Officer

**Monitoring Period**: Operation

**Enforcement Agency**: Los Angeles County CAO or its designee

**Monitoring Agency**: Los Angeles County CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure B-5:** The Developer, with regard to the five development parcels, shall implement ATCS in conjunction with the area-wide ATCS program, if not otherwise implemented, prior to the completion of the first phase of development at the intersections identified by LADOT, although the implementation of this measure will provide mitigation to all three Project phases. Implementation of ATCS shall occur in the northern part of downtown, north of Eighth Street, at the locations identified by LADOT. LADOT has determined that implementation of the ATCS mitigation improvements in the area surrounding the Project would comprise the following: (1) upgrades to Model 2070 traffic signal controllers at 35 intersections; (2) installation of 58 ATSAC/ATCS system vehicle detectors at 9 intersections; and (3) installation of CCTV cameras to provide video information to the ATSAC Center at eight locations. Subject to a final determination by LADOT of the improvements required for the Project, ATCS shall also include LADOT's Transit Priority System (TPS).

**Responsible Implementation Party**: Developer

**Monitoring Period**: Prior to issuance Certificate of Occupancy for Phase I

**Enforcement Agency**: Los Angeles City Department of Transportation

**Monitoring Agency**: Los Angeles City Department of Transportation

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure B-6**: The following menu of mitigation measures has been developed to further reduce the Project's potential traffic and circulation impacts. The term, "menu," refers to the various ways that each of the following measures can be implemented to achieve trip reduction. Selection shall be coordinated with the LADOT, who shall determine which of these mitigation measures are to be implemented.

- Provide enhanced walking connections along the Project street frontages to transit service (to bus stops and to the Red Line station portals at First Street and Hill Street, and at Hill Street mid-block between First Street and Temple Street). These could comprise pedestrian amenities along the Project's street frontages, including landscaped sidewalks, wider crosswalks where feasible at key intersections, improved lighting for pedestrian safety at nighttime, and pedestrian wayfinding signage, to facilitate walking in the Project area. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of these Project components.

- The Developer, as determined by LADOT and prior to initial building occupancy for each development phase shall provide enhanced bus stops on the street frontages of the five development parcels. These enhanced bus stops may include bus shelters with passenger amenities such as benches, shaded areas, and transit information, that could be integrated into the overall urban design/landscaping of the Project.

- Provide transit information kiosks at various strategic locations on the Project site. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall implement these measures prior to the completion of construction for each of those Project components.

- The Developer, with regard to the five development parcels, shall participate to the extent feasible in an on-going basis during Project operations, in a Share-Car program (e.g., Flexcar) that makes cars available to registered members. It is anticipated that up to three on-street parking spaces, subject to a determination of feasibility by LADOT, could be provided at key locations adjacent to the Project frontage for up to three Share-Cars. The Share-Cars could be available to both Project and non-Project users as long as they were members of the Share-Car program. The Project shall support any Share-Car organization's application to the City, and following any implementation of such application shall promote the Share-Car concept and encourage its usage with Project residents and tenants.

- Provide improved vehicular directional signage on surface streets approaching and within the Project area to direct vehicles to specific destinations and parking locations, as appropriate, to minimize vehicles circulating in the Project area. Such signage should be approved to the satisfaction of LADOT. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each development phase; while, the responsible parties for the implementation of the Civic Park under the applicable agreements, shall implement these measures prior to the completion of construction for the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Measures to be implemented with respect to each phase, prior to issuance of a Certificate of Occupancy for the applicable development phase as determined by LADOT, except for Flexcar, which should be implemented during Operation

**Enforcement Agency**: Los Angeles City Department of Transportation

**Monitoring Agency**: Los Angeles City Department of Transportation

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure B-7:** The Developer, with regard to the five development parcels, shall re-stripe the westbound approach of the Third Street and Hill Street intersection from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. This improvement would require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. The final lane configuration of this intersection shall be to the satisfaction of the City of Los Angeles Department of Transportation. In addition, any street widening and construction activities shall be coordinated with the City of Los Angeles Department of Public Works, Bureau of Engineering.

**Responsible Implementation Party**: Developer

**Monitoring Period**: Prior to issuance of Certificate of Occupancy for Phase I

**Enforcement Agency**: City's Department of Public Works, Bureau of Engineering/ City's Department of Transportation

**Monitoring Agency**: City's Department of Public Works, Bureau of Engineering/ City's Department of Transportation

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

## 3. Aesthetics

### a. Construction

**Mitigation Measure C-1:** During Project construction, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials remain posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period. The City's Department of Building and Safety or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to construction of the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**b. Operation**

**Mitigation Measures**

**Mitigation Measure C-2:** Prior to the start of each construction work phase, the Developer, with regard to the five development parcels, shall submit a design plan and technical analysis prepared by the Project's architect as part of the building permit submission that demonstrates that the final selection of building materials for the five development parcels shall not create a significant glare impact on any offsite sensitive uses, including line-of-sight glare on any street or commercial, residential, or cultural use. The approved design plan shall be implemented by the Developer with regard to the five development parcels. The design plan and technical study shall be reviewed and approved by the Authority.

**Responsible Implementation Party:** Developer

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to issuance of building permits for that phase

**Enforcement Agency**: City of Los Angeles Department of Building and Safety

**Monitoring Agency:** City of Los Angeles Department of Building and Safety

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | _____<br>Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | _____<br>Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure C-3:** Prior to each construction phase, the Developer with regard to the five development parcels, shall prepare and, thereafter, implement plans and specifications to ensure that architectural lighting is directed onto the building surfaces and have low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

**Responsible Implementation Party**: Developer

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to issuance of building permits for that phase

**Enforcement Agency**: Los Angeles City Department of Building and Safety

**Monitoring Agency:** Los Angeles City Department of Building and Safety

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**4. Historical Resources**

**Mitigation Measure D-1: Potential Los Angeles Civic Center Historic District.** Prior to the start of each construction phase, the responsible parties for implementation of the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the potential Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following measures:

**Grand Avenue Streetscape Program Design Features.** If the Streetscape Program is implemented in substantial conformance to that set forth in the Project's Conceptual Plan, then the following mitigation measure is not required since such Plan is consistent with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings and the Guidelines for Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then the landscape and hardscape features proposed as part of the Grand Avenue Streetscape Program shall respect the linear qualities of the street and sidewalks in respect to the adjacent historic resource. Such landscape treatments shall be unified and planted in a manner as to not obscure the sight lines to the facades of those properties identified as contributors to the potential Los Angeles Civic Center Historic District from the public right-of-ways. The design of the Project's streetscape improvements shall consider their height, width, and spatial placement and include a program of selective pruning of trees to retain sight lines on a regular basis.

**Responsible Implementation Party**: Responsible parties for implementation of the Streetscape Program

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: City's Department of Building and Safety

**Monitoring Agency:** City's Department of Building and Safety

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-2: Music Center.** No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then prior to the start of each construction phase, the entity responsible for implementing the Project's streetscape program under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potential eligibility of the Music Center are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the streetscape improvements does not materially alter the Music Center's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Streetscape Program

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee/ City's Department of Building and Safety

**Monitoring Agency:** County's CAO or its designee/ City's Department of Building and Safety

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-3: Cathedral of Our Lady of the Angels.** No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, then prior to the start of each construction phase, the entity responsible for implementing the Project's streetscape program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Cathedral of Our Lady of the Angels are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the streetscape improvements does not materially alter the Cathedral of Our Lady of the Angels' potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Streetscape Program

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: City's Department of Public Works

**Monitoring Agency:** City's Department of Public Works

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-4: Kenneth Hahn Hall of Administration.** No mitigation measures are required if the final design for the Civic Park and the Grand Avenue streetscape improvements are in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park and the streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program, under the applicable agreements, shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Kenneth Hahn Hall of Administration as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park and the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final designs for the Civic Park and streetscape improvements do not materially alter the Kenneth Hahn Hall of Administration's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards. The County's CAO or its designee shall determine compliance for the Civic Park, and the City's Department of Building and Safety shall determine compliance for the Streetscape Program.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency:** County's CAO or its designee/ City's Department of Building and Safety

**Monitoring Agency:** County's CAO or its designee/ City's Department of Building and Safety

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-5: Civic Center Mall (El Paseo de los Pobladores de Los Angeles).** Prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Civic Center Mall for listing in the California Register is reduced to the maximum extent practicable. However, in the event that any one or more of the following occurs: (1) the water feature (both the fountain and pools) no longer serves as a focal point for the park; (2) many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in-place or within the reconfigured park preferably near the water feature and adjacent to the civic buildings; (3) the existing elevator shaft structures are removed in their totality, or (4) many of the light poles with saucer-like canopies and the "hi-fi" speaker poles with saucer-like canopies are not retained in-place or relocated adjacent to or integrated along with the water feature, benches, retaining walls, and planter boxes, then the Standards shall be utilized to ensure that rehabilitation work to the four character-defining features of the park referenced in this Mitigation Measure D-5 does not impair the historic characteristics that convey the Civic Center Mall's historical significance as an individual resource and as a contributing property to the potentially eligible Los Angeles Civic Center Historic District. If such compliance with such Standards cannot be achieved, then the following measures shall apply to the applicable character-defining features identified in this Measure:

**Recordation.** Prior to the issuance of a demolition permit for the Civic Center Mall and its associated features, a Historic American Building Survey (HABS) Level II-like recordation document shall be prepared for the Civic Center Mall. A qualified

architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History shall prepare this document. The HABS-like document shall record the existing landscape and hardscape features of the Civic Center Mall, including the four character-defining features identified in this measure. The report shall also document the history and architectural significance of the property and its contextual relationship with the surrounding civic buildings and environment. Its physical composition and condition, both historic and current, should also be noted in the document through the use of site plans, historic maps and photographs, and large-format photographs, newspaper articles, and written text. A sufficient number of large-format photographs shall be taken of the resource to visually capture its historical and architectural significance through general views and detail shots. Field photographs (35mm or digital format) may also be included in the recordation package. All document components and photographs should be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Archival copies of the report, including the original photographs, shall be submitted to the California Office of Historic Preservation and the Huntington Library. Non-archival copies of the report and photographs shall be submitted to the County of Los Angeles, the City of Los Angeles Planning Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy Modern Committee.

**Salvage and Reuse of Key Park Features.** Prior to the removal of the four character-defining features identified in this Measure, a qualified preservation consultant and landscape architect shall make an inventory of significant landscape and hardscape elements. Where feasible, these materials and elements shall be itemized, mapped, photographed, salvaged, and incorporated into the new design of the park, wherever possible. To the extent salvageable materials cannot be reused on-site, they shall be disposed of in accordance with applicable county surplus procedures.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park

**Monitoring Period**: Prior to issuance of building permits.

**Enforcement Agency**: County's CAO or its designee

**Monitoring Agency:** County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-6: Hall of Records.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Hall of Records building as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Hall of Records' potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee

**Monitoring Agency:** County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-7: Court of Flags.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potential eligibility of the Court of Flags as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Court of Flag's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee

**Monitoring Agency:** County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-8: Clara Shortridge Foltz Criminal Justice Center.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Clara Shortridge Foltz Criminal Justice Center as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park does not materially alter the Clara Shortridge Foltz Criminal Justice Center's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee

**Monitoring Agency:** County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-9: Los Angeles City Hall.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to those historic characteristics that make the Los Angeles City Hall building historically significant as a designated resource and as a contributing property to the potentially eligible Los Angeles Civic Center Historic District, are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the historic significance of the Los Angeles City Hall. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards..

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee

**Monitoring Agency:** County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-10: Los Angeles County Law Library.** No mitigation measures are required if the final design for the Civic Park is in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the potentially eligible Los Angeles County Law Library as a contributing property to the Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed Civic Park design does not materially alter the Los Angeles County Law Library's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee

**Monitoring Agency:** County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-11: Los Angeles County Courthouse.** No mitigation measures are required if the final design for the Civic Park and the Grand Avenue streetscape improvements are in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Civic Park and the streetscape improvements not be implemented in substantial conformance with the Project's Conceptual Plan, prior to the start of each construction phase, the responsible parties for implementation of the Civic Park and the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the potential eligibility of the Los Angeles County Courthouse as a contributing property to the potentially eligible Los Angeles Civic Center Historic District are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Civic Park and the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the proposed final designs for the Civic Park and streetscape improvements do not materially alter the Los Angeles County Courthouse's potential historic significance. This evaluation shall be conducted in accordance with the Secretary of the Interior's Standards. The County's CAO or its designee will determine compliance for the Civic Park and the City Department of Building and Safety will determine compliance for the Streetscape Program.

**Responsible Implementation Party**: Responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: County's CAO or its designee/ City's Department of Building and Safety

**Monitoring Agency:** County's CAO or its designee/ City's Department of Building and Safety

| **Documentation of Compliance** |
|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)]<br><br>Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)]<br><br>Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure D-12: Southern California Edison (One Bunker Hill).** No mitigation measures are required if the Grand Avenue streetscape improvements are implemented in substantial conformance to that set forth in the Project's Conceptual Plan, as determined by the Authority, since such Plan is consistent with the Secretary of Interior's Standards of Rehabilitation of Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes (collectively referred to as the "Standards"). However, should the final design for the Grand Avenue streetscape improvements are not implemented in substantial conformance with the Project's Conceptual Plan, the responsible parties for implementation of the Streetscape Program under the applicable agreements shall submit plans to the Authority, for review and approval to ensure that impacts to the historic characteristics that convey the Southern California Edison Building's (One Bunker Hill) significance are reduced to the maximum extent practicable through implementation of the following mitigation measure:

Prior to implementation, the final design plans for the Grand Avenue streetscape improvements shall be reviewed by a qualified architectural historian or historic preservation consultant who satisfies the Secretary of the Interior's Professional Qualification Standards for History or Architectural History to assure that the final design for the proposed streetscape improvements does not materially alter the Southern California Edison (One Bunker Hill) Buildings' historic significance. This evaluation shall be conducted in accordance with Secretary of the Interior's Standards.

**Responsible Implementation Party**: Responsible parties for implementation of the Streetscape Program

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: City's Department of Building and Safety

**Monitoring Agency:** City's Department of Building and Safety

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

## 5. Population, Housing and Employment

No mitigation measures are identified in the EIR for this environmental issue.

## 6. Air Quality

**Mitigation Measure F-1:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.[1] The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with SCAQMD Rule 403 during construction with regard to construction associated with the five development parcels and the Grand Avenue Streetscape Program. The County's CAO or its designee shall determine compliance with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance. Compliance with the applicable provisions of Rule 403 shall include, but not be limited to, using best available control measures listed in Table 1 of Rule 403 to minimize fugitive dust emissions from each fugitive dust source type within active operations, and will include at least the following specific best management practices (BMPs):

- Water soils daily and not more than 15 minutes prior to earth moving activities;
- Water surfaces two times per day or more in order to maintain a surface crust to prevent soil erosion;
- Apply soil conditioners or vegetative cover to areas that will be exposed for an extended duration;

[1] *SCAQMD Rule 403 requirements are detailed in Appendix D.*

- Apply chemical stabilizers within five working days of ceasing grading;
- Install approved trackout prevention devices and provide street sweeping within the Project area;
- Securely cover truck loads with a tarp;
- Cease grading activities when wind speeds exceed 25 miles per hour; and
- Permanently seal exposed surfaces as soon as possible after grading is finished.
- Provide temporary wind fencing, consisting of wrapped chain link or solid fencing, around the sites that are being graded/excavated to reduce dirt/dust from being blown over to adjoining properties.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: SCAQMD

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-2:** During each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance

with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: SCAQMD

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-3:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall comply with SCAQMD Rule 402 to reduce potential nuisance impacts due to odors from construction activities. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: SCAQMD

**Monitoring Agency:** City's Los Angeles Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-4:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all haul truck tires shall be cleaned at the time these vehicles exit the Project site. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: SCAQMD

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-5:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all export material carried by haul trucks shall be covered by a tarp or other means. The City's Department of Building and Safety, or other appropriate City agency or department, shall provide oversight with regard to compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall provide oversight with regard to compliance with this measure with regard to the Civic Park. The SCAQMD retains jurisdiction to enforce this measure in the case of noncompliance.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: SCAQMD

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-6:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
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| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-7:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that construction equipment is maintained and operated so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn off their engines, when not in use, to reduce vehicle emissions. Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction activities associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
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| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-8:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that electricity rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-9:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-10:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that heavy-duty construction equipment shall use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
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| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-11:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that shuttle service shall be provided to construction workers who are required to park in offsite parking lots, if such lots are not within a walking distance of 1,100 feet from the respective construction sites. The CRA/LA shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: CRA/LA and County's CAO or its designee

**Monitoring Agency:** CRA/LA and County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-12:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall equip major earth moving equipment, haul trucks, and excavation equipment with particulate filters and catalytic converters. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

## Operation

### Transportation System Management and Demand Management

**Mitigation Measure F-13:** During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park under the applicable agreements shall, to the extent feasible, ensure that deliveries are scheduled during off-peak traffic periods to encourage the reduction of trips during the most congested periods. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure, with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Operation

**Enforcement Agencies**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agencies:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-14:** During Project operations, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall coordinate with the MTA and the City of Los Angeles Department of Transportation to provide information to Project employees, residents and guests with regard to local bus and rail services. .

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for

implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Operation

**Enforcement Agencies**: City's Department of Transportation its designee

**Monitoring Agencies:** City's Department of Transportation

| **Documentation of Compliance** | |
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| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-15:** Provide the appropriate number of bicycle racks located at convenient locations in the Project site. The Developer shall implement this measure with regard to the five development parcels prior to initial building occupancy for each construction phase, while the responsible parties for the implementation of the Civic Park, under the applicable agreements, shall implement these measures prior to the completion of each construction phase. The City's Department of Building and Safety shall review and approve the number and location of the bicycle racks with regard to the five development parcels. The County's CAO or its designee shall perform the same function with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to the issuance of the Certificate of Occupancy for that phase

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure F-16:** During on-going Project operations, The Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park, under the applicable agreements, shall ensure that all fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed, but a minimum level of lighting should be provided for safety. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this mitigation measure with regard to the five development parcels. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: This measure to be implemented with respect to each phase, prior to the issuance of the Certificate of Occupancy for that phase

**Enforcement Agency**: City's Department of Building and Safety/County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

## 7. Noise

**Mitigation Measure G-1:** To reduce any impact on nearby venues that may be noise sensitive receptors, such as the Music Center, Walt Disney Concert Hall, and the County Courthouse, the following Measures G-1 and G-2 shall be implemented as follows: During each construction phase, The Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall limit (i) construction activities utilizing heavy equipment to Monday through Friday from 7:00 A.M. to 8:00 P.M., and (ii) interior construction work inside building shells and construction activities not utilizing heavy equipment to 7:00 A.M. to 9:00 P.M. Monday through Friday. Saturday construction shall be limited to 8:00 A.M. to 6:00 P.M. No exterior construction activities shall be permitted on Sundays or holidays per applicable City regulations. Construction noise measures shall also be implemented, which may include the use of noise mufflers on construction equipment used within 100 feet of these buildings. The City's Department of Building and Safety or other appropriate City agency or department shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-2:** During each construction phase, the Developer, with regard to the five development parcels and the responsible parties for implementation of Civic Park and the Streetscape Program shall not use heavy equipment within (to the maximum extent practicable) 100 feet of the County Courthouse building while Court is in session. Construction contracts must specify that all construction equipment shall be in proper operating condition and fitted with standard factory silencing features and other applicable attenuation devices such as mufflers. The City's Department of Building and Safety or other appropriate city agency or department shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-3:** During the initial stage of each construction phase (site demolition and site preparation/excavation) for each Project parcel and when construction activities are within 200 feet of noise sensitive land uses, the Developer, with regard to the five development parcels, shall erect a temporary, 8-foot, ½-inch-thick plywood fence along the boundaries of each construction site adjacent to noise sensitive uses such that the "line of sight" between on-site construction activities and the residential or other sensitive uses is blocked, where feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels.

**Responsible Implementation Party**: The Developer with regard to the five development parcels

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety

**Monitoring Agency:** City's Department of Building and Safety

| **Documentation of Compliance** | |
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| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-4:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that pile drivers within the individual activity/development site under construction at that time shall be equipped with noise control devices having a minimum quieting factor of 10 dBA. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** |
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| Plans and Specifications<br>[Title of Monitoring Report(s)]<br><br>Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)]<br><br>Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-5:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall, except as otherwise permitted by applicable agreements, ensure that construction loading and staging areas shall be located on the Project site within each respective construction site and away from noise-sensitive uses to the extent feasible. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction in the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's of Department of Building and Safety/ County's CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-6:** Prior to the issuance of grading permits for each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall prepare, and thereafter implement, plans and specifications that include a requirement to route pedestrians (to the maximum extent practicable) 50 feet away from the construction area when heavy equipment such as hydraulic excavators is in use. Such routing may include the posting of signs at adjacent intersections. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Prior to issuance of building permits/Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City of Los Angeles Department of Building and Safety/ County CAO or its designee

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-7:** During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, shall designate a construction relations officer to serve as a liaison with surrounding property owners who is responsible for responding to any concerns regarding construction noise. The liaison shall coordinate with the Project construction manager(s) to implement remedial measures in the shortest time feasible. The liaison's telephone number(s) shall be prominently displayed at multiple locations along the perimeter of each construction site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Responsible Implementation Party**: The Developer with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program

**Monitoring Period**: Construction

**Enforcement Agency**: City's Department of Building and Safety/ County's CAO or its designee

**Monitoring Agency:** City's Department of Building and Safety/ County's CAO or its designee

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

**Mitigation Measure G-8:** The Developer, with regard to the five development parcels, shall prepare and implement building plans that ensure prior to the start of each construction phase which includes residential development that all exterior walls, floor-ceiling assemblies (unless within a unit), and windows having a line of sight (30 degrees measured from the horizontal plane) of Grand Avenue, Hill Street, Hope Street, First Street, and Second Street of such residential development shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a lab-tested Sound Transmission Class of 30, subject to field testing, as defined in the UBC Standard No. 35-1, 1982 edition. Sign-off by the City's Department of Building and Safety, or other appropriate City

agency or department, shall be required prior to obtaining a building permit. The Developer, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City's Department of Building and Safety, or other appropriate City agency or department. Examples of alternative means may include, but are not limited to, the following: (1) acoustical seals for doors and windows opening to the exterior; (2) consideration of the type, location, and size of windows; and (3) sealing or baffling of openings and vents. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

**Responsible Implementation Party**: The Developer with regard to the five development parcels

**Monitoring Period**: Operation

**Enforcement Agency**: City's Department of Building and Safety

**Monitoring Agency:** City's Department of Building and Safety

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | |
| | Signatures/Dates of Monitoring Agent(s) |

## 8. Hazards

No mitigation measures are identified in the EIR for this environmental issue.

## 9. Fire Services

No mitigation measures are identified in the EIR for this environmental issue.

## 10. Police

No mitigation measures are identified in the EIR for this environmental issue.

## 11. Schools

**Mitigation Measure I.3-1:** Prior to the issuance of each building permit, the Developer, with regard to the five development parcels, shall pay school mitigation fees pursuant to the provisions of California Government Code Section 65995. The City's Department of Building and Safety, or other appropriate City agency or department shall determine compliance with this measure.

**Responsible Implementation Party**: Developer

**Monitoring Period**: Prior to issuance of building permits

**Enforcement Agency**: City's Department of Building and Safety

**Monitoring Agency:** City's Department of Building and Safety

| **Documentation of Compliance** | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | _____<br>Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | _____<br>Signatures/Dates of Monitoring Agent(s) |

## 12. Parks and Recreation

**Mitigation Measure I.4-1:** Prior to the issuance of a certificate of occupancy, the Developer, with regard to the five development parcels, shall: (1) dedicate additional parkland such that the Project would provide a total of 3 acres per 1,000 Project residents; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) a combination of the above. The City's Department of Building and Safety, or other appropriate City agency or department shall determine compliance with this measure.

**Responsible Implementation Party**: Developer

**Monitoring Period**: Prior to issuance of certificate of occupancies

**Enforcement Agency**: City's Department of Building and Safety

**Monitoring Agency:** City's Department of Building and Safety

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

## 13. Libraries

No mitigation measures are identified in the EIR for this environmental issue.

## 14. Water Supply

**Mitigation Measure J.1-1:** Prior to initial occupancy of the buildings within Parcels L and W-1/W-2, the Developer shall install new water lines along Second Street, from Olive Street to Hill Street to serve Parcels W-1/W-2, and from Hope Street to Lower Grand Avenue to serve Parcel L. The City's Department of Public Works shall review and approve all plans related to these new water lines. The Developer shall be responsible for the implementation of these improvements.

**Responsible Implementation Party**: Developer

**Monitoring Period**: Prior to issuance of a building permit

**Enforcement Agency**: City's Department of Public Works

**Monitoring Agency:** City's Department of Public Works

| Documentation of Compliance | |
|---|---|
| Plans and Specifications<br>[Title of Monitoring Report(s)] | Signatures/Dates of Monitoring Agent(s) |
| Construction Briefing<br>[Title of Monitoring Agent(s)] | Signatures/Dates of Monitoring Agent(s) |

### 15. Wastewater

No mitigation measures are identified in the EIR for this environmental issue.

### 16. Solid Waste

No mitigation measures are identified in the EIR for this environmental issue.

# IV. Corrections and Additions

# IV. CORRECTIONS AND ADDITIONS

The following corrections and additions are set forth to update the Grand Avenue Project Draft Environmental Impact Report (Draft EIR) in response to the comments received during and after the public review period. Changes to the Draft EIR are listed by the corresponding Draft EIR Section, subsection, if applicable, and then page number. Corrections and additions to the Draft EIR derive either from public and agency comments or from the recognition of an error by the Authority that had been overlooked in the Draft EIR. In cases where a correction or comment resulted in a change to the Draft EIR, changes are presented in this section. It is important to note that the corrections and additions to the Draft EIR did not result in any increased environmental effects that would alter or modify the conclusions of significance contained in the Draft EIR. Therefore, corrections and additions to the Draft EIR did not result in any significant impacts that were not already identified in the Draft EIR.

**Section I. SUMMARY**

Section I. of the Draft EIR has been updated and is provided in its entirety in Section II of this Final EIR. This Final EIR Summary supersedes the Draft EIR Summary.

**Section II. PROJECT DESCRIPTION**

a. Volume 1, Section II. Project Description, page 116, paragraph 1, second line. Replace "1.1.14 million square feet" with "1,231,937 square feet."

**Section III.A. OVERVIEW OF ENVIRONMENTAL SETTING**

There are no corrections and additions to this section of the Draft EIR.

**Section III.B. CUMULATIVE DEVELOPMENT**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.A. LAND USE AND PLANNING**

a. Volume 1, Section IV.A. Land Use, page 168. Add the following subsection and paragraph:

**(3) State of California Programs**

**(a) California Endangered Species Act (Fish and Game Code Section 2500 et. seq.)**

The California Department of Fish and Game is the trustee agency with jurisdiction over natural resources that come under the purview of the California Endangered Species Act (CESA). CESA

states that all species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered species designation, will be protected or preserved. CESA also implements the federal Endangered Species Act and the federal Migratory Bird Treaty Act (MBTA), first enacted in 1916. Migratory non-game native birds are protected by international treaty and include all birds, listed in the implementing regulations under Title 50, CFR, Parts 10, 20 and 21, including raptors and other migratory non-game birds, and their active nests. Urban landscaping, consisting of mature trees and shrubbery, currently characterizes the existing Civic Center Mall, and potentially could serve as habitat for stopover sites and nesting habitat for non-game migratory birds. The five development sites are fully paved and almost entirely devoid of landscaping features. Unlike the Civic Center Mall, these sites are highly unlikely to provide nesting opportunities for migrating non-game birds and raptors.

b. Volume 1, Section IV.A. Land Use, page 206. Add the following subsection and paragraph:

**(m) California Endangered Species Act** (Fish and Game Code Section 2500 et. seq.) The mature trees and landscaping in the existing Civic Center Mall have the potential to serve as habitat for stopover sites and nesting habitat for non-game migratory birds. Proposed construction activities within the Civic Center Mall, which would include potential disturbance of native and non-native vegetation, structures, and substrates, have the potential to disturb migratory birds during their breeding season, which generally runs from March 1 through August 31, and as early as February 1 for raptors. To avoid a "take,"[1] under the MBTA, which includes disturbances that would cause the abandonment of active nests containing eggs and/or young, protective measures are recommended to document compliance with applicable state and federal laws pertaining to the protection of native birds.

c. Volume 1, Section IV.A. Land Use, page 206, subsection 5. Regulatory Measures. Add the following regulatory measure: Regulatory Measure A-1: Project construction involving of on-site clearance of vegetation, excavation, or other construction activities shall avoid, to the extent feasible, from occurring between March 1 and August 31 (and between February 1 and August 31 for raptors). Prior to the completion of final plans and specifications for the Civic Park, the County Chief Administrative Officer (CAO) or designee shall review the plans and specifications to ensure that the contractor is apprised of the requirements of the Migratory Bird Treaty Act (MBTA) and encouraged to schedule removal or relocation of mature trees and removal of other potential nesting habitat outside of the breeding season. In the event that the identified construction activities must occur within the specified time period, a qualified biologist acceptable to the County Chief Administrative Officer shall complete weekly surveys within the

[1] *"Take," refers to the hunting, pursuing, capture, or killing of migratory birds (Fish and Game Code Section 86).*

Civic Park site that is subject to disturbance, and within 500 feet of the boundary of such areas, to determine if any protected native birds are present. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If an active nest is located within trees or other habitat scheduled for removal or relocation, or within 300 feet of the construction area, construction shall be suspended within 300 feet of the nest (500 feet for raptor nests) until such time a qualified biologist determines if construction activities are interfering with nesting activities. If construction activities are determined to not interfere with nesting activities, construction may continue with a biological monitor present. Should a tree or other habitat scheduled for removal or relocation be determined to contain an active nest, removal or relocation shall be delayed until the nest is determined to be inactive or a permit is granted by the USFWS for take pursuant to the MBTA.

The distance limits of construction to avoid a nest shall be identified in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area. The County CAO or designee shall record the results of the protective measure above.

**Section IV.B. TRAFFIC AND CIRCULATION**

a. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 241, Table 15, under Residential – 2 Bdrm, replace "1 space per DU," with 1.25 spaces per DU."

b. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 286, second paragraph, third sentence. Replace the third sentence with the following:

"The peak direction total of 661 trips would represent about 3.0 percent of the 21,915 person trip transit capacity directly serving the Project area, and about 1.9 percent of the total 34, 780 person trip transit capacity serving the Bunker Hill/Civic Center area, including all rail service."

c. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 286, fourth paragraph third sentence. Replace the third sentence with the following:

"The peak direction total of 200 trips would represent about 0.9 percent of the 21,915 person trip transit capacity directly serving the Project area, and about 0.6 percent of the total 34,780 person trip transit capacity serving the Bunker Hill/Civic Center area (including all rail service)."

d. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 290, replace Table 29 with that shown on the following page.

e. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 291, first paragraph, first sentence. Replace the sentence with the following:

"As shown in Table 29, the Project would provide 1,505 excess spaces compared to the requirements of the Municipal Code and 371 spaces less than the requirements of the Deputy Advisory Agency Residential Policy (DAARP)."

f. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 291, third paragraph, third and fourth sentences. Replace the sentences with the following:

"The Municipal Code would require 545 residential parking spaces for Parcel Q. The Project would provide 755 residential spaces, which would be 210 more than the code requirement."

g. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 291, fourth paragraph, following the second sentence. Add the following:

"The Municipal Code would require 774 residential parking spaces for Parcels W-1/W-2, which would be 296 less than the residential parking provided."

h. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 292, first paragraph, first complete sentence. Replace the sentence with the following:

"The Municipal Code would require 926 residential parking spaces for Parcels L/M-2, which would be 354 less than the residential parking provided."

i. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 292, third paragraph, first sentence. Replace the sentence with the following:

"The proposed Project would provide 3,105 residential parking spaces compared to a code requirement of 2,245 spaces."

j. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 293, second paragraph, third sentence. Replace the sentence with the following:

**Table 29 (Revised)**

**Project with County Office Building Option**
**Summary of Parking Requirements and Proposed Parking Supply**

| Land Use | Parcel Q | | | Parcels W-1/W-2 | | | Parcel L / M-2 | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parking Required | Parking Provided | Diff. | Parking Required | Parking Provided | Diff. | Parking Required | Parking Provided | Diff. | Parking Required | Parking Provided | Diff. |
| **As Per City Code Parking Requirement and CDP Advisory Agency AA-2000-1** [a] | | | | | | | | | | | | |
| Residential | 1,000 | 755 | -245 | 1,421 | 1,070 | -351 | 1,700 | 1,280 | -420 | 4,121 | 3,105 | -1,016 |
| Commercial | 429 | 755 | 326 | 755 | 885 | 130 | 101 | 290 | 189 | 1,285 | 1,930 | 645 |
| Total | 1,429 | 1,510 | 81 | 2,176 | 1,955 | -221 | 1,801 | 1,570 | -231 | 5,406 | 5,035 | -371 |
| **As Per City Code Parking Requirement** [b] | | | | | | | | | | | | |
| Residential | 545 | 755 | 210 | 774 | 1,070 | 296 | 926 | 1,280 | 354 | 2,245 | 3,105 | 860 |
| Commercial | 429 | 755 | 326 | 755 | 885 | 130 | 101 | 290 | 189 | 1,285 | 1,930 | 645 |
| Total | 974 | 1,510 | 536 | 1,529 | 1,955 | 426 | 1,027 | 1,570 | 543 | 3,530 | 5,035 | 1,505 |

[a] *Table A-1 Grand Avenue Implementation Plan - City Code Parking Requirement and CDP Advisory Agency AA-2000-1*
[b] *Table A-2 Grand Avenue Implementation Plan - City Code Parking Requirement*

*Source: The Mobility Group, 2006*

"The proposed Project would provide 3,105 residential parking spaces compared to a code requirement of 2,245 spaces."

k. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 305, third paragraph. Replace the paragraph with the following:

"For Parcel W-1/W-2, the Municipal Code would require 1,428 residential parking spaces. The Project proposes to provide 1,971 residential spaces, which would be 543 more than the Municipal Code requirement."

l. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 305, fifth paragraph. Replace the paragraph with the following:

"Overall the Municipal Code would require a total of 3,503 spaces be provided by the Project with Additional Residential Development Option. The Project with Additional Residential Development Option would provide 5,255 spaces, which would be 1,752 spaces more than the overall code requirement. The Project would provide both more residential and more commercial parking supply than required by code."

m. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 306, replace Table 35 with that shown on the following page.

n. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 307, first paragraph. Replace the first sentence with the following:

"In total, the Municipal Code would require 2,899 residential parking spaces. The Project proposes to provide 4,006 residential spaces, which would be 1,107 more than the code requirement."

o. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 311, insert the following paragraph after the fourth full paragraph:

"A minor change in the Project's parking arrangements for this first phase of development has been proposed by the Developer since publication of the Draft EIR. This change would cause up to 227 parking spaces to be provided off-site up to two blocks from the Project site. However, there would be no significant parking impacts associated with this parking strategy. During evenings and weekends, there are sufficient spaces available in the Civic Center/Bunker Hill area as office buildings are closed. During the daytime, the most likely location would be sufficient spaces in the Walt Disney Hall Concert Hall garage where sufficient spaces would be available, even with the relocation of existing spaces from Parcel Q and Parcel W-1/W-2 due to the Project. Further, because these spaces would be provided within one or two blocks of Parcel Q, and because they would represent only 4% percent of the total Project parking supply, it is not expected that the distribution patterns of Project traffic would be significantly different from the patterns analyzed in the Final EIR.

**Table 35 (Revised)**

**Project with Additional Residential Development Option**
**Summary of Parking Requirements and Proposed Parking Supply**

| | Parcel Q | | | Parcels W-1/W-2 | | | Parcel L / M-2 | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | Parking Required | Parking Provided | Diff. | Parking Required | Parking Provided | Diff. | Parking Required | Parking Provided | Diff. | Parking Required | Parking Provided | Diff. |
| **As Per City Code Parking Requirement and CDP Advisory Agency AA-2000-1** [a] | | | | | | | | | | | | |
| Residential | 1,000 | 755 | -245 | 2,621 | 1,971 | -650 | 1,700 | 1,280 | -420 | 5,321 | 4,006 | -1,315 |
| Commercial | 429 | 755 | 326 | 74 | 204 | 130 | 101 | 290 | 189 | 604 | 1,249 | 645 |
| Total | 1,429 | 1,510 | 81 | 2,695 | 2,175 | -520 | 1,801 | 1,570 | -231 | 5,925 | 5,255 | -670 |
| **As Per City Code Parking Requirement** [b] | | | | | | | | | | | | |
| Residential | 545 | 755 | 210 | 1,428 | 1,971 | 543 | 926 | 1,280 | 354 | 2,899 | 4,006 | 1, 107 |
| Commercial | 429 | 755 | 326 | 74 | 204 | 130 | 101 | 290 | 189 | 604 | 1,249 | 645 |
| Total | 974 | 1,510 | 536 | 1,502 | 2,175 | 673 | 1,027 | 1,570 | 543 | 3,503 | 5,255 | 1,752 |

[a] *Table A-1 Grand Avenue Implementation Plan - City Code Parking Requirement and CDP Advisory Agency AA-2000-1*
[b] *Table A-2 Grand Avenue Implementation Plan - City Code Parking Requirement*

*Source: The Mobility Group, 2006*

Accordingly, this minor change in the Project will would not cause a significant new environmental impact."

o. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 318-319, Mitigation Measure B-5. Replace Mitigation Measure B-5 with the following:

"**Mitigation Measure B-5**: Related, with regard to the five development parcels, shall implement ATCS in conjunction with the area-wide ATCS program, if not otherwise implemented, prior to the completion of the first phase of development at the intersections identified by LADOT, although the implementation of this measure will provide mitigation to all three Project phases. Implementation of ATCS shall occur in the northern part of downtown, north of Eighth Street, at the locations identified by LADOT. LADOT has determined that implementation of the ATCS mitigation improvements in the area surrounding the Project would comprise the following: (1) upgrades to Model 2070 traffic signal controllers at 35 intersections; (2) installation of 58 ATSAC/ATCS system vehicle detectors at 9 intersections; and (3) installation of CCTV cameras to provide video information to the ATSAC Center at eight locations. Subject to a final determination by LADOT of the improvements required for the Project, ATCS shall also include LADOT's Transit Priority System (TPS)."

p. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 319, Mitigation Measure B-6, first paragraph, second sentence. Replace the second sentence with the following:

"The term, "menu," refers to the various ways that each of the following measures can be implemented to achieve trip reduction. Selection shall be coordinated with LADOT, who shall determine which of these mitigation measures are to be implemented."

q Volume 1, Section IV.B. Traffic, Circulation and Parking, page 320. Add the following Mitigation Measure.

"**Mitigation Measure B-7:** The Developer, with regard to the five development parcels, shall re-stripe the westbound approach of the Third Street and Hill Street intersection from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. This improvement would require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. The final lane configuration of this intersection shall be to the satisfaction of the City of Los Angeles Department of Transportation. In addition, any street widening and construction

activities shall be coordinated with the City of Los Angeles Department of Public Works, Bureau of Engineering."

r. Volume 1, Section IV.B. Traffic, Circulation and Parking, page 322, second paragraph (with bullet list). Replace the paragraph with the following paragraph and bullet list:

"As shown in Table 38, one significant unavoidable impact in the A.M. peak hour and 12 significant unavoidable impacts in the P.M. peak hour, would occur at the following locations:

A.M. Peak Hour

- Broadway / First Street (LOS D)

P.M. Peak Hour

- Olive Street / First Street (LOS C)
- Olive Street / Fourth Street (LOS C)
- Hope Street / First Street (LOS D)
- Hope Street / GTK Way /Second Place (LOS D)
- Grand Avenue / Temple Street (LOS D)
- Grand Avenue / First Street (LOS D)
- Olive Street / Fifth Street (LOS D)
- Hill Street / Second Street (LOS D)
- Hill Street / Fourth Street (LOS D)
- Hope Street / Temple St. (US-101 Ramps) (LOS E)
- Broadway / First Street (LOS E)
- Grand Avenue / US-101 / I-110 Ramps (LOS F)

s. Volume 1, Section IV.B. Traffic, Circulation and Parking, Table 38, page 323. Replace Table 38, with that shown on the following pages.

## IV.C AESTHETICS/VISUAL RESOURCES

There are no corrections and additions to this section of the Draft EIR.

## IV.D HISTORICAL RESOURCES

There are no corrections and additions to this section of the Draft EIR.

## IV.E POPULATION, HOUSING, EMPLOYMENT

There are no corrections and additions to this section of the Draft EIR.

## IV.F AIR QUALITY

a. Volume 2, Section IV.F. Air Quality, page 535, Table 57, Footnote a. Replace the second sentence with the following:

"Calculation worksheets for construction activities (e.g., equipment used for each phase, horsepower, and load factor for each piece of equipment) and emission calculations are contained in Appendix D-1 of the Draft EIR."

b. Volume 2, Section IV.F. Air Quality, page 560, Mitigation Measure F-1. Add the following to the end of bulleted text:

"Provide temporary wind fencing, consisting of wrapped chain link or solid fencing, around the sites that are being graded/excavated to reduce dirt/dust from being blown over to adjoining properties."

c. Volume 2, Section IV.F. Air Quality, page 562, Mitigation Measure F-9. Replace the first sentence with the following:

"During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site".

d. Volume 2, Section IV.F, Air Quality, page 563, following mitigation No. F-10. Add the following new mitigation measure:

**Table 38 (Revised)**

**Traffic Impacts with the Implementation of Trip Reduction and ATCS Mitigation – Project with County Office Building Option**

| | | Future Without Project Conditions | | Future With Project Conditions | | | | Future With Project with Mitigation Conditions | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | Change in V/C | Significant Impact | V/C | LOS | Change in V/C | Significant Impact | Mitigates Impact |
| **A.** | **A.M Peak Hour** | | | | | | | | | | | |
| 1 | Figueroa St. / Third St. | 0.827 | D | 0.837 | D | 0.010 | No | 0.814 | D | -0.013 | No | |
| 2 | Figueroa St. / Fifth St. | 0.487 | A | 0.492 | A | 0.005 | No | 0.479 | A | -0.008 | No | |
| 3 | Figueroa St. / Sixth St. | 0.626 | B | 0.632 | B | 0.006 | No | 0.614 | B | -0.012 | No | |
| 4 | I-110 Off Ramp / Temple St. | 0.398 | A | 0.400 | A | 0.002 | No | 0.389 | A | -0.009 | No | |
| 5 | Hope St. / Temple St. / US-101 Ramps | 0.902 | E | 0.921 | E | 0.019 | Yes | 0.895 | D | -0.007 | No | Full |
| 6 | Hope St. / First St. | 0.925 | E | 0.935 | E | 0.010 | Yes | 0.910 | E | -0.015 | No | Full |
| 7 | Hope St. / GTK Way / Second Place | 0.420 | A | 0.452 | A | 0.032 | No | 0.440 | A | 0.020 | No | |
| 8 | Flower St. / Third St. | 0.671 | B | 0.678 | B | 0.007 | No | 0.660 | B | -0.011 | No | |
| 9 | Flower St. / Fifth St. | 0.439 | A | 0.448 | A | 0.009 | No | 0.435 | A | -0.004 | No | |
| 10 | Flower St. / Sixth St. | 0.528 | A | 0.540 | A | 0.012 | No | 0.525 | A | -0.003 | No | |
| 11 | Grand Ave. / US-101 Ramps / I-110 Ramps | 0.693 | B | 0.724 | C | 0.031 | No | 0.703 | C | 0.010 | No | |
| 12 | Grand Ave. / Temple St. | 0.930 | E | 0.929 | E | -0.001 | No | 0.903 | E | -0.027 | No | |
| 13 | Grand Ave. / First St. | 0.791 | C | 0.818 | D | 0.027 | Yes | 0.795 | C | 0.004 | No | Full |
| 14 | Grand Ave. / Upper Second St. | 0.537 | A | 0.670 | B | 0.133 | No | 0.651 | B | 0.114 | No | |
| 15 | Grand Ave. / Fifth St. | 0.487 | A | 0.502 | A | 0.015 | No | 0.489 | A | 0.002 | No | |
| 16 | Olive St. / First St. | 0.531 | A | 0.609 | B | 0.078 | No | 0.590 | A | 0.059 | No | |
| 17 | Olive St. / Second St. | 0.283 | A | 0.359 | A | 0.076 | No | 0.351 | A | 0.068 | No | |
| 18 | Olive St. / Fourth St. | 0.437 | A | 0.548 | A | 0.111 | No | 0.523 | A | 0.086 | No | |
| 19 | Olive St. / Fifth St. | 0.623 | B | 0.654 | B | 0.031 | No | 0.636 | B | 0.013 | No | |
| 20 | Olive St. / Sixth St. | 0.402 | A | 0.424 | A | 0.022 | No | 0.410 | A | 0.008 | No | |
| 21 | Hill St. / Temple St. | 0.762 | C | 0.815 | D | 0.053 | Yes | 0.792 | C | 0.030 | No | Full |
| 22 | Hill St. / First St. | 0.744 | C | 0.766 | C | 0.022 | No | 0.743 | C | -0.001 | No | |
| 23 | Hill St. / Second St. | 0.765 | C | 0.793 | C | 0.028 | No | 0.770 | C | 0.005 | No | |
| 24 | Hill St. / Third St. | 0.968 | E | 0.996 | E | 0.028 | Yes | 0.922 | E | -0.046 | No | Full |
| 25 | Hill St. / Fourth St. | 0.518 | A | 0.542 | A | 0.024 | No | 0.526 | A | 0.008 | No | |
| 26 | Hill St. / Sixth St. | 0.457 | A | 0.466 | A | 0.009 | No | 0.453 | A | -0.004 | No | |

| | | Future Without Project Conditions | | Future With Project Conditions | | | | Future With Project with Mitigation Conditions | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | Change in V/C | Significant Impact | V/C | LOS | Change in V/C | Significant Impact | Mitigates Impact |
| 27 | Broadway / Temple St. | 0.858 | D | 0.895 | D | 0.037 | Yes | 0.866 | D | 0.008 | No | Full |
| 28 | Broadway / First St. | 0.824 | D | 0.915 | E | 0.091 | Yes | 0.880 | D | 0.056 | Yes | Partial |
| 29 | Broadway / Second St. | 0.613 | B | 0.616 | B | 0.003 | No | 0.597 | A | -0.016 | No | |
| 30 | Broadway / Fourth St. | 0.474 | A | 0.489 | A | 0.015 | No | 0.476 | A | 0.002 | No | |
| 31 | Spring St. / First St. | 0.592 | A | 0.609 | B | 0.017 | No | 0.592 | A | 0.000 | No | |
| 32 | Spring St. / Second St. | 0.609 | B | 0.612 | B | 0.003 | No | 0.596 | A | -0.013 | No | |
| **B.** | **P.M Peak Hour** | | | | | | | | | | | |
| 1 | Figueroa St. / Third St. | 0.965 | E | 0.985 | E | 0.020 | Yes | 0.957 | E | -0.008 | No | Full |
| 2 | Figueroa St. / Fifth St. | 0.781 | C | 0.795 | C | 0.014 | No | 0.772 | C | -0.009 | No | |
| 3 | Figueroa St. / Sixth St. | 0.650 | B | 0.658 | B | 0.008 | No | 0.640 | B | -0.010 | No | |
| 4 | I-110 Off Ramp / Temple St. | 0.409 | A | 0.413 | A | 0.004 | No | 0.402 | A | -0.007 | No | |
| 5 | Hope St. / Temple St. / US-101 Ramps | 0.971 | E | 1.015 | F | 0.044 | Yes | 0.985 | E | 0.014 | Yes | Partial |
| 6 | Hope St. / First St. | 0.733 | C | 0.830 | D | 0.097 | Yes | 0.806 | D | 0.073 | Yes | Partial |
| 7 | Hope St. / GTK Way / Second Place | 0.776 | C | 0.845 | D | 0.069 | Yes | 0.822 | D | 0.046 | Yes | Partial |
| 8 | Flower St. / Third St. | 0.546 | A | 0.569 | A | 0.023 | No | 0.552 | A | 0.006 | No | |
| 9 | Flower St. / Fifth St. | 0.517 | A | 0.535 | A | 0.018 | No | 0.519 | A | 0.002 | No | |
| 10 | Flower St. / Sixth St. | 0.498 | A | 0.515 | A | 0.017 | No | 0.500 | A | 0.002 | No | |
| 11 | Grand Ave. / US-101 Ramps / I-110 Ramps | 0.994 | E | 1.100 | F | 0.106 | Yes | 1.064 | F | 0.070 | Yes | Partial |
| 12 | Grand Ave. / Temple St. | 0.844 | D | 0.896 | D | 0.052 | Yes | 0.868 | D | 0.024 | Yes | Partial |
| 13 | Grand Ave. / First St. | 0.850 | D | 0.918 | E | 0.068 | Yes | 0.889 | D | 0.039 | Yes | Partial |
| 14 | Grand Ave. / Upper Second St. | 0.504 | A | 0.708 | C | 0.204 | Yes | 0.689 | B | 0.185 | No | Full |
| 15 | Grand Ave. / Fifth St. | 0.565 | A | 0.597 | A | 0.032 | No | 0.580 | A | 0.015 | No | |
| 16 | Olive St. / First St. | 0.627 | B | 0.801 | D | 0.174 | Yes | 0.770 | C | 0.143 | Yes | Partial |
| 17 | Olive St. / Second St. | 0.406 | A | 0.583 | A | 0.177 | No | 0.567 | A | 0.161 | No | |
| 18 | Olive St. / Fourth St. | 0.653 | B | 0.740 | C | 0.087 | Yes | 0.719 | C | 0.066 | Yes | Partial |
| 19 | Olive St. / Fifth St. | 0.812 | D | 0.858 | D | 0.046 | Yes | 0.833 | D | 0.021 | Yes | Partial |
| 20 | Olive St. / Sixth St. | 0.486 | A | 0.513 | A | 0.027 | No | 0.499 | A | 0.013 | No | |
| 21 | Hill St. / Temple St. | 0.933 | E | 0.941 | E | 0.008 | No | 0.915 | E | -0.018 | No | |
| 22 | Hill St. / First St. | 0.911 | E | 0.947 | E | 0.036 | Yes | 0.920 | E | 0.009 | No | Full |

| | | Future Without Project Conditions | | Future With Project Conditions | | | | Future With Project with Mitigation Conditions | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | Change in V/C | Significant Impact | V/C | LOS | Change in V/C | Significant Impact | Mitigates Impact |
| 23 | Hill St. / Second St. | 0.679 | B | 0.845 | D | 0.166 | Yes | 0.813 | D | 0.134 | Yes | Partial |
| 24 | Hill St. / Third St. | 1.018 | F | 1.103 | F | 0.085 | Yes | 1.007 | F | -0.011 | No | Full |
| 25 | Hill St. / Fourth St. | 0.760 | C | 0.851 | D | 0.091 | Yes | 0.819 | D | 0.059 | Yes | Partial |
| 26 | Hill St. / Sixth St. | 0.586 | A | 0.609 | B | 0.023 | No | 0.591 | A | 0.005 | No | |
| 27 | Broadway / Temple St. | 0.834 | D | 0.866 | D | 0.032 | Yes | 0.842 | D | 0.008 | No | Full |
| 28 | Broadway / First St. | 0.841 | D | 0.939 | E | 0.098 | Yes | 0.908 | E | 0.067 | Yes | Partial |
| 29 | Broadway / Second St. | 0.748 | C | 0.768 | C | 0.020 | No | 0.746 | C | -0.002 | No | |
| 30 | Broadway / Fourth St. | 0.646 | B | 0.678 | B | 0.032 | No | 0.657 | B | 0.011 | No | |
| 31 | Spring St. / First St. | 0.582 | A | 0.622 | B | 0.040 | No | 0.603 | B | 0.021 | No | |
| 32 | Spring St. / Second St. | 0.509 | A | 0.517 | A | 0.008 | No | 0.503 | A | -0.006 | No | |

"Mitigation Measure F-11: During each construction phase, Related, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that a shuttle service shall be provided to construction workers who are required to park in offsite parking lots, if such lots are not within a walking distance of 1,100 feet from the respective construction sites. The CRA/LA shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park."

e. Volume 2, Section IV.F, Air Quality, page 563, following mitigation No. F-10. Add the following new mitigation measure

Mitigation Measure F-12: During each construction phase, the Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall equip major earth moving equipment, haul trucks, and excavation equipment with particulate filters and catalytic converters. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or its designee shall determine compliance with this measure with regard to the Civic Park.

**Section IV.G. NOISE**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.H. HAZARDS AND HAZARDOUS MATERIALS**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.I.1. FIRE SERVICES**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.I.1. POLICE SERVICES**

There are no corrections and additions to this section of the Draft EIR.

## Section IV.I.3. SCHOOLS

a. Volume 2, Section IV.I.3, Schools. Page 654, first paragraph, third sentence. Replace the third sentence with the following:

"As stated in the 2005-2006 Fingertips Fact Sheet, the LAUSD operates 431 elementary schools, 73 middle schools, and 54 senior high schools."

b. Volume 2, Section IV.I.3, Schools. Page 654, third paragraph, third sentence. Replace the third sentence with the following:

"All LAUSD Enrollment and Capacity Reports take into account portable classrooms on site, additions being built onto existing schools, student permit and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools. 'Eligible resident' enrollments may be less than actual enrollments primarily due to the implementation of multi-track calendars. The key goal of the Superintendent and Board of Education is to return all schools to a traditional two-semester (one-track) calendar. 'Projected capacity,' as reported in LAUSD's Enrollments and Capacities Report, identifies the future school capacity after shifting to a two-semester (one-track) calendar and implementing operational goals such as a full-day kindergarten and class-size reduction. Several options allow students to enroll in schools away from their home attendance area, including open enrollment, permits with transportation (PWT), employment-related transfer permits, sibling permits, and childcare permits, all of which are described in greater detail below."

c. Volume 2, Section IV.I.3, Schools. Page 655, first paragraph. Replace the first paragraph with the following:

"According to the LAUSD, current shortage/overage of seats is defined separately from future shortages/overages, as specified in LAUSD's Enrollments and Capacity Reports. A school is considered to be currently overcrowded if: (1) the school is currently on a multi-track calendar, (2) there is currently a seating shortage, or (3) there is currently a seating overage of less than, or equal to, a 'safety margin' of 30 seats. For future planning purposes, a school will be considered to be overcrowded if: (1) the school remains on a multi-track calendar, (2) there will be a seating shortage in the future, or (3) there will be a seating shortage of less than, or equal to, a 'safety margin' of 30 seats in the future."

d. Volume 2, Section IV.I.3, Schools. Page 656, first paragraph. Add the following sentence to the beginning of the paragraph:

"The Project would be served by five schools, including three elementary schools, one middle schools and one senior high school.

e. Volume 2, Section IV.I.3, Schools. Page 656, first paragraph. Add the following bulleted item following the first paragraph:

" • Ninth Street Elementary School, located approximately 1.2 miles southeast of the Project site at 820 Towne Avenue, provides educational services for kindergarten through fifth grade (K-5). The school operates on a single track and has an actual enrollment of 464 students."

f. Volume 2, Section IV.I.3, Schools. Page 656, second paragraph, second sentence. Replace the second sentence with the following item:

"As shown in the comparison of Resident Enrollments and Current Capacities, Castelar Elementary School has a current overage of 95 seats, Gratts Elementary School has a seating overage of 85 seats, and Ninth Street Elementary School has a seating overage of 267 seats."

g. Volume 2, Section IV.I.3, Schools. Page 656, second paragraph, third through fifth sentences. Replace the third through fifth sentences with the following:

"In a comparison of Resident Enrollments and Current Capacities, Virgil Middle School and Belmont High School are operating with seating shortages of 1,842 and 2,168, respectively. Actual enrollments (2,806 and 4,941, respectively), which are generally consistent with current capacity, indicate that the LAUSD is currently enrolling students in other schools as a remedial measure for overcrowded conditions at Virgil Middle School and Belmont High School. In addition, these schools operate on a multi-track calendar, which further indicates overcrowding."

h. Volume 2, Section IV.I.3, Schools. Page 657, Table 76. Replace Table 76 with the revised Table 76 on the following page.

i. Volume 2, Section IV.I.3, Schools. Page 657, first paragraph, third sentence. Replace the third sentence with the following:

"In calculating student generation by the proposed Project it is assumed that all of the students associated with the residential component of the Project are located within the attendance boundaries of Castelar, Gratts, and Ninth Street Elementary Schools, Virgil Middle School, and Belmont High School."

j. Volume 2, Section IV.I.3, Schools. Page 657, first paragraph, last sentence. Replace the last sentence with the following:

**Revised Table 76**

**Existing School Capacities**

| School | Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current Seating overage/(Shortage) | Overcrowding Now? |
|---|---|---|---|---|---|---|
| Castelar Elementary | 1 Track | 907 | 812 | 793 | 95 | No |
| Gratts Elementary | 3 Tracks | 1051 | 966 | 921 | 85 | Yes |
| Ninth St. Elementary | 1 Track | 531 | 254 | 464 | 267 | No |
| Virgil Middle | 3 Tracks | 2819 | 4661 | 2806 | (1842) | Yes |
| Belmont Senior High | 3 Tracks | 4915 | 7063 | 4941 | (2166) | Yes |

[a] *Current capacity provided by the LAUSD for the 2006-2007 school year.*

*Source: LAUSD Response letter with regard to the Grand Avenue Project Draft EIR, July 25, 2006.*

"Project employees who travel less than five minutes to work are assumed to generate students within the attendance boundaries of Castelar, Gratts, and Ninth Street Elementary Schools, Project employees who travel less than 10 minutes to work are assumed to generate students within the attendance boundaries of Virgil Middle School, and Project employees who travel less than 15 minutes to work are assumed to generate students within the attendance boundaries of Belmont Senior High School."

k. Volume 2, Section IV.I.3, Schools. Page 660, second paragraph, second sentence. Add the following after the second sentence:

"The Ninth Street School is located approximately one mile to the south-southeast of the Project site, near the intersection of Ninth Street and Towne Avenue. Since this intersection is not located between the Project site and the I-101 and I-110 freeways, which would provide the immediate access to and from the Project site for construction trucks, haul routes would not interfere with school bus or student pedestrian routes."

l. Volume 2, Section IV.I.3, Schools. Page 661, fourth paragraph, first sentence. Revise the first sentence as follows:

"Based on the number of employees living within the attendance boundaries of the schools that would serve the Project and the LAUSD student generation rates, employees of the commercial component of the Project with County Office Building Option would generate 92 students: eight students within the attendance boundaries of Castelar, Gratt, and Ninth Street Elementary Schools, 25 students within the attendance boundaries of Virgil Middle School, and 59 students within the attendance boundaries of Belmont High School."

m. Volume 2, Section IV.I.3, Schools. Page 661, fourth paragraph, last sentence. Revise the last sentence as follows:

"As the Project is located in an area where students may attend any of the three elementary schools and each school is located roughly one mile from the Project area, it is anticipated that approximately one-third of the projected 250 elementary school students (83 students) would attend Castelar Elementary School, one-third would attend Gratts Elementary School, and one-third would attend Ninth Street Elementary School."

n. Volume 2, Section IV.I.3, Schools. Page 663, second paragraph, first sentence. Revise the first sentence as follows:

"The following discussion analyzes the impact on the ability of existing school facilities at Castelar Elementary School, Gratts Elementary School, Ninth Street Elementary School, Virgil Middle School, and Belmont High School, as well as planned future school facilities, to accommodate the anticipated students generated by the Project with County Office Building Option and the Project with Additional Residential Development Option.

o. Volume 2, Section IV.I.3, Schools. Page 663, third paragraph. Revise the paragraph as follows:

"The 560 students generated by the Project with County Office Building Option, consisting of 250 elementary school students, 141 middle school students, and 169 high school students, would contribute to the projected seating shortage or overcrowding at three of the identified serving schools. As shown in Table 78 on page 12, based on LAUSD projected 2006-2007 enrollment figures, implementation of the Project with County office Building Option would contribute to the following seating shortages: 1,842 seats at Virgil Middle School, and 2,166 seats at Belmont High School. With the distribution of 83 students at each of the three elementary schools, the Project would not exceed the estimated seating overage of 95 seats at Castelar Elementary School, 85 seats at Gratts Elementary School, and 267 seats at Ninth Street Elementary School. However, since Gratts Elementary School is operating on a three-track schedule, the school is considered overcrowded, while Castelar Elementary School is considered overcrowded as it would have a seating overage of less

than 30 students once Project students are accounted for. Therefore, the Project would contribute to overcrowding at Gratts Elementary School, Castelar Elementary School, Virgil Middle School, and Belmont High School. As a result, impacts of the Project with County Office Building Option on existing LAUSD facilities serving the Project site would be significant.

p. Volume 2, Section IV.I.3, Schools. Page 664, second paragraph, first sentence. Revise the first sentence as follows:

"As concluded above, four schools that would serve the Project are projected to be overcrowded in the future with or without the Project."

q. Volume 2, Section IV.I.3, Schools. Page 664, third paragraph, last sentence. Revise the last sentence as follows:

"Notwithstanding, significant impacts would continue to occur at Gratts Elementary Schools as, despite the construction of the new Gratts Primary School, Project-generated students could not be accommodated within the existing or future capacities of this school, due to its multi-track calendar."

r. Volume 2, Section IV.I.3, Schools. Page 665, Table 78. Replace Table 78 with the revised Table 78, on the following page.

s. Volume 2, Section IV.I.3, Schools. Page 666, second paragraph, last sentence. Revise the last sentence as follows:

"Based on the number of employees living within the attendance boundaries of the schools that would serve the Project and the LAUSD student generation rates, employees under the Project with Additional Residential Development Option would generate 33 students: three students within the attendance boundaries of Castelar, Gratts, and Ninth Street Elementary Schools, nine students within the attendance boundaries of Virgil Middle School, and 21 students within the attendance boundaries of Belmont High School."

t. Volume 2, Section IV.I.3, Schools. Page 666, fourth paragraph, third sentence. Revise the third sentence as follows:

"Based on LAUSD projected enrollment figures, implementation of the Project with Additional Residential Development Option, as shown in Table 80 on page 14, would contribute to the following seating shortages: 10 seats at Castelar Elementary School, 20 seats at Gratts Elementary School, 2,009 seats at Virgil Middle School, and 2,335 seats at Belmont High School. No seating shortages would occur at the Ninth Street School. As a

**Revised Table 78**

**Impact on Existing LAUSD School Facilities**
**Project with County Office Building Option**

| School | Projected Capacity | Resident Enrollment | Projected Seating Overage (Shortage) Without Project | Project-Generated Students | Project + Projected | Seating Overage (Shortage) with Project and Projected Development |
|---|---|---|---|---|---|---|
| Castelar Elementary | 907 | 812 | 95 | 83 | 990 | 12 |
| Gratts Elementary | 1051 | 966 | 85 | 83 | 1,134 | 2 |
| Ninth St. Elementary | 531 | 254 | 267 | 83 | 614 | 184 |
| Virgil Middle | 1,950 | 4,661 | (1,842) | 141 | 2,091 | (1,983) |
| Belmont Senior High | 3,042 | 7,063 | (2,166) | 169 | 3,211 | (2,335) |

*Source: LAUSD Response letter with regard to the Grand Avenue Project Draft EIR, 2006-2007 Projected Enrollments July 25, 2006.*

result, the impacts of the Project with Additional Residential Development Option on existing LAUSD facilities serving the Project site would be significant.

u. Volume 2, Section IV.I.3, Schools. Page 669, Table 80. Replace Table 80 with the revised Table 80 on the following page.

v. Volume 2, Section IV.I.3, Schools. Page 668, last paragraph, second sentence. Revise the second sentence as follows:

"As the Project would not impact schools within other attendance boundaries, cumulative impacts related to schools are analyzed only for projects within the same attendance boundaries as the schools identified to serve the Project: Castelar Elementary School, Gratts Elementary School, Ninth Street Elementary School, Virgil Middle School and Belmont Senior High School. Cumulative impacts were assessed utilizing the LAUSD student generation factors for non-specified housing types (0.1456 per unit), as information regarding the specific dwelling unit mix of the individual related projects is not available.

**Table 80**

**Impact on Existing LAUSD School Facilities**
**Project with Additional Residential Development Option**

| School | Projected Capacity | Resident Enrollment | Projected Seating Overage (Shortage) Without Project | Project-Generated Students | Project + Projected | Seating Overage (Shortage) with Project and Projected Development |
|---|---|---|---|---|---|---|
| Castelar Elementary | 907 | 812 | 95 | 105 | 1,012 | (10) |
| Gratts Elementary | 1051 | 966 | 85 | 105 | 1,156 | (20) |
| Ninth St. Elementary | 531 | 254 | 267 | 105 | 636 | 162 |
| Virgil Middle | 1,950 | 4,661 | (1,842) | 157 | 2,107 | (2009) |
| Belmont Senior High | 3,042 | 7,063 | (2,166) | 161 | 3,203 | (2,335) |

*Source: LAUSD Response letter with regard to the Grand Avenue Project Draft EIR, 2006-2007 Projected Enrollments July 25, 2006.*

w. Volume 2, Section IV.I.3, Schools. Page 670, second paragraph. Add the following new paragraph after the second paragraph.

"Forty-two related projects (Nos. 1, 3, 9, 10, 24 through 35, 39 through 52, 57, 58, 62, 64, 65, 70, 78, 79, 84, 87, 88, and 93) have been identified within the attendance boundaries of the Ninth Street Elementary School. The related projects include the development of approximately 7,210 multi-family dwelling units, 563,877 square feet of retail/restaurant uses, and 2,656,000 square feet of offices. The multi-family dwelling units would generate approximately 1,728 elementary school students (7,210 x 0.1456 = 1,049). Related projects in which employees are indicated in place of floor area (Related Projects No. 39 and 43), office uses, which are expected to generate 7,783 employees, and retail uses, which are expected to generate 2,256 employees, would generate approximately 1,064 elementary school students within the local attendance boundary (generation factor of 0.106 x 10,039 =

1,064). Thus, the total estimated elementary school students generated by the related projects within the current attendance boundaries of the Ninth Street Elementary School is approximately 2,113 students. These students in addition to the students generated by the Project with County Office Building Option (83 students) total 2,196 students. These students in addition to the students generated by the Project with Additional Residential Development Option-related (105 students) total 2,218 students."

**Section IV.I.4. LIBRARIES**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.J.1 WATER SUPPLY**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.J.2 WASTEWATER**

There are no corrections and additions to this section of the Draft EIR.

**Section IV.J.3 SOLID WASTE**

There are no corrections and additions to this section of the Draft EIR.

**Section V. ALTERNATIVES TO THE PROPOSED PROJECT**

There are no corrections and additions to this section of the Draft EIR.

**Section VI. OTHER CEQA CONSIDERATIONS**

There are no corrections and additions to this section of the Draft EIR.

**Section VII. BIBLIOGRAPHY AND REFERENCES**

a. Draft EIR, Volume 2, Section VIII, page 867. Add the following references to the Draft EIR bibliography:

"Birnbaum, Charles, Protecting Cultural Landscapes: Planning, Treatment and Management of Cultural Landscapes. Preservation Brief #36, Washington, D.C.: National Park Service, 1994.

Birnbaum, Charles and Karson, Robin, Eds. Pioneers of American Landscape Design. New York: McGraw-Hill, 2000.

Birnbaum, Charles with Peters, Christine Capella, The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes. Washington, D.C.: National Park Service, 1996.

Interagency Resources Division, National Register Bulletin: How to Apply the National Register Criteria for Evaluation. Department of the Interior, National Park Service, fWashington, D.C., 1997.

Los Angeles County, County Hall of Administration Employee Travel Survey, June/July 2005"

**Section VIII. LIST OF PREPARERS**

There are no corrections and additions to this section of the Draft EIR.

**APPENDIX B: TRAFFIC ANALYSIS**

a. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 99, fourth and fifth paragraphs. Replace the fourth and fifth paragraphs with the following:

"The capacity of the transit system service to the Project area was also estimated and is summarized in Table 5-7, which identifies transit lines, peak period headway, vehicle (bus and train) capacities and overall peak period capacity. These are capacities for one direction of transit service. The capacity of transit service directly serving the site, including the Red Line and bus services, is about 21,915 person trips in each peak hour. This is a conservatively low number as it does not include the Metro Blue and Metro Gold Lines and Metrolink, as passengers on those lines may walk to reach the Project or may transfer to the Red Line or buses (including DASH). When these other rail lines are added in to the calculation, then the transit capacity serving the Project area is 34,780 person trips per peak hour.

During the P.M. peak hour (the highest period of Project trip volume) there would be approximately 935 transit trips generated by the Project, of which about 661 would be outbound from the Project and about 274 trips would be inbound to the Project. The peak direction total of 661 trips would represent about 3.0 percent of the 21,915 person trip transit capacity directly serving the Project area, and about 1.9 percent of the total 34,780 person trip transit capacity serving the Bunker Hill/Civic Center area (including all rail service)."

b. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 101, Table 5-7. Replace Table 5-7 with the attached revised Table 5-7 as presented on the following pages.

c. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 120, sixth paragraph. Replace the sixth paragraph with the following:

"During the P.M. peak hour (the period of highest Project trip volume) there would be approximately 363 transit trips generated by the Project, of which about 163 would be outbound from the Project and about 200 trips would be inbound to the Project. The peak direction total of 200 trips would represent about 0.9 percent of the 21,915 person trip transit capacity directly serving the Project area, and about 0.6 percent of the total 34,780 person trip transit capacity serving the Bunker Hill/Civic Center area (including all rail service)."

d. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, Table 7-2, page 125. Change the parking requirement for 2-bedroom residential from "1" to "1.25."

e. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, Table 7-3, page 128. Replace Table 7-3 with that presented on page IV-27.

f. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 130, first paragraph, first two sentences. Replace the first two sentences with the following:

"Overall the City Code would require a total of 3,530 spaces to be provided by the Project. The proposed Project would provide 5,035 spaces, which would be 1,505 spaces more than the overall code requirement."

g. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 130, second paragraph. Replace the second paragraph with the following:

"In total, the City Code would require 2,245 residential parking spaces to be provided. The Project proposes to provide 3,105 residential spaces, which would be 860 more than the code requirement."

h. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 130, fourth paragraph. Replace the fourth paragraph with the following:

**Table 5-7** **Public Transit Service Capacity Serving the Project Area - Updated 08-14-06**

8/14/2006

| Route | Description | Approximate Peak Period Headway (minutes) | Vehicle / Train Capacity (Including Standees) | Hourly Capacity |
|---|---|---|---|---|
| Metro Bus Lines | | | | |
| 2 | Sunset Bl. | 5 | 49 | 588 |
| 4 | Santa Monica Bl. | 8 | 49 | 368 |
| 10 | Melrose Ave. - Virgil Ave. - Temple St. | 7 | 49 | 420 |
| 11 | Melrose Ave. - Beverly Bl. - Temple St. | 7 | 49 | 420 |
| 14 | Beverly Hills - Beverly Bl. | 12 | 49 | 245 |
| 30 | W.Pico Bl. - East 1st St. - Floral Dr. | 4 | 49 | 735 |
| 31 | W.Pico Bl. - East 1st St. | 4 | 49 | 735 |
| 33 | Venice Bl. | 10 | 49 | 294 |
| 37 | Adams Bl. | 12 | 49 | 245 |
| 40 | Hawthorne Bl. - Crenshaw Bl. - M.L.King Jr. Bl. | 10 | 49 | 294 |
| 42 | La Tijera Bl. - LAX City Bus Center | 13 | 49 | 226 |
| 45 | Broadway - Mercury Ave. | 6 | 49 | 490 |
| 46 | Broadway - Griffin Ave. | 6 | 49 | 490 |
| 48 | Maple Ave. - S. San Pedro St. | 7 | 49 | 420 |
| 60 | Long Beach Bl. - Santa Fe Ave. | 6 | 49 | 490 |
| 68 | W. Washington Bl. - Cesar E. Chavez Ave. | 7 | 49 | 420 |
| 70 | Garvey Ave. (LA / El Monte) | 7 | 49 | 420 |
| 76 | Valley Bl. - Main St. (El Monte Bus Station) | 9 | 49 | 327 |
| 78 | Huntington Dr. - Main St. - Las Tunas Dr. (LA / S. Arcadia) | 20 | 49 | 147 |
| 79 | Huntington Dr. (LA / Arcadia) | 20 | 49 | 147 |
| 81 | Figueroa St. | 10 | 49 | 294 |
| 96 | Riverside - LA Zoo | 20 | 49 | 147 |
| 302 | Sunset Bl. Limited | 10 | 49 | 294 |
| 360 | Long Beach Bl. Limited | 10 | 49 | 294 |
| 381 | Figueroa St. Limited | 10 | 49 | 294 |
| 439 | Redondo Beach - LAX City Bus Center - Patsaouras Transit Plaza/Union Station Express | 45 | 49 | 65 |
| 442 | South Bay Galleria Transit Center - Hawthorne - Manchester - Patsaouras Transit Plaza/Union Station | 25 | 49 | 118 |
| 444 | Rancho Palos Verdes - Rolling Hills Estates - Torrance - Patsaouras Transit Plaza/Union Station Express | 30 | 49 | 98 |
| 445 | San Pedro - Artesia Transit Center - Patsaouras Transit Plaza/Union Station Express | 35 | 49 | 84 |
| 446 | San Pedro - Pacific Ave. - Wilmington - Carson - Patsaouras Transit Plaza/Union Station Express | 60 | 49 | 49 |
| 447 | San Pedro - 7th St. - Wilmington - Carson - Patsaouras Transit Plaza/Union Station Express | 60 | 49 | 49 |
| 484 | Cal Poly Pomona - La Puente - Valley Bl. - LA Express | 13 | 49 | 226 |
| 485 | Lake Ave. - Oak Knoll - Fremont - LA Express | 15 | 49 | 196 |
| 487 | El Monte - Santa Anita Ave. - Sierra Madre - San Gabriel Ave. - LA Express | 18 | 49 | 163 |
| 489 | Temple City - Rosemead Bl. - LA Express | 18 | 49 | 163 |
| 490 | Cal Poly Pomona - Walnut - Covina - Baldwin Park - Ramona Bl. - LA Express | 20 | 49 | 147 |
| 720 | Wilshire - Whittier Bl. | 5 | 49 | 588 |
| 745 | South Broadway | 4 | 49 | 735 |
| | | | Subtotal | 11,925 |
| Antelope Valley Transit | | | | |
| AV 785 | Antelope Valley - Downtown Los Anegeles - Union Station | 25 | 49 | 118 |
| Foothill Transit | | | | |
| FT 480 | Montclair - West Covina - El Monte - Downtown Los Angeles via I-10 | 15 | 49 | 196 |
| FT 482 | Pomona - Hacienda Heights - Downtown Los Angeles via Colima Rd. | 30 | 49 | 98 |
| FT 486 | Pomona - El Monte - Downtown Los Angeles via Amar Road | 15 | 49 | 196 |
| FT 488 | Glendora - West Covina - Downtown Los Angeles Express | 30 | 49 | 98 |
| FT 492 | Montclair - Arcadia - Los Angeles Expressway via Arrow Highway | 30 | 49 | 98 |
| FT 494 | San Dimas - Glendora - Downtown Los Angeles Express | 30 | 49 | 98 |

**Table 5-7** **Public Transit Service Capacity Serving the Project Area - Updated 08-14-06** 8/14/2006

| Route | Description | Approximate Peak Period Headway (minutes) | Vehicle / Train Capacity (including Standees) | Hourly Capacity |
|---|---|---|---|---|
| LADOT Commuter Express | | | | |
| CE 409 | Sylmar - Sunland - Tujunga - Glendale | 15 | 49 | 196 |
| CE 419 | Chatsworth - Northridge - Granada Hills - Mission Hills | 15 | 49 | 196 |
| CE 423 | Newbury Park - Thousand Oaks - Woodland Hills - Calabasas - Encino | 15 | 49 | 196 |
| CE 430 | Pacific Palisades - Brentwood - VA Medical Ctr. | 30 | 49 | 98 |
| CE 431 | Westwood - Palms | 30 | 49 | 98 |
| CE 437 | Venice - Marina Del Ray - Culver City | 22 | 49 | 134 |
| CE 438 | Redondo Beach - Hermosa Beach - Manhattan Beach - El Segundo | 15 | 49 | 196 |
| CE 448 | Rancho Palos Verdes - Lomita - Wilmington - Harbor City | 25 | 49 | 118 |
| Montebello Municipal Bus Lines | | | | |
| M 341 | Montelbello to Downtown Los Angeles from Taylor Ranch Express | 30 | 49 | 98 |
| Santa Monica Municipal Bus Lines | | | | |
| SM 10 | Santa Monica - Los Angeles Freeway Express | 15 | 49 | 196 |
| Torrance Transit | | | | |
| T 1 | Torrance - Los Angeles via Gardena | 30 | 49 | 98 |
| T 2 | Torrance - Los Angeles via South Bay Galleria Transit Center | 60 | 49 | 49 |
| LADOT - DASH | | | | |
| LDB | Route B: Chinatown - Financial District | 8 | 35 | 263 |
| LDD | Route D: Union Station / South Park | 5 | 35 | 420 |
| LDCHS | City Hall Shuttle | 6 | 35 | 350 |
| LDMSB | Metrolink Shuttle Bunker Hill | 7 | 35 | 300 |
| | | | Subtotal | 3,906 |
| Metro Rail Lines | | | | |
| Blue | 7th / Metro Center and Long Beach | 5 | 288 | 3,456 |
| Red | Union Station and North Hollywood - Union Station and Wilshire / Western | 10 | 1,014 | 6,084 |
| Gold | Union Station and Sierra Madre Villa | 10 | 352 | 2,112 |
| | | | Subtotal | 11,652 |
| Metrolink Commuter Rail Lines | | | | |
| Ventura County Line | Montalvo - LA Union Station | 38 | 576 | 909 |
| Antelope Valley Line | Lancaster - LA Union Station | 31 | 576 | 1,115 |
| San Bernardino Line | San Bernardino - Pomona - LA Union Station | 20 | 576 | 1,728 |
| Riverside Line | Downtown Riverside - LA Union Station | 33 | 576 | 1,047 |
| Orange County Line | Oceanside - Irvine - Anaheim - LA Union Station | 20 | 576 | 1,728 |
| 91 Line | San Bernardino - Anaheim - Commerce - LA Union Station | 45 | 576 | 768 |
| | | | Subtotal | 7,296 |
| | | | **Total** | 34,779 |

**Table 7-3** **Summary of Parking Requirements and Proposed Parking Supply Project with County Office Building Option**

9/18/2006

As Per City Code Parking Requirement and CDP Advisory Agency AA-2000-1

| Land Use | Parcel Q | | | Parcel W-1/W-2 | | | Parcel L / M-2 | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided[1] | Difference | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference |
| Residential | 1,000 | 755 | -245 | 1,421 | 1,070 | -351 | 1,700 | 1,280 | -420 | 4,121 | 3,105 | -1,016 |
| Commercial | 429 | 755 | 326 | 755 | 885 | 130 | 101 | 290 | 189 | 1,285 | 1,930 | 645 |
| Total | 1,429 | 1,510 | 81 | 2,176 | 1,955 | -221 | 1,801 | 1,570 | -231 | 5,406 | 5,035 | -371 |

Source: Table B-1 City Code Parking Requirement and CDP Advisory Agency AA-2000-1, Appendix B.

1. Excludes 683 off-site spaces for County Office Building

As Per City Code Parking Requirement

| Land Use | Parcel Q | | | Parcel W-1/W-2 | | | Parcel L / M-2 | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided[1] | Difference | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference |
| Residential | 545 | 755 | 210 | 774 | 1,070 | 296 | 926 | 1,280 | 354 | 2,245 | 3,105 | 860 |
| Commercial | 429 | 755 | 326 | 755 | 885 | 130 | 101 | 290 | 189 | 1,285 | 1,930 | 645 |
| Total | 974 | 1,510 | 536 | 1,529 | 1,955 | 426 | 1,027 | 1,570 | 543 | 3,530 | 5,035 | 1,505 |

Source: Table B-2 City Code Parking Requirement, Appendix B.

1 Excludes 683 off-site spaces for County Office Building

"For Parcel Q, the City Code would require 545 residential parking spaces to be provided. The Project proposes to provide 755 residential spaces, which would be 210 more than the code requirement."

i. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 130, sixth paragraph. Replace the sixth paragraph with the following:

"For Parcel W-1/W-2, the City Code would require 774 residential parking spaces to be provided. The Project proposes to provide 1,070 residential spaces, which would be 296 more than the code requirement."

j. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 130, eighth paragraph. Replace the eighth paragraph with the following:

"For Parcel L/M-2, the City Code would require 962 residential parking spaces to be provided. The Project proposes to provide 1,280 residential spaces, which would be 354 more than the code requirement."

k. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 133, second paragraph, first sentence. Replace the first sentence with the following:

"The proposed Project would provide 3,105 residential parking spaces compared to a code requirement of 2,245 spaces."

l. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, Table 8-2, page 150. Replace Table 8-2 with that presented on the following page:

m. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 151, third paragraph. Replace the third paragraph with the following:

"For Parcel W-1/W-2, the City Code would require 1,428 residential parking spaces to be provided. The Project proposes to provide 1,971 residential spaces, which would be 543 more than the policy requirement."

n. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 151, fifth paragraph. Replace the fifth paragraph with the following:

**Table 8-2** **Summary of Parking Requirements and Proposed Parking Supply**
**Project with Additional Residential Development Option**

9/18/2006

As Per City Code Parking Requirement and CDP Advisory Agency AA-2000-1

| Land Use | Parcel Q | | | Parcel W-1/W-2 | | | Parcel L / M-2 | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference |
| Residential | 1,000 | 755 | -245 | 2,621 | 1,971 | -650 | 1,700 | 1,280 | -420 | 5,321 | 4,006 | -1,315 |
| Commercial | 429 | 755 | 326 | 74 | 204 | 130 | 101 | 290 | 189 | 604 | 1,249 | 645 |
| Total | 1,429 | 1,510 | 81 | 2,695 | 2,175 | -520 | 1,801 | 1,570 | -231 | 5,925 | 5,255 | -670 |

Source: Table B-9 City Code Parking Requirement and CDP Advisory Agency AA-2000-1, Appendix B.

As Per City Code Parking Requirement

| Land Use | Parcel Q | | | Parcel W-1/W-2 | | | Parcel L / M-2 | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference | Parking Required | Parking Provided | Difference |
| Residential | 545 | 755 | 210 | 1,428 | 1,971 | 543 | 926 | 1,280 | 354 | 2,899 | 4,006 | 1,107 |
| Commercial | 429 | 755 | 326 | 74 | 204 | 130 | 101 | 290 | 189 | 604 | 1,249 | 645 |
| Total | 974 | 1,510 | 536 | 1,502 | 2,175 | 673 | 1,027 | 1,570 | 543 | 3,503 | 5,255 | 1,752 |

Source: Table B-10 City Code Parking Requirement, Appendix B.

o. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 151, sixth paragraph. Replace the sixth paragraph with the following:

"In total, the City Code would require 2,899 residential parking spaces to be provided. The Project proposes to provide 4,006 residential spaces, which would be 1,107 more than the code requirement."

p. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 152, third paragraph, first sentence. Replace the first sentence with the following:

"The proposed Project would provide 4,006 residential parking spaces compared to a code requirement of 2,899 spaces."

q. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 161, second paragraph, second sentence. Replace the second sentence with the following:

"LADOT has determined that implementation of the ATCS mitigation improvement in the area surrounding the Project would comprise: upgrades to Model 2070 traffic signal controllers at 35 intersections; installation of 58 ATSAC/ATCS system vehicle detectors at 9 intersections; and installation of CCTV cameras - to provide video information to the ATSAC Center at eight locations."

r. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 162, after the third paragraph (under Section on Specific Intersection Improvements) add the following:

"The one exception where it was determined that a physical roadway improvement is feasible is at the intersection of Hill Street and 3rd Street. This intersection is located at the east entrance to the Third Street Tunnel under Bunker Hill (two-lane one-way westbound tunnel). The westbound approach on 3rd Street would be restriped within the existing roadway width from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. This would also require a slight widening of 3rd Street west of Hill Street before the entrance to the tunnel within the public right-of-way. With this measure (in combination with the other mitigation measures), the P.M. peak volume/capacity ratio at this intersection for the Project with County Office Building Option would be reduced from 1.103 (LOS F) to 1.007 (LOS F) and would fully mitigate the Project impact. s. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, page 164, second paragraph, the bullet list and the following

paragraph Replace the second paragraph, the bullet list and the following paragraph with the following:

There would still be one significant unavoidable impact in the A.M. peak hour and 12 significant unavoidable impacts in the P.M. peak hour, would occur at the following locations (with the resultant level of service shown in parenthesis, and as shown in Table 9-1:

A.M. Peak Hour

- Broadway / First Street (LOS D)

P.M. Peak Hour

- Olive Street / First Street (LOS C)
- Olive Street / Fourth Street (LOS C)
- Hope Street / First Street (LOS D)
- Hope Street / GTK Way /Second Place (LOS D)
- Grand Avenue / Temple Street (LOS D)
- Grand Avenue / First Street (LOS D)
- Olive Street / Fifth Street (LOS D)
- Hill Street / Second Street (LOS D)
- Hill Street / Fourth Street (LOS D)
- Hope Street / Temple St. (US-101 Ramps) (LOS E)
- Broadway / First Street (LOS E)
- Grand Avenue / US-101 / I-110 Ramps (LOS F)

As can be seen from the above list however, all of these intersections would continue to operate at LOS D or better, except for two which would operate at LOS E in the P.M. peak hour (Hope Street/Temple Street/US-101 Ramps and Broadway/1st Street), and one which would operate at LOS F in the P.M. peak hour (Grand Avenue/US-101/I-110 Ramps)."

t. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, Table 9-1, page 165. Replace Table 9-1 with that presented on the following pages.

u. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, Appendix B, Table B-2. Replace Table B-2 with that presented on page IV-35.

v. Volume 3, Appendix B, The Mobility Group, "Grand Avenue Project – EIR Traffic Study," May 30, 2006, Appendix B, Table B-2. Replace Table B-10 with that presented on page IV-36.

**APPENDIX D: AIR CALCULATION WORKSHEETS**

a. Vol. 3, Appendix D-3. The CALINE4 modeling output sheets presented on page IV-37 are added to Appendix D-3.

**Table 9-1** **Intersection Level Of Service - Future With Project Conditions - Project with County Office Building Option With Mitigation** 8/25/2006

**A. A.M Peak Hour**

| | | Future Without Project Condtions | | Future With Project Conditions | | | | Future With Project with Mitigation Conditions | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | Change in V/C | Significant Impact | V/C | LOS | Change in V/C | Significant Impact | Mitigates Impact |
| 1 | Figueroa St. / 3rd St. | 0.827 | D | 0.837 | D | 0.010 | No | 0.814 | D | -0.013 | No | |
| 2 | Figueroa St. / 5th St. | 0.487 | A | 0.492 | A | 0.005 | No | 0.479 | A | -0.008 | No | |
| 3 | Figueroa St. / 6th St. | 0.626 | B | 0.632 | B | 0.006 | No | 0.614 | B | -0.012 | No | |
| 4 | I-110 Off Ramp / Temple St. | 0.398 | A | 0.400 | A | 0.002 | No | 0.389 | A | -0.009 | No | |
| 5 | Hope St. / Temple St. / US-101 Ramps | 0.902 | E | 0.921 | E | 0.019 | Yes | 0.895 | D | -0.007 | No | Full |
| 6 | Hope St. / 1st St. | 0.925 | E | 0.935 | E | 0.010 | Yes | 0.910 | E | -0.015 | No | Full |
| 7 | Hope St. / GTK Way / 2nd Place | 0.420 | A | 0.452 | A | 0.032 | No | 0.440 | A | 0.020 | No | |
| 8 | Flower St. / 3rd St. | 0.671 | B | 0.678 | B | 0.007 | No | 0.660 | B | -0.011 | No | |
| 9 | Flower St. / 5th St. | 0.439 | A | 0.448 | A | 0.009 | No | 0.435 | A | -0.004 | No | |
| 10 | Flower St. / 6th St. | 0.528 | A | 0.540 | A | 0.012 | No | 0.525 | A | -0.003 | No | |
| 11 | Grand Ave. / US-101 Ramps / I-110 Ramps | 0.693 | B | 0.724 | C | 0.031 | No | 0.703 | C | 0.010 | No | |
| 12 | Grand Ave. / Temple St. | 0.930 | E | 0.929 | E | -0.001 | No | 0.903 | E | -0.027 | No | |
| 13 | Grand Ave. / 1st St. | 0.791 | C | 0.818 | D | 0.027 | Yes | 0.795 | C | 0.004 | No | Full |
| 14 | Grand Ave. / Upper 2nd St. | 0.537 | A | 0.670 | B | 0.133 | No | 0.651 | B | 0.114 | No | |
| 15 | Grand Ave. / 5th St. | 0.487 | A | 0.502 | A | 0.015 | No | 0.489 | A | 0.002 | No | |
| 16 | Olive St. / 1st St. | 0.531 | A | 0.609 | B | 0.078 | No | 0.590 | A | 0.059 | No | |
| 17 | Olive St. / 2nd St. | 0.283 | A | 0.359 | A | 0.076 | No | 0.351 | A | 0.068 | No | |
| 18 | Olive St. / 4th St. | 0.437 | A | 0.548 | A | 0.111 | No | 0.523 | A | 0.086 | No | |
| 19 | Olive St. / 5th St. | 0.623 | B | 0.654 | B | 0.031 | No | 0.636 | B | 0.013 | No | |
| 20 | Olive St. / 6th St. | 0.402 | A | 0.424 | A | 0.022 | No | 0.410 | A | 0.008 | No | |
| 21 | Hill St. / Temple St. | 0.762 | C | 0.815 | D | 0.053 | Yes | 0.792 | C | 0.030 | No | Full |
| 22 | Hill St. / 1st St. | 0.744 | C | 0.766 | C | 0.022 | No | 0.743 | C | -0.001 | No | |
| 23 | Hill St. / 2nd St. | 0.765 | C | 0.793 | C | 0.028 | No | 0.770 | C | 0.005 | No | |
| 24 | Hill St. / 3rd St. | 0.968 | E | 0.996 | E | 0.028 | Yes | 0.922 | E | -0.046 | No | Full |
| 25 | Hill St. / 4th St. | 0.518 | A | 0.542 | A | 0.024 | No | 0.526 | A | 0.008 | No | |
| 26 | Hill St. / 6th St. | 0.457 | A | 0.466 | A | 0.009 | No | 0.453 | A | -0.004 | No | |
| 27 | Broadway / Temple St. | 0.858 | D | 0.895 | D | 0.037 | Yes | 0.866 | D | 0.008 | No | Full |
| 28 | Broadway / 1st St. | 0.824 | D | 0.915 | E | 0.091 | Yes | 0.880 | D | 0.056 | Yes | Partial |
| 29 | Broadway / 2nd St. | 0.613 | B | 0.616 | B | 0.003 | No | 0.597 | A | -0.016 | No | |
| 30 | Broadway / 4th St. | 0.474 | A | 0.489 | A | 0.015 | No | 0.476 | A | 0.002 | No | |
| 31 | Spring St. / 1st St. | 0.592 | A | 0.609 | B | 0.017 | No | 0.592 | A | 0.000 | No | |
| 32 | Spring St. / 2nd St. | 0.609 | B | 0.612 | B | 0.003 | No | 0.596 | A | -0.013 | No | |

**Table 9-1** **Intersection Level Of Service - Future With Project Conditions - Project with County Office Building Option With Mitigation** 8/25/2006

**B. P.M Peak Hour**

| | | Future Without Project Condtions | | Future With Project Conditions | | | | Future With Project with Mitigation Conditions | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | Change in V/C | Significant Impact | V/C | LOS | Change in V/C | Significant Impact | Mitigates Impact |
| 1 | Figueroa St. / 3rd St. | 0.965 | E | 0.985 | E | 0.020 | Yes | 0.957 | E | -0.008 | No | Full |
| 2 | Figueroa St. / 5th St. | 0.781 | C | 0.795 | C | 0.014 | No | 0.772 | C | -0.009 | No | |
| 3 | Figueroa St. / 6th St. | 0.650 | B | 0.658 | B | 0.008 | No | 0.640 | B | -0.010 | No | |
| 4 | I-110 Off Ramp / Temple St. | 0.409 | A | 0.413 | A | 0.004 | No | 0.402 | A | -0.007 | No | |
| 5 | Hope St. / Temple St. / US-101 Ramps | 0.971 | E | 1.015 | F | 0.044 | Yes | 0.985 | E | 0.014 | Yes | Partial |
| 6 | Hope St. / 1st St. | 0.733 | C | 0.830 | D | 0.097 | Yes | 0.806 | D | 0.073 | Yes | Partial |
| 7 | Hope St. / GTK Way / 2nd Place | 0.776 | C | 0.845 | D | 0.069 | Yes | 0.822 | D | 0.046 | Yes | Partial |
| 8 | Flower St. / 3rd St. | 0.546 | A | 0.569 | A | 0.023 | No | 0.552 | A | 0.006 | No | |
| 9 | Flower St. / 5th St. | 0.517 | A | 0.535 | A | 0.018 | No | 0.519 | A | 0.002 | No | |
| 10 | Flower St. / 6th St. | 0.498 | A | 0.515 | A | 0.017 | No | 0.500 | A | 0.002 | No | |
| 11 | Grand Ave. / US-101 Ramps / I-110 Ramps | 0.994 | E | 1.100 | F | 0.106 | Yes | 1.064 | F | 0.070 | Yes | Partial |
| 12 | Grand Ave. / Temple St. | 0.844 | D | 0.896 | D | 0.052 | Yes | 0.868 | D | 0.024 | Yes | Partial |
| 13 | Grand Ave. / 1st St. | 0.850 | D | 0.918 | E | 0.068 | Yes | 0.889 | D | 0.039 | Yes | Partial |
| 14 | Grand Ave. / Upper 2nd St. | 0.504 | A | 0.708 | C | 0.204 | Yes | 0.689 | B | 0.185 | No | Full |
| 15 | Grand Ave. / 5th St. | 0.565 | A | 0.597 | A | 0.032 | No | 0.580 | A | 0.015 | No | |
| 16 | Olive St. / 1st St. | 0.627 | B | 0.801 | D | 0.174 | Yes | 0.770 | C | 0.143 | Yes | Partial |
| 17 | Olive St. / 2nd St. | 0.406 | A | 0.583 | A | 0.177 | No | 0.567 | A | 0.161 | No | |
| 18 | Olive St. / 4th St. | 0.653 | B | 0.740 | C | 0.087 | Yes | 0.719 | C | 0.066 | Yes | Partial |
| 19 | Olive St. / 5th St. | 0.812 | D | 0.858 | D | 0.046 | Yes | 0.833 | D | 0.021 | Yes | Partial |
| 20 | Olive St. / 6th St. | 0.486 | A | 0.513 | A | 0.027 | No | 0.499 | A | 0.013 | No | |
| 21 | Hill St. / Temple St. | 0.933 | E | 0.941 | E | 0.008 | No | 0.915 | E | -0.018 | No | |
| 22 | Hill St. / 1st St. | 0.911 | E | 0.947 | E | 0.036 | Yes | 0.920 | E | 0.009 | No | Full |
| 23 | Hill St. / 2nd St. | 0.679 | B | 0.845 | D | 0.166 | Yes | 0.813 | D | 0.134 | Yes | Partial |
| 24 | Hill St. / 3rd St. | 1.018 | F | 1.103 | F | 0.085 | Yes | 1.007 | F | -0.011 | No | Full |
| 25 | Hill St. / 4th St. | 0.760 | C | 0.851 | D | 0.091 | Yes | 0.819 | D | 0.059 | Yes | Partial |
| 26 | Hill St. / 6th St. | 0.586 | A | 0.609 | B | 0.023 | No | 0.591 | A | 0.005 | No | |
| 27 | Broadway / Temple St. | 0.834 | D | 0.866 | D | 0.032 | Yes | 0.842 | D | 0.008 | No | Full |
| 28 | Broadway / 1st St. | 0.841 | D | 0.939 | E | 0.098 | Yes | 0.908 | E | 0.067 | Yes | Partial |
| 29 | Broadway / 2nd St. | 0.748 | C | 0.768 | C | 0.020 | No | 0.746 | C | -0.002 | No | |
| 30 | Broadway / 4th St. | 0.646 | B | 0.678 | B | 0.032 | No | 0.657 | B | 0.011 | No | |
| 31 | Spring St. / 1st St. | 0.582 | A | 0.622 | B | 0.040 | No | 0.603 | B | 0.021 | No | |
| 32 | Spring St. / 2nd St. | 0.509 | A | 0.517 | A | 0.008 | No | 0.503 | A | -0.006 | No | |

**Table B-2** **City Code Parking Requirement (All Uses)**
**Project with County Office Building Option**

9/18/2006

| Land Use | City Code Requirement | Footnotes | Parcel Q | | | Parcel W-1/W-2 | | | Parcel L/M-2 | | | Total Project | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Quantity | Units | Spaces Required | Quantity | Units | Spaces Required | Quantity | Units | Spaces Required | Quantity | Units | Spaces Required |
| Hotel - Rooms | See Note 1 | 1 | 275 | Rooms | 54 | 0 | Rooms | 0 | 0 | Rooms | 0 | 275 | Rooms | 54 |
| Meeting Space | 10 spaces / 1,000 s.f | 2 | 9,000 | S.F | 90 | 0 | S.F | 0 | 0 | S.F | 0 | 9,000 | S.F | 90 |
| Subtotal Hotel | | | | | 144 | | | 0 | | | 0 | | | 144 |
| Retail | 1 space / 1,000 s.f | 3 | 168,000 | S.F | 168 | 64,000 | S.F | 64 | 86,000 | S.F | 86 | 318,000 | S.F | 318 |
| Restaurant | 1 space / 1,000 s.f | 3,7 | 42,000 | S.F | 42 | 10,000 | S.F | 10 | 15,000 | S.F | 15 | 67,000 | S.F | 67 |
| Health Club | 1 space / 1,000 s.f | 3 | 50,000 | S.F | 50 | 0 | S.F | 0 | 0 | S.F | 0 | 50,000 | S.F | 50 |
| Event Facility | 1 space / 10 seats | 4 | 250 | Seats | 25 | 0 | Seats | 0 | 0 | Seats | 0 | 250 | Seats | 25 |
| Subtotal Commercial | | | | | 285 | | | 74 | | | 101 | | | 460 |
| Office | 1 space / 1,000 s.f | 3 | 0 | S.F | 0 | 681,000 | S.F | 681 | 0 | S.F | 0 | 681,000 | S.F | 681 |
| Condominiums 1 - Bed | 1 space / D.U | 5 | 220 | D.U | 220 | 312 | D.U | 312 | 374 | D.U | 374 | 906 | D.U | 906 |
| 2 - Bed | 1.25 spaces / D.U | 5 | 155 | D.U | 194 | 222 | D.U | 277 | 265 | D.U | 331 | 642 | D.U | 802 |
| 3 - Bed | 1.25 spaces / D.U | 5 | 25 | D.U | 31 | 34 | D.U | 43 | 41 | D.U | 51 | 100 | D.U | 125 |
| Subtotal Condominiums | | | 400 | D.U | 445 | 568 | D.U | 632 | 680 | D.U | 756 | 1,648 | D.U | 1,833 |
| Apartments 1 - Bed | 1 space / D.U | 6 | 70 | D.U | 70 | 107 | D.U | 107 | 128 | D.U | 128 | 305 | D.U | 305 |
| 2 - Bed | 1 space / D.U | 6 | 0 | D.U | 0 | 35 | D.U | 35 | 42 | D.U | 42 | 77 | D.U | 77 |
| 3 - Bed | 1 space / D.U | 6 | 30 | D.U | 30 | 0 | D.U | 0 | 0 | D.U | 0 | 30 | D.U | 30 |
| Subtotal Apartments | | | 100 | D.U | 100 | 142 | D.U | 142 | 170 | D.U | 170 | 412 | D.U | 412 |
| Subtotal Residential | | | 500 | D.U | 545 | 710 | D.U | 774 | 850 | D.U | 926 | 2,060 | D.U | 2,245 |
| **Grand Total** | | | | | 974 | | | 1,529 | | | 1,027 | | | 3,530 |

Footnotes:

1. One space for each two individual guest room for first 20 rooms + one additional parking space for each four guest rooms in excess of 20 but not exceeding 40 + one additional parking space for each six guest rooms in excess of 40. (LAMC 12.21 A.4.(p).(2) Exception for Central City Area).
2. LAMC 12.21 A.4.(i).(1) Exception - Downtown Business District.
3. LAMC 12.21 A.4.(i).(3) Exception - Downtown Business District.
4. LAMC 12.21 A.4.(i).(1) Exception - Downtown Business District.
5. LAMC 12.21 A.4. (p).(1) Exception for Central City Area.
6. LAMC 12.22 A.25. (d).(2) Affordable Housing Production Incentives.
7. Includes 10,000 sq. ft. restaurant space in Civic Park.

**Table B-10** **City Code Parking Requirement (All Uses)**
**Project with Additional Residential Development Option**

9/18/2006

| Land Use | City Code Requirement | Footnotes | Parcel Q | | | Parcel W-1/W-2 | | | Parcel L/M-2 | | | Total Project | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Quantity | Units | Spaces Required | Quantity | Units | Spaces Required | Quantity | Units | Spaces Required | Quantity | Units | Spaces Required |
| Hotel - Rooms | See Note 1 | 1 | 275 | Rooms | 54 | 0 | Rooms | 0 | 0 | Rooms | 0 | 275 | Rooms | 54 |
| Meeting Space | 10 spaces / 1,000 s.f | 2 | 9,000 | S.F | 90 | 0 | S.F | 0 | 0 | S.F | 0 | 9,000 | S.F | 90 |
| Subtotal Hotel | | | | | 144 | | | 0 | | | 0 | | | 144 |
| Retail | 1 space / 1,000 s.f | 3 | 168,000 | S.F | 168 | 64,000 | S.F | 64 | 86,000 | S.F | 86 | 318,000 | S.F | 318 |
| Restaurant | 1 space / 1,000 s.f | 3,7 | 42,000 | S.F | 42 | 10,000 | S.F | 10 | 15,000 | S.F | 15 | 67,000 | S.F | 67 |
| Health Club | 1 space / 1,000 s.f | 3 | 50,000 | S.F | 50 | 0 | S.F | 0 | 0 | S.F | 0 | 50,000 | S.F | 50 |
| Event Facility | 1 space / 10 seats | 4 | 250 | Seats | 25 | 0 | Seats | 0 | 0 | Seats | 0 | 250 | Seats | 25 |
| Subtotal Commercial | | | | | 285 | | | 74 | | | 101 | | | 460 |
| Office | 1 space / 1,000 s.f | 3 | 0 | S.F | 0 | 0 | S.F | 0 | 0 | S.F | 0 | 0 | S.F | 0 |
| Condominiums 1 - Bed | 1 space / D.U | 5 | 220 | D.U | 220 | 575 | D.U | 575 | 374 | D.U | 374 | 1,169 | D.U | 1,169 |
| 2 - Bed | 1.25 spaces / D.U | 5 | 155 | D.U | 194 | 410 | D.U | 512 | 265 | D.U | 331 | 830 | D.U | 1,037 |
| 3 - Bed | 1.25 spaces / D.U | 5 | 25 | D.U | 31 | 63 | D.U | 79 | 41 | D.U | 51 | 129 | D.U | 161 |
| Subtotal Condominiums | | | 400 | D.U | 445 | 1,048 | D.U | 1,166 | 680 | D.U | 756 | 2,128 | D.U | 2,367 |
| Apartments 1 - Bed | 1 space / D.U | 6 | 70 | D.U | 70 | 197 | D.U | 197 | 128 | D.U | 128 | 395 | D.U | 395 |
| 2 - Bed | 1 space / D.U | 6 | 0 | D.U | 0 | 65 | D.U | 65 | 42 | D.U | 42 | 107 | D.U | 107 |
| 3 - Bed | 1 space / D.U | 6 | 30 | D.U | 30 | 0 | D.U | 0 | 0 | D.U | 0 | 30 | D.U | 30 |
| Subtotal Apartments | | | 100 | D.U | 100 | 262 | D.U | 262 | 170 | D.U | 170 | 532 | D.U | 532 |
| Subtotal Residential | | | 500 | D.U | 545 | 1,310 | D.U | 1,428 | 850 | D.U | 926 | 2,660 | D.U | 2,899 |
| **Grand Total** | | | | | 974 | | | 1,502 | | | 1,027 | | | 3,503 |

Footnotes:

1. One space for each two individual guest room for first 20 rooms + one additional parking space for each four guest rooms in excess of 20 but not exceeding 40 + one additional parking space for each six guest rooms in excess of 40. (LAMC 12.21 A.4.(p).(2) Exception for Central City Area).
2. LAMC 12.21 A.4.(i).(1) Exception - Downtown Business District.
3. LAMC 12.21 A.4.(i).(3) Exception - Downtown Business District.
4. LAMC 12.21 A.4.(i).(1) Exception - Downtown Business District.
5. LAMC 12.21 A.4. (p).(1) Exception for Central City Area.
6. LAMC 12.22 A.25. (d).(2) Affordable Housing Production Incentives.
7. Includes 10,000 sq. ft. restaurant space in Civic Park.

CALINE4 Model Output

Grand Avenue
CO Hotspot Selection
LOS Analysis

| No. | Intersection | Future NP AM | | Future WP AM | | AM | | | Future NP PM | | Future WP PM | | PM | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | V/C | LOS | V/C | LOS | V/C Increase % | LOS >=C? | Analyze? | V/C | LOS | V/C | LOS | V/C Increase % | LOS >=C? | Analyze? |
| 1 | Figueroa St. / 3rd St. | 0.827 | D | 0.837 | D | 1.2% | Yes | No | 0.965 | E | 0.985 | E | 2.1% | Yes | Yes |
| 2 | Figueroa St. / 5th St. | 0.487 | A | 0.492 | A | 1.0% | No | No | 0.781 | C | 0.795 | C | 1.8% | Yes | No |
| 3 | Figueroa St. / 6th St. | 0.626 | B | 0.632 | B | 1.0% | No | No | 0.650 | B | 0.658 | B | 1.2% | No | No |
| 4 | I-110 Off Ramp / Temple St. | 0.398 | A | 0.400 | A | 0.5% | No | No | 0.409 | A | 0.413 | A | 1.0% | No | No |
| 5 | Hope St. / Temple St. / US-101 Ramps | 0.902 | E | 0.921 | E | 2.1% | Yes | Yes | 0.971 | E | 1.015 | F | 4.5% | Yes | Yes |
| 6 | Hope St. / 1st St. | 0.925 | E | 0.935 | E | 1.1% | Yes | No | 0.733 | C | 0.830 | D | 13.2% | Yes | Yes |
| 7 | Hope St. / DTK Way / 2nd Place | 0.420 | A | 0.452 | A | 7.6% | No | No | 0.775 | C | 0.845 | D | 9.0% | Yes | Yes |
| 8 | Flower St. / 3rd St. | 0.671 | B | 0.678 | B | 1.0% | No | No | 0.548 | A | 0.569 | A | 4.2% | No | No |
| 9 | Flower St. / 5th St. | 0.439 | A | 0.448 | A | 2.1% | No | No | 0.517 | A | 0.535 | A | 3.5% | No | No |
| 10 | Flower St. / 6th St. | 0.528 | A | 0.540 | A | 2.3% | No | No | 0.498 | A | 0.515 | A | 3.4% | No | No |
| 11 | Grand Ave. / US-101 Ramps / I-110 Ramps | 0.691 | B | 0.724 | C | 4.5% | Yes | Yes | 0.994 | E | 1.100 | F | 10.7% | Yes | Yes |
| 12 | Grand Ave. / Temple St. | 0.930 | E | 0.929 | E | -0.1% | Yes | No | 0.844 | D | 0.896 | D | 6.2% | Yes | Yes |
| 13 | Grand Ave. / 1st St. | 0.791 | C | 0.818 | D | 3.4% | Yes | Yes | 0.850 | D | 0.918 | E | 8.0% | Yes | Yes |
| 14 | Grand Ave. / Upper 2nd St. | 0.537 | A | 0.670 | B | 24.8% | No | No | 0.564 | A | 0.708 | C | 25.5% | Yes | Yes |
| 15 | Grand Ave. / 5th St. | 0.487 | A | 0.502 | A | 3.1% | No | No | 0.565 | A | 0.597 | A | 5.7% | No | No |
| 16 | Olive St. / 1st St. | 0.531 | A | 0.609 | B | 14.7% | No | No | 0.627 | B | 0.801 | D | 27.8% | Yes | Yes |
| 17 | Olive St. / 2nd St. | 0.283 | A | 0.359 | A | 26.8% | No | No | 0.406 | A | 0.583 | A | 43.6% | No | No |
| 18 | Olive St. / 4th St. | 0.437 | A | 0.548 | A | 25.4% | No | No | 0.655 | B | 0.740 | C | 13.0% | Yes | Yes |
| 19 | Olive St. / 5th St. | 0.623 | B | 0.654 | B | 5.0% | No | No | 0.612 | D | 0.656 | D | 5.7% | Yes | Yes |
| 20 | Olive St. / 6th St. | 0.402 | A | 0.424 | A | 5.5% | No | No | 0.486 | A | 0.513 | A | 5.6% | No | No |
| 21 | Hill St. / Temple St. | 0.762 | C | 0.815 | D | 7.0% | Yes | Yes | 0.933 | E | 0.941 | E | 0.8% | Yes | No |
| 22 | Hill St. / 1st St. | 0.744 | C | 0.766 | C | 3.0% | Yes | Yes | 0.911 | E | 0.947 | E | 4.0% | Yes | Yes |
| 23 | Hill St. / 2nd St. | 0.765 | C | 0.793 | C | 3.7% | Yes | Yes | 0.670 | B | 0.845 | D | 26.1% | Yes | Yes |
| 24 | Hill St. / 3rd St. | 0.868 | E | 0.896 | E | 2.9% | Yes | Yes | 1.018 | F | 1.103 | F | 8.3% | Yes | Yes |
| 25 | Hill St. / 4th St. | 0.518 | A | 0.542 | A | 4.6% | No | No | 0.780 | C | 0.851 | D | 12.0% | Yes | Yes |
| 26 | Hill St. / 6th St. | 0.457 | A | 0.466 | A | 2.0% | No | No | 0.586 | A | 0.609 | B | 3.9% | No | No |
| 27 | Broadway / Temple St. | 0.858 | D | 0.895 | D | 4.3% | Yes | Yes | 0.834 | D | 0.866 | D | 3.8% | Yes | Yes |
| 28 | Broadway / 1st St. | 0.824 | D | 0.915 | E | 11.0% | Yes | Yes | 0.841 | D | 0.939 | E | 11.7% | Yes | Yes |
| 29 | Broadway / 2nd St. | 0.613 | B | 0.616 | B | 0.5% | No | No | 0.748 | C | 0.768 | C | 2.7% | Yes | Yes |
| 30 | Broadway / 4th St. | 0.474 | A | 0.489 | A | 3.2% | No | No | 0.646 | B | 0.676 | B | 5.0% | No | No |
| 31 | Spring St. / 1st St. | 0.592 | A | 0.609 | B | 2.9% | No | No | 0.582 | A | 0.622 | B | 6.9% | No | No |
| 32 | Spring St. / 2nd St. | 0.609 | B | 0.612 | B | 0.5% | No | No | 0.509 | A | 0.517 | A | 1.6% | No | No |

**CO Hotspot Analysis Criteria**
(Must meet both conditions)
1. V/C Increase >=2%
2. LOS >= C

## Grand Avenue (1 of 4)

CALINE4 Modeling Results and Estimated Local 1-Hour Carbon Monoxide Concentrations (ppm)

Projected Background 1-Hour CO Concentrations (ppm)[a]

Monitoring Station: Central LA

| Year | 1-Hr Concentration |
|---|---|
| 2015 | 5.1 |

| Intersection and Receptor Locations | Future Without Project | | Future With Project | | |
|---|---|---|---|---|---|
| | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Exceedance of Significance Threshold[d] |
| GRAND AVENUE AND 110/101 RAMPS AM | | | | | |
| NE | 0.8 | 5.9 | 0.8 | 5.9 | NO |
| SE | 0.8 | 5.9 | 0.8 | 5.9 | NO |
| SW | 1.2 | 6.3 | 1.2 | 6.3 | NO |
| NW | 1.0 | 6.1 | 0.9 | 6.0 | NO |
| GRAND AVENUE AND 110/101 RAMPS PM | | | | | |
| NE | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| SE | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| SW | 0.8 | 5.9 | 0.9 | 6.0 | NO |
| NW | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| GRAND AVENUE AND TEMPLE STREET AM | | | | | |
| NE | 1.2 | 6.3 | 1.2 | 6.3 | NO |
| SE | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| SW | 1.3 | 6.4 | 1.5 | 6.6 | NO |
| NW | 1.7 | 6.8 | 1.6 | 6.7 | NO |
| GRAND AVENUE AND TEMPLE STREET PM | | | | | |
| NE | 1.5 | 6.6 | 1.6 | 6.7 | NO |
| SE | 1.6 | 6.7 | 1.8 | 6.9 | NO |
| SW | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| NW | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| HOPE STREET AND 1ST STREET AM | | | | | |
| NE | 1.0 | 6.1 | 1.0 | 6.1 | NO |
| SE | 1.5 | 6.6 | 1.6 | 6.7 | NO |
| SW | 1.5 | 6.6 | 1.6 | 6.7 | NO |
| NW | 1.7 | 6.8 | 1.8 | 6.9 | NO |
| HOPE STREET AND 1ST STREET PM | | | | | |
| NE | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| SE | 1.5 | 6.6 | 1.6 | 6.7 | NO |
| SW | 1.4 | 6.5 | 1.4 | 6.5 | NO |
| NW | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| HOPE STREET AND GTK WAY / 2ND PLACE AM | | | | | |
| NE | 0.6 | 5.7 | 0.7 | 5.8 | NO |
| SE | 0.6 | 5.7 | 0.7 | 5.8 | NO |
| SW | 0.5 | 5.6 | 0.6 | 5.7 | NO |
| NW | 0.5 | 5.6 | 0.6 | 5.7 | NO |
| HOPE STREET AND GTK WAY / 2ND PLACE PM | | | | | |
| NE | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| SE | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| SW | 0.7 | 5.8 | 0.7 | 5.8 | NO |
| NW | 0.9 | 6.0 | 1.0 | 6.1 | NO |
| HOPE STREET AND TEMPLE STREET AM | | | | | |
| NE | 0.9 | 6.0 | 0.9 | 6.0 | NO |
| SE | 1.1 | 6.2 | 1.1 | 6.2 | NO |
| SW | 1.2 | 6.3 | 1.2 | 6.3 | NO |
| NW | 1.2 | 6.3 | 1.2 | 6.3 | NO |
| HOPE STREET AND TEMPLE STREET PM | | | | | |
| NE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SE | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| SW | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| NW | 0.9 | 6.0 | 1.0 | 6.1 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook

b The 1-hour traffic contribution (ppm) is determined by inputing total traffic volumes into the CALINE4 model.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 1-hour CO concentrations is 20 ppm.

## Grand Avenue (2 of 4)

CALINE4 Modeling Results and Estimated Local 1-Hour Carbon Monoxide Concentrations (ppm)

Projected Background 1-Hour CO Concentrations (ppm)[a]

Monitoring Station: Central LA

| Year | 1-Hr Concentration |
|---|---|
| 2015 | 5.1 |

| Intersection and Receptor Locations | Future Without Project | | Future With Project | | |
|---|---|---|---|---|---|
| | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Exceedance of Significance Threshold[d] |
| GRAND AVENUE AND 1ST STREET AM | | | | | |
| NE | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| SE | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| SW | 1.5 | 6.6 | 1.4 | 6.5 | NO |
| NW | 1.7 | 6.8 | 1.8 | 6.9 | NO |
| GRAND AVENUE AND 1ST STREET PM | | | | | |
| NE | 1.4 | 6.5 | 1.6 | 6.7 | NO |
| SE | 1.5 | 6.6 | 1.8 | 6.9 | NO |
| SW | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| NW | 1.6 | 6.7 | 1.8 | 6.9 | NO |
| HILL STREET AND TEMPLE STREET AM | | | | | |
| NE | 1.2 | 6.3 | 1.2 | 6.3 | NO |
| SE | 1.0 | 6.1 | 1.0 | 6.1 | NO |
| SW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| NW | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| HILL STREET AND TEMPLE STREET PM | | | | | |
| NE | 1.7 | 6.8 | 1.7 | 6.8 | NO |
| SE | 1.5 | 6.6 | 1.5 | 6.6 | NO |
| SW | 1.4 | 6.5 | 1.4 | 6.5 | NO |
| NW | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| OLIVE STREET AND 1ST STREET AM | | | | | |
| NE | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| SE | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| SW | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| NW | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| OLIVE STREET AND 1ST STREET PM | | | | | |
| NE | 1.5 | 6.6 | 1.9 | 7.0 | NO |
| SE | 1.3 | 6.4 | 1.7 | 6.8 | NO |
| SW | 1.3 | 6.4 | 1.6 | 6.7 | NO |
| NW | 1.4 | 6.5 | 1.8 | 6.9 | NO |
| OLIVE STREET AND 4TH STREET AM | | | | | |
| NE | 0.8 | 5.9 | 0.9 | 6.0 | NO |
| SE | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| SW | 0.7 | 5.8 | 0.8 | 5.9 | NO |
| NW | 0.7 | 5.8 | 0.8 | 5.9 | NO |
| OLIVE STREET AND 4TH STREET PM | | | | | |
| NE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SE | 1.2 | 6.3 | 1.4 | 6.5 | NO |
| SW | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| NW | 0.9 | 6.0 | 1.0 | 6.1 | NO |
| OLIVE STREET AND 5TH STREET AM | | | | | |
| NE | 1.0 | 6.1 | 1.0 | 6.1 | NO |
| SE | 0.9 | 6.0 | 1.0 | 6.1 | NO |
| SW | 0.9 | 6.0 | 0.9 | 6.0 | NO |
| NW | 0.9 | 6.0 | 0.9 | 6.0 | NO |
| OLIVE STREET AND 5TH STREET PM | | | | | |
| NE | 1.2 | 6.3 | 1.4 | 6.5 | NO |
| SE | 1.3 | 6.4 | 1.5 | 6.6 | NO |
| SW | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| NW | 1.1 | 6.2 | 1.2 | 6.3 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook

b The 1-hour traffic contribution (ppm) is determined by inputing total traffic volumes into the CALINE4 model.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 1-hour CO concentrations is 20 ppm.

## Grand Avenue (3 of 4)

CALINE4 Modeling Results and Estimated Local 1-Hour Carbon Monoxide Concentrations (ppm)

| Projected Background 1-Hour CO Concentrations (ppm)[a] | |
|---|---|
| Monitoring Station: Central LA | |
| Year | 1-Hr Concentration |
| 2015 | 5.1 |

| Intersection and Receptor Locations | Future Without Project | | Future With Project | | |
|---|---|---|---|---|---|
| | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Exceedance of Significance Threshold[d] |
| BROADWAY AND TEMPLE STREET AM | | | | | |
| NE | 1.1 | 6.2 | 1.1 | 6.2 | NO |
| SE | 1.1 | 6.2 | 1.1 | 6.2 | NO |
| SW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| NW | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| BROADWAY AND TEMPLE STREET PM | | | | | |
| NE | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| SE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SW | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| NW | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| HILL STREET AND 1ST STREET AM | | | | | |
| NE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SE | 1.0 | 6.1 | 1.2 | 6.3 | NO |
| SW | 1.4 | 6.5 | 1.4 | 6.5 | NO |
| NW | 1.4 | 6.5 | 1.7 | 6.8 | NO |
| HILL STREET AND 1ST STREET PM | | | | | |
| NE | 1.5 | 6.6 | 1.6 | 6.7 | NO |
| SE | 1.6 | 6.7 | 1.7 | 6.8 | NO |
| SW | 1.5 | 6.6 | 1.5 | 6.6 | NO |
| NW | 1.3 | 6.4 | 1.5 | 6.6 | NO |
| HILL STREET AND 2ND STREET AM | | | | | |
| NE | 1.0 | 6.1 | 1.0 | 6.1 | NO |
| SE | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| SW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| NW | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| HILL STREET AND 2ND STREET PM | | | | | |
| NE | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| SE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SW | 1.0 | 6.1 | 1.4 | 6.5 | NO |
| NW | 1.2 | 6.3 | 1.4 | 6.5 | NO |
| HILL STREET AND 3RD STREET AM | | | | | |
| NE | 1.9 | 7.0 | 1.9 | 7.0 | NO |
| SE | 1.8 | 6.9 | 1.9 | 7.0 | NO |
| SW | 1.8 | 6.9 | 1.8 | 6.9 | NO |
| NW | 1.9 | 7.0 | 2.1 | 7.2 | NO |
| HILL STREET AND 3RD STREET PM | | | | | |
| NE | 2.1 | 7.2 | 2.3 | 7.4 | NO |
| SE | 2.1 | 7.2 | 2.3 | 7.4 | NO |
| SW | 1.9 | 7.0 | 2.0 | 7.1 | NO |
| NW | 2.0 | 7.1 | 2.1 | 7.2 | NO |
| HILL STREET AND 4TH STREET AM | | | | | |
| NE | 0.9 | 6.0 | 1.0 | 6.1 | NO |
| SE | 0.9 | 6.0 | 0.9 | 6.0 | NO |
| SW | 1.2 | 6.3 | 1.2 | 6.3 | NO |
| NW | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| HILL STREET AND 4TH STREET PM | | | | | |
| NE | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| SE | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| SW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| NW | 1.2 | 6.3 | 1.3 | 6.4 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook

b The 1-hour traffic contribution (ppm) is determined by inputing total traffic volumes into the CALINE4 model.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 1-hour CO concentrations is 20 ppm.

## Grand Avenue (4 of 4)

CALINE4 Modeling Results and Estimated Local 1-Hour Carbon Monoxide Concentrations (ppm)

Projected Background 1-Hour CO Concentrations (ppm)[a]

Monitoring Station: Central LA

| Year | 1-Hr Concentration |
|---|---|
| 2015 | 5.1 |

| Intersection and Receptor Locations | Future Without Project | | Future With Project | | |
|---|---|---|---|---|---|
| | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Exceedance of Significance Threshold[d] |
| BROADWAY AND 1ST STREET AM | | | | | |
| NE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SE | 1.1 | 6.2 | 1.2 | 6.3 | NO |
| SW | 1.1 | 6.2 | 1.4 | 6.5 | NO |
| NW | 1.3 | 6.4 | 1.4 | 6.5 | NO |
| BROADWAY AND 1ST STREET PM | | | | | |
| NE | 1.4 | 6.5 | 1.6 | 6.7 | NO |
| SE | 1.5 | 6.6 | 1.6 | 6.7 | NO |
| SW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| NW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| BROADWAY AND 2ND STREET AM | | | | | |
| NE | 0.9 | 6.0 | 0.9 | 6.0 | NO |
| SE | 0.9 | 6.0 | 0.9 | 6.0 | NO |
| SW | 1.0 | 6.1 | 1.0 | 6.1 | NO |
| NW | 0.9 | 6.0 | 1.0 | 6.1 | NO |
| BROADWAY AND 2ND STREET PM | | | | | |
| NE | 1.3 | 6.4 | 1.3 | 6.4 | NO |
| SE | 1.1 | 6.2 | 1.1 | 6.2 | NO |
| SW | 1.0 | 6.1 | 1.0 | 6.1 | NO |
| NW | 1.1 | 6.2 | 1.1 | 6.2 | NO |
| FIGUREROA STREET AND 3RD STREET AM | | | | | |
| NE | 1.7 | 6.8 | 1.8 | 6.9 | NO |
| SE | 1.2 | 6.3 | 1.3 | 6.4 | NO |
| SW | 1.6 | 6.7 | 1.6 | 6.7 | NO |
| NW | 1.5 | 6.6 | 1.5 | 6.6 | NO |
| FIGUREROA STREET AND 3RD STREET PM | | | | | |
| NE | 2.6 | 7.7 | 2.7 | 7.8 | NO |
| SE | 2.0 | 7.1 | 2.0 | 7.1 | NO |
| SW | 1.4 | 6.5 | 1.5 | 6.6 | NO |
| NW | 2.2 | 7.3 | 2.3 | 7.4 | NO |
| GRAND AVENUE AND UPPER 2ND STREET AM | | | | | |
| NE | 0.4 | 5.5 | 0.5 | 5.6 | NO |
| SE | 0.4 | 5.5 | 0.5 | 5.6 | NO |
| SW | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| NW | 1.0 | 6.1 | 1.1 | 6.2 | NO |
| GRAND AVENUE AND UPPER 2ND STREET PM | | | | | |
| NE | 0.4 | 5.5 | 0.6 | 5.7 | NO |
| SE | 0.5 | 5.6 | 0.6 | 5.7 | NO |
| SW | 0.8 | 5.9 | 1.0 | 6.1 | NO |
| NW | 0.8 | 5.9 | 1.0 | 6.1 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook

b The 1-hour traffic contribution (ppm) is determined by inputing total traffic volumes into the CALINE4 model.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 1-hour CO concentrations is 20 ppm.

## Grand Avenue (1 of 4)

CALINE4 Modeling Results and Estimated Local 8-Hour Carbon Monoxide Concentrations (ppm)

| Projected Background 8-Hour CO Concentrations (ppm)[a] | |
|---|---|
| Monitoring Station: Central LA | Average Persistence Factor = 0.70 |
| Year: 2015 — 8-Hr Concentration: 4.6 | |

| Intersection and Receptor Locations | Future Without Project: Traffic CO Contribution[b] | Future Without Project: Estimated Local CO Concentration[c] | Future With Project: Traffic CO Contribution[b] | Future With Project: Estimated Local CO Concentration[c] | Future With Project: Exceedance of Significance Threshold[d] |
|---|---|---|---|---|---|
| GRAND AVENUE AND 110/101 RAMPS AM | | | | | |
| NE | 0.4 | 5.0 | 0.4 | 5.0 | NO |
| SE | 0.4 | 5.0 | 0.4 | 5.0 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| GRAND AVENUE AND 110/101 RAMPS PM | | | | | |
| NE | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| SE | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| SW | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| GRAND AVENUE AND TEMPLE STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.7 | 5.3 | 0.7 | 5.3 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.7 | 5.3 | NO |
| GRAND AVENUE AND TEMPLE STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| HOPE STREET AND 1ST STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| HOPE STREET AND 1ST STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SW | 0.7 | 5.3 | 0.7 | 5.3 | NO |
| NW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| HOPE STREET AND GTK WAY / 2ND PLACE AM | | | | | |
| NE | 0.3 | 4.9 | 0.3 | 4.9 | NO |
| SE | 0.3 | 4.9 | 0.4 | 5.0 | NO |
| SW | 0.3 | 4.9 | 0.3 | 4.9 | NO |
| NW | 0.3 | 4.9 | 0.3 | 4.9 | NO |
| HOPE STREET AND GTK WAY / 2ND PLACE PM | | | | | |
| NE | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.4 | 5.0 | 0.4 | 5.0 | NO |
| NW | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| HOPE STREET AND TEMPLE STREET AM | | | | | |
| NE | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| SE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| HOPE STREET AND TEMPLE STREET PM | | | | | |
| NE | 0.7 | 5.3 | 0.7 | 5.3 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook.

b The persistence factor is calculated as recommended in Table B.15 in the Transportation Project-Level Carbon Monoxide Protocol (Institute of Transportation Studies, UC Davis, Revised 1997). This is a generalized persistence factor likely to provide a conservative estimate in most situations.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 8-hour CO concentrations is 9 ppm.

## Grand Avenue (2 of 4)

CALINE4 Modeling Results and Estimated Local 8-Hour Carbon Monoxide Concentrations (ppm)

| Projected Background 8-Hour CO Concentrations (ppm)[a] | |
|---|---|
| Monitoring Station: Central LA | Average Persistence Factor = 0.70 |
| Year: 2015 — 8-Hr Concentration: 4.6 | |

| Intersection and Receptor Locations | Future Without Project: Traffic CO Contribution[b] | Future Without Project: Estimated Local CO Concentration[c] | Future With Project: Traffic CO Contribution[b] | Future With Project: Estimated Local CO Concentration[c] | Future With Project: Exceedance of Significance Threshold[d] |
|---|---|---|---|---|---|
| GRAND AVENUE AND 1ST STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| GRAND AVENUE AND 1ST STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.9 | 5.5 | 1.0 | 5.6 | NO |
| HILL STREET AND TEMPLE STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.7 | 5.3 | 0.7 | 5.3 | NO |
| HILL STREET AND TEMPLE STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SE | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| OLIVE STREET AND 1ST STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| OLIVE STREET AND 1ST STREET PM | | | | | |
| NE | 0.8 | 5.4 | 1.0 | 5.6 | NO |
| SE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 1.0 | 5.6 | NO |
| OLIVE STREET AND 4TH STREET AM | | | | | |
| NE | 0.4 | 5.0 | 0.5 | 5.1 | NO |
| SE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SW | 0.4 | 5.0 | 0.5 | 5.1 | NO |
| NW | 0.4 | 5.0 | 0.5 | 5.1 | NO |
| OLIVE STREET AND 4TH STREET PM | | | | | |
| NE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SE | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| SW | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| OLIVE STREET AND 5TH STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SW | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| NW | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| OLIVE STREET AND 5TH STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.6 | 5.2 | 0.7 | 5.3 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook.

b The persistence factor is calculated as recommended in Table B.15 in the Transportation Project-Level Carbon Monoxide Protocol (Institute of Transportation Studies, UC Davis, Revised 1997). This is a generalized persistence factor likely to provide a conservative estimate in most situations.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 8-hour CO concentrations is 9 ppm.

## Grand Avenue (3 of 4)

CALINE4 Modeling Results and Estimated Local 8-Hour Carbon Monoxide Concentrations (ppm)

| Projected Background 8-Hour CO Concentrations (ppm)[a] | | | |
|---|---|---|---|
| Monitoring Station: Central LA | | Average Persistence Factor = | 0.70 |
| Year | 8-Hr Concentration | | |
| 2015 | 4.6 | | |

| Intersection and Receptor Locations | Future Without Project | | Future With Project | | |
|---|---|---|---|---|---|
| | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Traffic CO Contribution[b] | Estimated Local CO Concentration[c] | Exceedance of Significance Threshold[d] |
| BROADWAY AND TEMPLE STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| BROADWAY AND TEMPLE STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SE | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| SW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| NW | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| HILL STREET AND 1ST STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| HILL STREET AND 1ST STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SW | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| NW | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| HILL STREET AND 2ND STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SE | 0.7 | 5.3 | 0.7 | 5.3 | NO |
| SW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| HILL STREET AND 2ND STREET PM | | | | | |
| NE | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.6 | 5.2 | 0.8 | 5.4 | NO |
| NW | 0.6 | 5.2 | 0.8 | 5.4 | NO |
| HILL STREET AND 3RD STREET AM | | | | | |
| NE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SW | 0.9 | 5.5 | 1.0 | 5.6 | NO |
| NW | 1.0 | 5.6 | 1.1 | 5.7 | NO |
| HILL STREET AND 3RD STREET PM | | | | | |
| NE | 0.9 | 5.5 | 1.0 | 5.6 | NO |
| SE | 0.9 | 5.5 | 1.0 | 5.6 | NO |
| SW | 1.0 | 5.6 | 1.1 | 5.7 | NO |
| NW | 1.1 | 5.7 | 1.1 | 5.7 | NO |
| HILL STREET AND 4TH STREET AM | | | | | |
| NE | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| SE | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| SW | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| NW | 0.5 | 5.1 | 0.6 | 5.2 | NO |
| HILL STREET AND 4TH STREET PM | | | | | |
| NE | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| SE | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.6 | 5.2 | 0.8 | 5.4 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook.

b The persistence factor is calculated as recommended in Table B.15 in the Transportation Project-Level Carbon Monoxide Protocol (Institute of Transportation Studies, UC Davis, Revised 1997). This is a generalized persistence factor likely to provide a conservative estimate in most situations.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 8-hour CO concentrations is 9 ppm.

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND TEMPLE STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 335 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 269 | 3.6 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 310 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 310 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 2125 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1854 | 3.9 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1860 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1860 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 894 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 753 | 4.3 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1140 | 3.3 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1140 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 833 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 795 | 4.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 877 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 877 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 66 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 271 | 3.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 141 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 38 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.2 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 350. | 1.0 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .0 | .2 | .8 | .0 | .0 |
| 4. NW3 | 173. | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .5 | .0 |
| 5. NE7 | 261. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 8. | 1.1 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 97. | 1.0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .5 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .4 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .1 | .1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AM & TEMPLE STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 347 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 281 | 3.6 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 322 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 322 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 2167 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1896 | 3.9 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 2001 | 2.8 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 2001 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | -23 | 500 | -23 | AG | 938 | 2.3 | .0 | 50.0 |
| J. WA | 500 | -23 | 0 | -23 | AG | 753 | 4.3 | .0 | 45.0 |
| K. WD | 0 | -23 | -500 | -23 | AG | 1140 | 3.3 | .0 | 33.0 |
| L. WE | -500 | -23 | -1500 | -23 | AG | 1140 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 888 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 850 | 4.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 877 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 877 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 66 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 271 | 3.8 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 185 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 38 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.2 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 350. | 1.0 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |
| 3. SW3 | 5. | 1.5 | .0 | .0 | .0 | .0 | .2 | .8 | .0 | .0 |
| 4. NW3 | 173. | 1.3 | .0 | .0 | .0 | .0 | .0 | .2 | .6 | .0 |
| 5. NE7 | 260. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 8. | 1.1 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 97. | 1.0 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .5 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .1 | .1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND TEMPLE STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1392 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1287 | 3.8 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1544 | 2.9 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1544 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1590 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1449 | 3.8 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1342 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1342 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1268 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1229 | 4.4 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1377 | 3.9 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1377 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 879 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 781 | 4.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 866 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 866 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 105 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 141 | 3.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 39 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 98 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 352. | 1.5 | .0 | .2 | .6 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 6. | 1.4 | .0 | .0 | .0 | .2 | .0 | .7 | .0 | .0 |
| 4. NW3 | 170. | 1.3 | .0 | .2 | .0 | .0 | .0 | .2 | .4 | .0 |
| 5. NE7 | 261. | 1.2 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 351. | 1.0 | .0 | .0 | .4 | .0 | .1 | .2 | .0 | .0 |
| 7. SW7 | 8. | 1.2 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 |
| 8. NW7 | 97. | 1.2 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .7 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .5 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND TEMPLE STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1418 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1313 | 3.8 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1570 | 2.9 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1570 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1619 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1478 | 3.8 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1377 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1377 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1271 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1229 | 4.4 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1377 | 4.0 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1377 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 882 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 784 | 4.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 866 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 866 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 105 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 141 | 3.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 42 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 98 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 352. | 1.5 | .0 | .2 | .6 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 6. | 1.4 | .0 | .0 | .0 | .2 | .0 | .7 | .0 | .0 |
| 4. NW3 | 170. | 1.3 | .0 | .2 | .0 | .0 | .0 | .2 | .4 | .0 |
| 5. NE7 | 261. | 1.2 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 279. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 8. | 1.2 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 |
| 8. NW7 | 97. | 1.2 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .7 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .5 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .2 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 1ST STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 8 | -1500 | 8 | -500 | AG | 616 | 2.3 | .0 | 50.0 |
| B. NA | 8 | -500 | 8 | 0 | AG | 332 | 5.2 | .0 | 33.0 |
| C. ND | 1800 | 0 | 1900 | 0 | AG | 0 | 3.3 | .0 | 33.0 |
| D. NE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 50.0 |
| E. SF | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| F. SA | 1800 | 0 | 1900 | 0 | AG | 0 | 5.2 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 556 | 5.3 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 556 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1546 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1314 | 3.3 | .0 | 45.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1598 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1598 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1185 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1185 | 3.3 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1193 | 2.5 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1193 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 284 | 5.2 | .0 | 33.0 |
| R. SL | 1900 | 0 | 1800 | 0 | AG | 0 | 5.2 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 232 | 3.3 | .0 | 33.0 |
| T. EL | 1900 | 0 | 1800 | 0 | AG | 0 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 63 | 6.0 |
| 2. SE3 | 33 | -63 | 6.0 |
| 3. SW3 | -33 | -63 | 6.0 |
| 4. NW3 | -33 | 63 | 6.0 |
| 5. NE7 | 46 | 76 | 6.0 |
| 6. SE7 | 46 | -76 | 6.0 |
| 7. SW7 | -46 | -76 | 6.0 |
| 8. NW7 | -46 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 |
| 2. SE3 | 276. | 1.1 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 81. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 175. | 1.3 | .0 | .1 | .0 | .0 | .0 | .0 | .5 | .0 |
| 5. NE7 | 189. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 6. SE7 | 277. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 79. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | 173. | 1.0 | .0 | .1 | .0 | .0 | .0 | .0 | .4 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 1ST STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 8 | -1500 | 8 | -500 | AG | 698 | 2.3 | .0 | 50.0 |
| B. NA | 8 | -500 | 8 | 0 | AG | 388 | 5.0 | .0 | 33.0 |
| C. ND | 1800 | 0 | 1900 | 0 | AG | 0 | 3.2 | .0 | 33.0 |
| D. NE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 50.0 |
| E. SF | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| F. SA | 1800 | 0 | 1900 | 0 | AG | 0 | 5.0 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 654 | 5.3 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 654 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1575 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1319 | 3.3 | .0 | 45.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1629 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1629 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1380 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1380 | 3.3 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1370 | 2.5 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1370 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 310 | 5.0 | .0 | 33.0 |
| R. SL | 1900 | 0 | 1800 | 0 | AG | 0 | 5.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 256 | 3.3 | .0 | 33.0 |
| T. EL | 1900 | 0 | 1800 | 0 | AG | 0 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 63 | 6.0 |
| 2. SE3 | 33 | -63 | 6.0 |
| 3. SW3 | -33 | -63 | 6.0 |
| 4. NW3 | -33 | 63 | 6.0 |
| 5. NE7 | 46 | 76 | 6.0 |
| 6. SE7 | 46 | -76 | 6.0 |
| 7. SW7 | -46 | -76 | 6.0 |
| 8. NW7 | -46 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 187. | 1.2 | .0 | .3 | .0 | .0 | .0 | .0 | .3 | .0 |
| 2. SE3 | 276. | 1.2 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 81. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 175. | 1.4 | .0 | .2 | .0 | .0 | .0 | .0 | .6 | .0 |
| 5. NE7 | 189. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 6. SE7 | 277. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 79. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | 173. | 1.1 | .0 | .1 | .0 | .0 | .0 | .0 | .4 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .2 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .2 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 1ST STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | ZO= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 8 | -1500 | 8 | -500 | AG | 1684 | 2.3 | .0 | 50.0 |
| B. NA | 8 | -500 | 8 | 0 | AG | 834 | 4.6 | .0 | 33.0 |
| C. ND | 1800 | 0 | 1900 | 0 | AG | 0 | 2.7 | .0 | 33.0 |
| D. NE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 50.0 |
| E. SF | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| F. SA | 1800 | 0 | 1900 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 218 | 2.7 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 218 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1550 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1442 | 3.8 | .0 | 45.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 2292 | 2.8 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 2292 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1142 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1142 | 3.5 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1866 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1866 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 850 | 4.6 | .0 | 33.0 |
| R. SL | 1900 | 0 | 1800 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 108 | 3.5 | .0 | 33.0 |
| T. EL | 1900 | 0 | 1800 | 0 | AG | 0 | 3.5 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. ME3 | 33 | 63 | 6.0 |
| 2. SE3 | 33 | -63 | 6.0 |
| 3. SW3 | -33 | -63 | 6.0 |
| 4. NW3 | -33 | 63 | 6.0 |
| 5. NE7 | 46 | 76 | 6.0 |
| 6. SE7 | 46 | -76 | 6.0 |
| 7. SW7 | -46 | -76 | 6.0 |
| 8. NW7 | -46 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. ME3 | 186. | 1.5 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 276. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 81. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 174. | 1.4 | .1 | .3 | .0 | .0 | .0 | .0 | .1 | .0 |
| 5. ME7 | 187. | 1.2 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 278. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 78. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 172. | 1.2 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. ME3 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 | .4 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .2 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .0 | .5 | .0 | .2 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .4 | .0 | .0 | .1 | .0 | .0 | .4 | .0 | .0 | .0 |
| 5. ME7 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 | .3 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 | .2 | .0 | .0 | .0 |
| 7. SW7 | .0 | .2 | .0 | .0 | .0 | .0 | .4 | .0 | .2 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 1ST STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 8 | -1500 | 8 | -500 | AG | 1995 | 2.3 | .0 | 50.0 |
| B. NA | 8 | -500 | 8 | 0 | AG | 978 | 4.8 | .0 | 33.0 |
| C. ND | 1800 | 0 | 1400 | 0 | AG | 0 | 2.7 | .0 | 33.0 |
| D. NE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 50.0 |
| E. SF | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| F. SA | 1800 | 0 | 1900 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 456 | 3.0 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 456 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1641 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1460 | 3.8 | .0 | 45.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 2477 | 2.8 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 2477 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1444 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1444 | 3.6 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 2147 | 2.7 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 2147 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 1017 | 4.8 | .0 | 33.0 |
| R. SL | 1900 | 0 | 1800 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 101 | 3.5 | .0 | 33.0 |
| T. EL | 1900 | 0 | 1800 | 0 | AG | 0 | 3.5 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 63 | 6.0 |
| 2. SE3 | 33 | -63 | 6.0 |
| 3. SW3 | -33 | -63 | 6.0 |
| 4. NW3 | -33 | 63 | 6.0 |
| 5. NE7 | 46 | 76 | 6.0 |
| 6. SE7 | 46 | -76 | 6.0 |
| 7. SW7 | -46 | -76 | 6.0 |
| 8. NW7 | -46 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | 1.9 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 276. | 1.7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 81. | 1.6 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 174. | 1.8 | .1 | .4 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 188. | 1.4 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 278. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 78. | 1.2 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 172. | 1.4 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .4 | .0 | .7 | .0 | .0 | .3 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .0 | .6 | .0 | .3 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .4 | .0 | .0 | .2 | .0 | .0 | .5 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .2 | .0 | .0 | .0 |
| 7. SW7 | .0 | .2 | .0 | .0 | .0 | .0 | .5 | .0 | .2 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .4 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 4TH STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1053 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1053 | 4.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1217 | 2.8 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1217 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 200 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 168 | 4.1 | .0 | 45.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 355 | 2.8 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 355 | 2.3 | .0 | 35.0 |
| I. WF | -1500 | -8 | -500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | -8 | 0 | -8 | AG | 0 | 3.6 | .0 | 33.0 |
| K. WD | 0 | -8 | 500 | -8 | AG | 0 | 2.5 | .0 | 33.0 |
| L. WE | 500 | -8 | 1500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | -8 | -500 | -8 | AG | 1563 | 2.3 | .0 | 80.0 |
| N. EA | -500 | -8 | 0 | -8 | AG | 1265 | 3.8 | .0 | 75.0 |
| O. ED | 0 | -8 | 500 | -8 | AG | 1244 | 2.6 | .0 | 60.0 |
| P. EE | 500 | -8 | 1500 | -8 | AG | 1244 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -38 | 500 | AG | 32 | 4.1 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 298 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | .8 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 275. | 1.0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 84. | .7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 173. | .7 | .1 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 259. | .6 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 8. | .6 | .0 | .0 | .0 | .1 | .0 | .1 | .0 | .0 |
| 8. NW7 | 169. | .6 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | .0 | .0 | .0 | .0 | .1 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 4TH STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1211 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1211 | 4.1 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1464 | 2.8 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1464 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 294 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 211 | 4.0 | .0 | 45.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 398 | 2.7 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 398 | 2.3 | .0 | 35.0 |
| I. WF | -1500 | -8 | -500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | -8 | 0 | -8 | AG | 0 | 3.8 | .0 | 33.0 |
| K. WD | 0 | -8 | 500 | -8 | AG | 0 | 2.6 | .0 | 33.0 |
| L. WE | 500 | -8 | 1500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | -8 | -500 | -8 | AG | 1690 | 2.3 | .0 | 80.0 |
| N. EA | -500 | -8 | 0 | -8 | AG | 1303 | 3.9 | .0 | 75.0 |
| O. ED | 0 | -8 | 500 | -8 | AG | 1333 | 2.6 | .0 | 60.0 |
| P. EE | 500 | -8 | 1500 | -8 | AG | 1333 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -38 | 500 | AG | 83 | 4.0 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.8 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 387 | 4.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | .9 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 275. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 6. | .8 | .0 | .0 | .0 | .2 | .0 | .1 | .0 | .0 |
| 4. NW3 | 173. | .8 | .1 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 259. | .7 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | .7 | .0 | .0 | .0 | .2 | .0 | .1 | .0 | .0 |
| 8. NW7 | 169. | .7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | .0 | .0 | .0 | .0 | .1 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | .0 | .0 | .0 | .0 | .1 | .4 | .0 | .0 | .0 | .0 | .0 | .1 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 4TH STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S  Z0= 100. CM  ALT= 0. (FT)
BRG= WORST CASE  VD= .0 CM/S
CLAS= 7 (G)  VS= .0 CM/S
MIXH= 1000. M  AMB= .0 PPM
SIGTH= 5. DEGREES  TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1814 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1814 | 4.1 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1647 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1647 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 326 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 244 | 3.6 | .0 | 45.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 340 | 2.5 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 340 | 2.3 | .0 | 35.0 |
| I. WF | -1500 | -8 | -500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | -8 | 0 | -8 | AG | 0 | 4.1 | .0 | 33.0 |
| K. WD | 0 | -8 | 500 | -8 | AG | 0 | 2.7 | .0 | 33.0 |
| L. WE | 500 | -8 | 1500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | -8 | -500 | -8 | AG | 1622 | 2.3 | .0 | 80.0 |
| N. EA | -500 | -8 | 0 | -8 | AG | 1477 | 4.1 | .0 | 75.0 |
| O. ED | 0 | -8 | 500 | -8 | AG | 1775 | 2.8 | .0 | 60.0 |
| P. EE | 500 | -8 | 1500 | -8 | AG | 1775 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -38 | 500 | AG | 82 | 3.6 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 145 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | 1.2 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 275. | 1.2 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 84. | 1.0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 170. | .9 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 |
| 5. NE7 | 188. | .9 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | 1.0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 83. | .7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 167. | .8 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .1 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .1 | .5 | .1 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .1 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 4TH STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 2026 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 2026 | 4.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1940 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1940 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 472 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 287 | 3.6 | .0 | 45.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 383 | 2.6 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 383 | 2.3 | .0 | 35.0 |
| I. WF | -1500 | -8 | -500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | -8 | 0 | -8 | AG | 0 | 4.1 | .0 | 33.0 |
| K. WD | 0 | -8 | 500 | -8 | AG | 0 | 2.7 | .0 | 33.0 |
| L. WE | 500 | -8 | 1500 | -8 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | -8 | -500 | -8 | AG | 1723 | 2.3 | .0 | 80.0 |
| N. EA | -500 | -8 | 0 | -8 | AG | 1497 | 4.3 | .0 | 75.0 |
| O. ED | 0 | -8 | 500 | -8 | AG | 1898 | 2.9 | .0 | 60.0 |
| P. EE | 500 | -8 | 1500 | -8 | AG | 1898 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -38 | 500 | AG | 185 | 3.6 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 226 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | 1.3 | .1 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 275. | 1.4 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 84. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 170. | 1.0 | .0 | .4 | .0 | .0 | .0 | .0 | .1 | .0 |
| 5. NE7 | 188. | 1.0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | 1.1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 83. | .8 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 167. | .8 | .0 | .4 | .0 | .0 | .0 | .0 | .1 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .1 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .1 | .5 | .1 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .1 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .4 | .1 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 5TH STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S
BRG= WORST CASE
CLAS= 7 (G)
MIXH= 1000. M
SIGTH= 5. DEGREES
Z0= 100. CM
VD= .0 CM/S
VS= .0 CM/S
AMB= .0 PPM
TEMP= 15.6 DEGREE (C)
ALT= 0. (FT)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1556 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1065 | 3.8 | .0 | 75.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1192 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1192 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 277 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 277 | 3.8 | .0 | 33.0 |
| G. SD | 1800 | 0 | 1900 | 0 | AG | 0 | 2.6 | .0 | 33.0 |
| H. SE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 1608 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1608 | 4.1 | .0 | 75.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 2249 | 2.7 | .0 | 75.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 2249 | 2.3 | .0 | 95.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.0 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.6 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 491 | 3.8 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.8 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.0 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 184. | 1.0 | .2 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 276. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 83. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 97. | .9 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | 186. | .8 | .1 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 99. | .7 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .5 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .3 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 5TH STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1710 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1219 | 3.6 | .0 | 75.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1350 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1350 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 320 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 320 | 3.6 | .0 | 33.0 |
| G. SD | 1800 | 0 | 1900 | 0 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 1627 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1627 | 4.1 | .0 | 75.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 2307 | 2.9 | .0 | 75.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 2307 | 2.3 | .0 | 95.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.1 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.6 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 491 | 3.6 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.6 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 184. | 1.0 | .2 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 276. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 83. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 97. | .9 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | 186. | .9 | .1 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 278. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 99. | .7 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .5 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .4 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 5TH STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 2375 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1687 | 3.5 | .0 | 75.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1755 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1755 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 462 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 462 | 3.4 | .0 | 33.0 |
| G. SD | 1800 | 0 | 1900 | 0 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 1593 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1593 | 4.4 | .0 | 75.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 2675 | 3.3 | .0 | 75.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 2675 | 2.3 | .0 | 95.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.8 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 688 | 3.5 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.2 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 277. | 1.3 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 82. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 170. | 1.1 | .0 | .3 | .0 | .0 | .0 | .1 | .0 | .0 |
| 5. NE7 | 186. | 1.1 | .2 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 278. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 168. | .9 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .7 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .7 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 |
| 3. SW3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .5 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: OLIVE STREET AND 5TH STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 2571 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1883 | 3.5 | .0 | 75.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1967 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1967 | 2.3 | .0 | 65.0 |
| E. SF | -38 | 1500 | -38 | 500 | AG | 505 | 2.3 | .0 | 35.0 |
| F. SA | -38 | 500 | -38 | 0 | AG | 505 | 3.5 | .0 | 33.0 |
| G. SD | 1800 | 0 | 1900 | 0 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | 1800 | 0 | 1900 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 1701 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1701 | 4.4 | .0 | 75.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 2810 | 3.9 | .0 | 75.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 2810 | 2.3 | .0 | 95.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.8 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. WL | 0 | 0 | 8 | -500 | AG | 688 | 3.5 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.4 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 277. | 1.5 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 82. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 170. | 1.2 | .0 | .3 | .0 | .0 | .0 | .1 | .0 | .0 |
| 5. NE7 | 261. | 1.1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 279. | 1.2 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 168. | 1.0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .9 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .9 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 |
| 3. SW3 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND TEMPLE STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 859 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 781 | 3.4 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 804 | 2.5 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 804 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1654 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1587 | 3.8 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1444 | 2.6 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1444 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 609 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 579 | 4.3 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 900 | 3.3 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 900 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 873 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 813 | 4.4 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 847 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 847 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 78 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 67 | 3.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 30 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 60 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.1 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .1 | .1 | .8 | .0 | .0 |
| 4. NW3 | 172. | 1.3 | .0 | .1 | .0 | .0 | .0 | .2 | .5 | .0 |
| 5. NE7 | 260. | .8 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 173. | .8 | .1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND TEMPLE STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | .H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 890 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 812 | 3.4 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 835 | 2.5 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 835 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1768 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1701 | 3.8 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1558 | 2.8 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1558 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 654 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 624 | 4.3 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 945 | 3.3 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 945 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 873 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 813 | 4.4 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 847 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 847 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 78 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 67 | 3.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 30 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 60 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.1 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 5. | 1.5 | .0 | .0 | .0 | .1 | .1 | .9 | .0 | .0 |
| 4. NW3 | 172. | 1.3 | .0 | .1 | .0 | .0 | .0 | .2 | .5 | .0 |
| 5. NE7 | 260. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 173. | .9 | .1 | .0 | .0 | .0 | .0 | .0 | .4 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND TEMPLE STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S  Z0= 100. CM  ALT= 0. (FT)
BRG= WORST CASE  VD= .0 CM/S
CLAS= 7 (G)  VS= .0 CM/S
MIXH= 1000. M  AMB= .0 PPM
SIGTH= 5. DEGREES  TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1794 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1649 | 3.6 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1765 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1765 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1155 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1101 | 3.6 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 929 | 2.6 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 929 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1007 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 978 | 4.3 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1289 | 3.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1289 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 847 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 760 | 4.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 820 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 820 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 0 | -500 | AG | 145 | 3.5 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 54 | 3.5 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 29 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 87 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.4 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 352. | 1.2 | .0 | .1 | .5 | .0 | .1 | .1 | .0 | .0 |
| 3. SW3 | 5. | 1.3 | .0 | .0 | .0 | .2 | .0 | .6 | .0 | .0 |
| 4. NW3 | 171. | 1.3 | .1 | .2 | .0 | .0 | .0 | .2 | .3 | .0 |
| 5. NE7 | 187. | 1.1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 278. | 1.0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | 1.0 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 |
| 8. NW7 | 169. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .6 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .1 | .1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND TEMPLE STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1865 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1720 | 3.6 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1836 | 2.6 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1836 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1249 | 3.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1195 | 3.6 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1023 | 2.5 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1023 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1010 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 981 | 4.4 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1292 | 3.8 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1292 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 847 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 760 | 4.4 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 820 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 820 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 145 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 54 | 3.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 29 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 87 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 48 | 6.0 |
| 2. SE3 | 55 | -48 | 6.0 |
| 3. SW3 | -55 | -48 | 6.0 |
| 4. NW3 | -55 | 48 | 6.0 |
| 5. NE7 | 68 | 61 | 6.0 |
| 6. SE7 | 68 | -61 | 6.0 |
| 7. SW7 | -68 | -61 | 6.0 |
| 8. NW7 | -68 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.5 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 352. | 1.3 | .0 | .2 | .5 | .0 | .1 | .1 | .0 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .2 | .0 | .6 | .0 | .0 |
| 4. NW3 | 171. | 1.4 | .1 | .3 | .0 | .0 | .0 | .2 | .3 | .0 |
| 5. NE7 | 187. | 1.1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 278. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 |
| 8. NW7 | 169. | 1.0 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .6 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .1 | .1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 1ST STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 381 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 323 | 4.1 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 445 | 2.7 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 445 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1643 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1559 | 4.3 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1661 | 3.3 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1661 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1528 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1399 | 3.8 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1563 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1563 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1193 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1102 | 3.8 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1076 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1076 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | -23 | -500 | AG | 58 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 84 | 4.1 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 129 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 91 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 350. | 1.0 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .0 | .1 | .7 | .0 | .0 |
| 4. NW3 | 173. | 1.4 | .0 | .0 | .0 | .0 | .0 | .2 | .6 | .0 |
| 5. NE7 | 254. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 97. | 1.1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 1ST STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 381 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 323 | 4.3 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 458 | 2.7 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 458 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1674 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1590 | 4.4 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1984 | 4.1 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1984 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1784 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1426 | 3.6 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1592 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1592 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1370 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1266 | 3.6 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1175 | 2.5 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1175 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 29 | -500 | AG | 58 | 4.3 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 84 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 350 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 104 | 3.5 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 276. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 3. SW3 | 81. | 1.4 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 4. NW3 | 173. | 1.7 | .0 | .0 | .0 | .0 | .0 | .2 | .9 | .0 |
| 5. NE7 | 191. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .3 | .0 |
| 6. SE7 | 278. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 7. SW7 | 7. | 1.2 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 167. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .6 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .1 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 1ST STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1016 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 950 | 4.3 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1327 | 3.9 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1327 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1421 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1338 | 4.3 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1319 | 2.8 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1319 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1534 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1468 | 3.8 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1559 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1559 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1866 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1524 | 3.8 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1632 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1632 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 66 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 83 | 4.1 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 66 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 342 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.5 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 352. | 1.6 | .0 | .2 | .6 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 6. | 1.5 | .0 | .0 | .0 | .2 | .0 | .7 | .0 | .0 |
| 4. NW3 | 171. | 1.3 | .0 | .1 | .0 | .0 | .0 | .2 | .4 | .0 |
| 5. NE7 | 255. | 1.2 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 349. | 1.2 | .0 | .0 | .5 | .0 | .0 | .3 | .0 | .0 |
| 7. SW7 | 9. | 1.2 | .0 | .0 | .1 | .1 | .0 | .5 | .0 | .0 |
| 8. NW7 | 98. | 1.2 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 1ST STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1016 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 950 | 4.3 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1354 | 4.1 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1354 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1450 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1367 | 4.3 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1469 | 3.0 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1469 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1714 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1551 | 3.6 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1649 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1649 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 2147 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1778 | 3.6 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1855 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1855 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | -23 | -500 | AG | 66 | 4.3 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 83 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 163 | 3.5 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 369 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.6 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 352. | 1.7 | .0 | .2 | .7 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 81. | 1.5 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 172. | 1.5 | .0 | .1 | .0 | .0 | .0 | .2 | .5 | .0 |
| 5. NE7 | 255. | 1.3 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 349. | 1.3 | .0 | .0 | .5 | .0 | .0 | .3 | .0 | .0 |
| 7. SW7 | 9. | 1.3 | .0 | .0 | .1 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 98. | 1.3 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .2 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .2 | .0 | .0 | .0 | .2 | .5 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 2ND STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 458 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 395 | 3.8 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 369 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 369 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1673 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1628 | 3.9 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 2103 | 2.9 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 2103 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 535 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 456 | 4.0 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 635 | 2.7 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 635 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 1199 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 1199 | 4.8 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 758 | 2.7 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 758 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 63 | 3.8 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 45 | 3.8 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 79 | 4.0 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 0 | 4.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .0 | .1 | .8 | .0 | .0 |
| 4. NW3 | 173. | 1.3 | .0 | .0 | .0 | .0 | .0 | .1 | .7 | .0 |
| 5. NE7 | 261. | .8 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 277. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 7. | 1.0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 172. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .2 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 2ND STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 554 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 474 | 3.6 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 504 | 2.6 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 504 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1758 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1713 | 3.9 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 2181 | 2.8 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 2181 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 650 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 571 | 4.1 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 718 | 2.8 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 718 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 1199 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 1199 | 5.0 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 758 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 758 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 80 | 3.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 45 | 3.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 79 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 0 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 276. | 1.3 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 5. | 1.5 | .0 | .0 | .0 | .0 | .1 | .8 | .0 | .0 |
| 4. NW3 | 173. | 1.3 | .0 | .0 | .0 | .0 | .0 | .1 | .7 | .0 |
| 5. NE7 | 261. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 277. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 172. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .3 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .1 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 2ND STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1304 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1110 | 3.6 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1000 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1000 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1331 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1282 | 3.5 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1519 | 2.5 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1519 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 883 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 830 | 4.6 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 1017 | 3.1 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 1017 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 724 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 724 | 4.6 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 706 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 706 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | -23 | -500 | AG | 194 | 3.5 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 49 | 3.5 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 53 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | 1.3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .2 |
| 2. SE3 | 276. | 1.2 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 82. | 1.0 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 172. | 1.2 | .1 | .1 | .0 | .0 | .0 | .0 | .5 | .0 |
| 5. NE7 | 187. | 1.0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .2 |
| 6. SE7 | 277. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | .9 | .0 | .0 | .0 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 171. | .9 | .1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .1 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .3 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 2ND STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1379 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1134 | 3.6 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1041 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1041 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1690 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1641 | 3.6 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1857 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1857 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 1074 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 1021 | 5.0 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 1263 | 3.8 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 1263 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 724 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 724 | 4.6 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 706 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 706 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 245 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 49 | 3.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 53 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | 1.4 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .2 |
| 2. SE3 | 276. | 1.3 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .1 | .1 | .7 | .0 | .0 |
| 4. NW3 | 170. | 1.4 | .0 | .2 | .0 | .0 | .0 | .1 | .5 | .0 |
| 5. NE7 | 187. | 1.1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .2 |
| 6. SE7 | 278. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 |
| 8. NW7 | 97. | 1.1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .2 | .1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 3RD STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 493 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 441 | 3.8 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 560 | 2.6 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 560 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1881 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1881 | 4.3 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 2015 | 2.9 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 2015 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 2137 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1750 | 4.6 | .0 | 45.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 1936 | 5.0 | .0 | 33.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 1936 | 2.3 | .0 | 50.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.0 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.6 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 52 | 3.8 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.8 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 387 | 4.1 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 25 | 6.0 |
| 2. SE3 | 55 | -25 | 6.0 |
| 3. SW3 | -55 | -25 | 6.0 |
| 4. NW3 | -55 | 25 | 6.0 |
| 5. NE7 | 68 | 38 | 6.0 |
| 6. SE7 | 68 | -38 | 6.0 |
| 7. SW7 | -68 | -38 | 6.0 |
| 8. NW7 | -68 | 38 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.9 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 277. | 1.8 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 85. | 1.8 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 95. | 1.9 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 |
| 5. NE7 | 263. | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 277. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 83. | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 8. NW7 | 97. | 1.4 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .3 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .3 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | .1 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 3RD STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 556 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 504 | 3.8 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 656 | 2.6 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 656 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1959 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1959 | 4.6 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 2078 | 2.9 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 2078 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 2174 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1787 | 4.8 | .0 | 45.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 1955 | 5.0 | .0 | 33.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 1955 | 2.3 | .0 | 50.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.0 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.6 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 52 | 3.8 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.8 | .0 | 33.0 |
| S. WL | 0 | 0 | 600 | 8 | AG | 387 | 4.3 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 25 | 6.0 |
| 2. SE3 | 55 | -25 | 6.0 |
| 3. SW3 | -55 | -25 | 6.0 |
| 4. NW3 | -55 | 25 | 6.0 |
| 5. NE7 | 68 | 38 | 6.0 |
| 6. SE7 | 68 | -38 | 6.0 |
| 7. SW7 | -68 | -38 | 6.0 |
| 8. NW7 | -68 | 38 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.9 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 277. | 1.9 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 7. | 1.8 | .0 | .0 | .0 | .0 | .0 | 1.0 | .0 | .0 |
| 4. NW3 | 95. | 2.1 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 5. NE7 | 263. | 1.2 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |
| 6. SE7 | 277. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 83. | 1.4 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 8. NW7 | 97. | 1.5 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .3 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .3 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .1 | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 5. NE7 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 3RD STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1256 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1086 | 3.8 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1242 | 2.6 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1242 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1609 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1609 | 3.9 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1505 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1505 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 2110 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1856 | 5.2 | .0 | 45.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 2228 | 5.2 | .0 | 33.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 2228 | 2.3 | .0 | 50.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.1 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.7 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 170 | 3.6 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 0 | AG | 254 | 4.3 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 25 | 6.0 |
| 2. SE3 | 55 | -25 | 6.0 |
| 3. SW3 | -55 | -25 | 6.0 |
| 4. NW3 | -55 | 25 | 6.0 |
| 5. NE7 | 68 | 38 | 6.0 |
| 6. SE7 | 68 | -38 | 6.0 |
| 7. SW7 | -68 | -38 | 6.0 |
| 8. NW7 | -68 | 38 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 2.1 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 277. | 2.1 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 85. | 1.9 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 95. | 2.0 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |
| 5. NE7 | 261. | 1.3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 279. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 83. | 1.4 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | 97. | 1.5 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .4 | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .4 | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | .1 | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 8. NW7 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 3RD STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1300 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1130 | 3.0 | .0 | 45.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 1318 | 2.7 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 1318 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1947 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1947 | 4.0 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1796 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1796 | 2.3 | .0 | 65.0 |
| I. WF | 1500 | 0 | 500 | 0 | AG | 2159 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 0 | 0 | 0 | AG | 1905 | 5.2 | .0 | 45.0 |
| K. WD | 0 | 0 | -500 | 0 | AG | 2292 | 5.3 | .0 | 33.0 |
| L. WE | -500 | 0 | -1500 | 0 | AG | 2292 | 2.3 | .0 | 50.0 |
| M. EF | 1500 | 0 | 500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| N. EA | 500 | 0 | 0 | 0 | AG | 0 | 4.1 | .0 | 33.0 |
| O. ED | 0 | 0 | -500 | 0 | AG | 0 | 2.7 | .0 | 33.0 |
| P. EE | -500 | 0 | -1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 23 | -500 | AG | 170 | 3.5 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.5 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 254 | 4.3 | .0 | 33.0 |
| T. EL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 25 | 6.0 |
| 2. SE3 | 55 | -25 | 6.0 |
| 3. SW3 | -55 | -25 | 6.0 |
| 4. NW3 | -55 | 25 | 6.0 |
| 5. NE7 | 68 | 38 | 6.0 |
| 6. SE7 | 68 | -38 | 6.0 |
| 7. SW7 | -68 | -38 | 6.0 |
| 8. NW7 | -68 | 38 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 2.3 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 277. | 2.3 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 85. | 2.0 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 95. | 2.1 | .0 | .0 | .1 | .0 | .0 | .4 | .0 | .0 |
| 5. NE7 | 261. | 1.4 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 279. | 1.4 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 83. | 1.5 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | 97. | 1.6 | .0 | .0 | .1 | .0 | .0 | .4 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .4 | 1.4 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .4 | 1.4 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | .1 | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | .0 | .0 | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 8. NW7 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 4TH STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 525 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 525 | 3.4 | .0 | 33.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 438 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 438 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1727 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1584 | 3.5 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1708 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1708 | 2.3 | .0 | 65.0 |
| I. WF | -1500 | 0 | -500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | 0 | 0 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| K. WD | 0 | 0 | 500 | 0 | AG | 0 | 2.8 | .0 | 33.0 |
| L. WE | 500 | 0 | 1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 1212 | 2.3 | .0 | 80.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 1212 | 4.4 | .0 | 60.0 |
| O. ED | 0 | 0 | 500 | 0 | AG | 1318 | 2.8 | .0 | 60.0 |
| P. EE | 500 | 0 | 1500 | 0 | AG | 1318 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 143 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 277. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 5. | 1.2 | .0 | .0 | .0 | .0 | .1 | .7 | .0 | .0 |
| 4. NW3 | 173. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 5. NE7 | 262. | .7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | .9 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 173. | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 47TH STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 589 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 589 | 3.4 | .0 | 33.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 502 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 502 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1789 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1633 | 3.5 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1763 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1763 | 2.3 | .0 | 65.0 |
| I. WF | -1500 | 0 | -500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | 0 | 0 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| K. WD | 0 | 0 | 500 | 0 | AG | 0 | 2.8 | .0 | 33.0 |
| L. WE | 500 | 0 | 1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 1300 | 2.3 | .0 | 80.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 1300 | 4.4 | .0 | 60.0 |
| O. ED | 0 | 0 | 500 | 0 | AG | 1413 | 3.0 | .0 | 60.0 |
| P. EE | 500 | 0 | 1500 | 0 | AG | 1413 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -8 | 500 | AG | 156 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 277. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 5. | 1.2 | .0 | .0 | .0 | .0 | .1 | .7 | .0 | .0 |
| 4. NW3 | 173. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 5. NE7 | 262. | .8 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | 1.0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 173. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 4TH STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1010 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1010 | 3.9 | .0 | 33.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 864 | 2.5 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 864 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1636 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1372 | 3.6 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1513 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1513 | 2.3 | .0 | 65.0 |
| I. WF | -1500 | 0 | -500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | 0 | 0 | 0 | AG | 0 | 4.1 | .0 | 33.0 |
| K. WD | 0 | 0 | 500 | 0 | AG | 0 | 2.7 | .0 | 33.0 |
| L. WE | 500 | 0 | 1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 1800 | 2.3 | .0 | 80.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 1800 | 4.8 | .0 | 60.0 |
| O. ED | 0 | 0 | 500 | 0 | AG | 2069 | 2.9 | .0 | 60.0 |
| P. EE | 500 | 0 | 1500 | 0 | AG | 2069 | 2.3 | .0 | 80.0 |
| Q. NL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.5 | .0 | 33.0 |
| R. SL | 0 | 0 | -N | 500 | AG | 264 | 3.6 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 0 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 277. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .1 | .1 | .6 | .0 | .0 |
| 4. NW3 | 172. | 1.2 | .1 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 5. NE7 | 261. | 1.0 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 279. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 8. | 1.1 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 172. | .9 | .1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HILL STREET AND 4TH STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 30 | -1500 | 30 | -500 | AG | 1054 | 2.3 | .0 | 50.0 |
| B. NA | 30 | -500 | 30 | 0 | AG | 1054 | 3.0 | .0 | 33.0 |
| C. ND | 30 | 0 | 30 | 500 | AG | 908 | 2.6 | .0 | 33.0 |
| D. NE | 30 | 500 | 30 | 1500 | AG | 908 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1927 | 2.3 | .0 | 65.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1569 | 3.6 | .0 | 60.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1721 | 2.6 | .0 | 45.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1721 | 2.3 | .0 | 65.0 |
| I. WF | -1500 | 0 | -500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | -500 | 0 | 0 | 0 | AG | 0 | 4.3 | .0 | 33.0 |
| K. WD | 0 | 0 | 500 | 0 | AG | 0 | 2.7 | .0 | 33.0 |
| L. WE | 500 | 0 | 1500 | 0 | AG | 0 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 1922 | 2.3 | .0 | 80.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 1922 | 4.8 | .0 | 60.0 |
| O. ED | 0 | 0 | 500 | 0 | AG | 2274 | 3.5 | .0 | 60.0 |
| P. EE | 500 | 0 | 1500 | 0 | AG | 2274 | 2.3 | .0 | 80.0 |
| Q. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.5 | .0 | 33.0 |
| R. SL | 0 | 0 | -W | 500 | AG | 358 | 3.6 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 263. | 1.4 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 277. | 1.4 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 6. | 1.5 | .0 | .0 | .0 | .1 | .1 | .7 | .0 | .0 |
| 4. NW3 | 172. | 1.3 | .1 | .0 | .0 | .0 | .0 | .1 | .5 | .0 |
| 5. NE7 | 261. | 1.1 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 279. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 8. | 1.2 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 |
| 8. NW7 | 98. | 1.1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 1ST STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 928 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 844 | 4.0 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1016 | 2.7 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1016 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1245 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1171 | 4.3 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1140 | 3.1 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1140 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1529 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1423 | 3.9 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1529 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1529 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1084 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 971 | 3.8 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1101 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1101 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 84 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 74 | 4.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 106 | 3.8 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 113 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.2 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 350. | 1.1 | .0 | .1 | .3 | .0 | .0 | .2 | .0 | .0 |
| 3. SW3 | 81. | 1.1 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 172. | 1.3 | .0 | .1 | .0 | .0 | .0 | .3 | .4 | .0 |
| 5. NE7 | 188. | .9 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 278. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | 1.0 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 |
| 8. NW7 | 97. | 1.1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .2 | .0 | .0 | .0 | .1 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 1ST STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 928 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 844 | 4.1 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1047 | 2.7 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1047 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1358 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1284 | 4.3 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1152 | 3.2 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1152 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1683 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1577 | 3.9 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1784 | 2.7 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1784 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1187 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1043 | 3.8 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1173 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1173 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 84 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 74 | 4.1 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 106 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 144 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 350. | 1.2 | .0 | .1 | .3 | .0 | .0 | .2 | .0 | .0 |
| 3. SW3 | 5. | 1.4 | .0 | .0 | .0 | .1 | .0 | .7 | .0 | .0 |
| 4. NW3 | 172. | 1.4 | .0 | .1 | .0 | .0 | .0 | .3 | .5 | .0 |
| 5. NE7 | 254. | 1.0 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 278. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | 1.1 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 |
| 8. NW7 | 97. | 1.2 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .4 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 1ST STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S  Z0= 100. CM  ALT= 0. (FT)
BRG= WORST CASE  VD= .0 CM/S
CLAS= 7 (G)  VS= .0 CM/S
MIXH= 1000. M  AMB= .0 PPM
SIGTH= 5. DEGREES  TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1622 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1541 | 4.3 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1707 | 3.1 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1707 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 961 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 922 | 4.1 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 966 | 2.8 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 966 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1504 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1362 | 3.8 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1503 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1503 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1645 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1370 | 3.8 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1556 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1556 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 81 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 39 | 4.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 142 | 3.8 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 275 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.4 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 352. | 1.5 | .0 | .2 | .6 | .0 | .0 | .1 | .0 | .0 |
| 3. SW3 | 81. | 1.4 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 171. | 1.4 | .0 | .3 | .0 | .0 | .0 | .2 | .3 | .0 |
| 5. NE7 | 187. | 1.2 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 278. | 1.2 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 8. | 1.1 | .0 | .0 | .1 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 98. | 1.1 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .4 | .0 | .1 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .2 | .5 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 1ST STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1622 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1541 | 4.3 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1778 | 3.3 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1778 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1056 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1017 | 4.1 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1005 | 2.9 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1005 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 30 | 500 | 30 | AG | 1629 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 30 | 0 | 30 | AG | 1487 | 3.9 | .0 | 60.0 |
| K. WD | 0 | 30 | -500 | 30 | AG | 1684 | 2.7 | .0 | 45.0 |
| L. WE | -500 | 30 | -1500 | 30 | AG | 1684 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1868 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1522 | 3.9 | .0 | 60.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1708 | 2.7 | .0 | 45.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1708 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 81 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 39 | 4.1 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 142 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 346 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 63 | 6.0 |
| 2. SE3 | 55 | -63 | 6.0 |
| 3. SW3 | -55 | -63 | 6.0 |
| 4. NW3 | -55 | 63 | 6.0 |
| 5. NE7 | 68 | 76 | 6.0 |
| 6. SE7 | 68 | -76 | 6.0 |
| 7. SW7 | -68 | -76 | 6.0 |
| 8. NW7 | -68 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.6 | .0 | .0 | .3 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 352. | 1.6 | .0 | .2 | .6 | .0 | .0 | .1 | .0 | .0 |
| 3. SW3 | 81. | 1.5 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 171. | 1.5 | .0 | .3 | .0 | .0 | .0 | .2 | .3 | .0 |
| 5. NE7 | 188. | 1.3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 278. | 1.3 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 8. | 1.2 | .0 | .0 | .1 | .2 | .0 | .4 | .0 | .0 |
| 8. NW7 | 98. | 1.2 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .2 | .0 | .0 | .0 | .2 | .5 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 2ND STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 989 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 952 | 3.5 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 919 | 2.5 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 919 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1039 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 993 | 3.5 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1040 | 2.5 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1040 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 533 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 508 | 4.4 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 535 | 2.8 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 535 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 719 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 687 | 4.4 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 786 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 786 | 2.3 | .0 | 50.0 |
| Q. WL | 0 | 0 | 8 | -500 | AG | 37 | 3.5 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 46 | 3.5 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 25 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 32 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | .9 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | 275. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 5. | 1.0 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 |
| 4. NW3 | 172. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .4 | .0 |
| 5. NE7 | 187. | .7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 277. | .7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | .8 | .0 | .0 | .0 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 97. | .7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 2ND STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 989 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 952 | 3.5 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 919 | 2.5 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 919 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 1052 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 1006 | 3.6 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 1040 | 2.6 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 1040 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 635 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 610 | 4.3 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 650 | 2.8 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 650 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 719 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 687 | 4.3 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 786 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 786 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 37 | 3.5 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 46 | 3.5 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 25 | 4.1 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 32 | 4.1 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | .9 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | 275. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 5. | 1.0 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 |
| 4. NW3 | 172. | 1.0 | .0 | .1 | .0 | .0 | .0 | .1 | .4 | .0 |
| 5. NE7 | 187. | .7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 277. | .7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | .8 | .0 | .0 | .0 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 97. | .7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 2ND STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1725 | 2.3 | .0 | 65.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1577 | 3.6 | .0 | 60.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1614 | 2.5 | .0 | 45.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1614 | 2.3 | .0 | 65.0 |
| E. SF | -30 | 1500 | -30 | 500 | AG | 819 | 2.3 | .0 | 50.0 |
| F. SA | -30 | 500 | -30 | 0 | AG | 781 | 3.5 | .0 | 45.0 |
| G. SD | -30 | 0 | -30 | -500 | AG | 863 | 2.5 | .0 | 33.0 |
| H. SE | -30 | -500 | -30 | -1500 | AG | 863 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 794 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 748 | 4.6 | .0 | 33.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 887 | 2.9 | .0 | 33.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 887 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -15 | -500 | -15 | AG | 720 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -15 | 0 | -15 | AG | 617 | 4.4 | .0 | 33.0 |
| O. ED | 0 | -15 | 500 | -15 | AG | 702 | 2.9 | .0 | 33.0 |
| P. EE | 500 | -15 | 1500 | -15 | AG | 702 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 8 | -500 | AG | 148 | 3.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -23 | 500 | AG | 38 | 3.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 46 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -8 | AG | 111 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 55 | 40 | 6.0 |
| 2. SE3 | 55 | -40 | 6.0 |
| 3. SW3 | -55 | -40 | 6.0 |
| 4. NW3 | -55 | 40 | 6.0 |
| 5. NE7 | 68 | 53 | 6.0 |
| 6. SE7 | 68 | -53 | 6.0 |
| 7. SW7 | -68 | -53 | 6.0 |
| 8. NW7 | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | 1.3 | .1 | .7 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | 352. | 1.1 | .0 | .1 | .5 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 83. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 4. NW3 | 171. | 1.1 | .1 | .2 | .0 | .0 | .0 | .0 | .3 | .0 |
| 5. NE7 | 187. | 1.0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 277. | .9 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 8. NW7 | 169. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .2 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: BROADWAY AND 2ND STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | * | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | * TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|---|
| A. NF | * | 23 | -1500 | 23 | -500 | * AG | 1725 | 2.3 | .0 | 65.0 |
| B. NA | * | 23 | -500 | 23 | 0 | * AG | 1577 | 3.6 | .0 | 60.0 |
| C. ND | * | 23 | 0 | 23 | 500 | * AG | 1614 | 2.6 | .0 | 45.0 |
| D. NE | * | 23 | 500 | 23 | 1500 | * AG | 1614 | 2.3 | .0 | 65.0 |
| E. SF | * | -30 | 1500 | -30 | 500 | * AG | 857 | 2.3 | .0 | 50.0 |
| F. SA | * | -30 | 500 | -30 | 0 | * AG | 819 | 3.6 | .0 | 45.0 |
| G. SD | * | -30 | 0 | -30 | -500 | * AG | 863 | 2.5 | .0 | 33.0 |
| H. SE | * | -30 | -500 | -30 | -1500 | * AG | 863 | 2.3 | .0 | 50.0 |
| I. WF | * | 1500 | 15 | 500 | 15 | * AG | 946 | 2.3 | .0 | 50.0 |
| J. WA | * | 500 | 15 | 0 | 15 | * AG | 900 | 4.8 | .0 | 33.0 |
| K. WD | * | 0 | 15 | -500 | 15 | * AG | 1077 | 3.0 | .0 | 33.0 |
| L. WE | * | -500 | 15 | -1500 | 15 | * AG | 1077 | 2.3 | .0 | 50.0 |
| M. EF | * | -1500 | -15 | -500 | -15 | * AG | 728 | 2.3 | .0 | 50.0 |
| N. EA | * | -500 | -15 | 0 | -15 | * AG | 617 | 4.3 | .0 | 33.0 |
| O. ED | * | 0 | -15 | 500 | -15 | * AG | 702 | 2.8 | .0 | 33.0 |
| P. EE | * | 500 | -15 | 1500 | -15 | * AG | 702 | 2.3 | .0 | 50.0 |
| Q. NL | * | 0 | 0 | 8 | -500 | * AG | 148 | 3.5 | .0 | 33.0 |
| R. SL | * | 0 | 0 | -23 | 500 | * AG | 38 | 3.5 | .0 | 33.0 |
| S. WL | * | 0 | 0 | 500 | 8 | * AG | 46 | 4.3 | .0 | 33.0 |
| T. EL | * | 0 | 0 | -500 | -8 | * AG | 111 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | * | COORDINATES (FT) X | Y | Z |
|---|---|---|---|---|
| 1. NE3 | * | 55 | 40 | 6.0 |
| 2. SE3 | * | 55 | -40 | 6.0 |
| 3. SW3 | * | -55 | -40 | 6.0 |
| 4. NW3 | * | -55 | 40 | 6.0 |
| 5. NE7 | * | 68 | 53 | 6.0 |
| 6. SE7 | * | 68 | -53 | 6.0 |
| 7. SW7 | * | -68 | -53 | 6.0 |
| 8. NW7 | * | -68 | 53 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | * | BRG (DEG) | * PRED CONC (PPM) | * | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | * | 185. | * 1.3 | * | .1 | .7 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | * | 352. | * 1.1 | * | .0 | .1 | .5 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | * | 82. | * 1.0 | * | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 4. NW3 | * | 171. | * 1.1 | * | .1 | .2 | .0 | .0 | .0 | .0 | .3 | .0 |
| 5. NE7 | * | 187. | * 1.0 | * | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | * | 277. | * .9 | * | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | * | 81. | * .8 | * | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 8. NW7 | * | 97. | * .9 | * | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | * | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | * | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | * | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | * | .0 | .3 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | * | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | * | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | * | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | * | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | * | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND TEMPLE STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1278 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1019 | 4.4 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1407 | 4.3 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1407 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 323 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 184 | 4.3 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 551 | 2.8 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 581 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1259 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1026 | 3.5 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1094 | 2.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1094 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1310 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 871 | 3.5 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 1118 | 2.6 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 1118 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 259 | 4.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 139 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 233 | 3.5 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 439 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.3 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 353. | 1.4 | .0 | .2 | .8 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 82. | 1.2 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 171. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 187. | 1.0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 352. | 1.0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .8 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 97. | .9 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .2 | .0 | .0 | .0 | .1 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND TEMPLE STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1161 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 903 | 4.4 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1287 | 3.9 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1287 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 252 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 113 | 4.3 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 490 | 2.8 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 480 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1242 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1009 | 3.5 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1080 | 2.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1080 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1310 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 871 | 3.5 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 1118 | 2.6 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 1118 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 258 | 4.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 139 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 233 | 3.4 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 439 | 3.5 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.2 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 353. | 1.3 | .0 | .1 | .7 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 82. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 171. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 107. | 1.0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | .8 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 97. | .9 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .2 | .0 | .0 | .0 | .1 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .1 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .1 |
| 7. SW7 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND TEMPLE STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 287 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 259 | 4.6 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 562 | 3.3 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 562 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 638 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 396 | 4.6 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1063 | 4.6 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1063 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1213 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 829 | 3.3 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 720 | 2.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 720 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1423 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 1198 | 3.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 1216 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 1216 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 28 | 4.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 242 | 4.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 384 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 225 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | .9 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 275. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 82. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 174. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .7 | .0 |
| 5. NE7 | 191. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 6. SE7 | 276. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 82. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | 172. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .1 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .1 | .0 | .0 | .0 | .2 | .4 | .0 | .0 | .0 | .1 | .0 |
| 4. NW3 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND TEMPLE STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 228 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 203 | 4.8 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 503 | 3.5 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 503 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 606 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 364 | 4.8 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1031 | 5.0 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1031 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1205 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 821 | 3.3 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 712 | 2.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 712 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1423 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 1198 | 3.3 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 1216 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 1216 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 25 | 4.8 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 242 | 4.8 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 384 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 225 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | .9 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 275. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 82. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 174. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .7 | .0 |
| 5. NE7 | 191. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 6. SE7 | 276. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 82. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 8. NW7 | 172. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .1 | .0 | .0 | .0 | .2 | .4 | .0 | .0 | .0 | .1 | .0 |
| 4. NW3 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .1 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINK SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND GTK WAY / 2ND PLACE PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S  Z0= 100. CM  ALT= 0. (FT)
BRG= WORST CASE  VD= .0 CM/S
CLAS= 7 (G)  VS= .0 CM/S
MIXH= 1000. M  AMB= .0 PPM
SIGTH= 5. DEGREES  TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 15 | -1500 | 15 | -500 | AG | 935 | 2.3 | .0 | 35.0 |
| B. NA | 15 | -500 | 15 | 0 | AG | 790 | 4.3 | .0 | 33.0 |
| C. ND | 15 | 0 | 15 | 500 | AG | 1249 | 5.0 | .0 | 33.0 |
| D. NE | 15 | 500 | 15 | 1500 | AG | 1249 | 2.3 | .0 | 35.0 |
| E. SF | -15 | 1500 | -15 | 500 | AG | 113 | 2.3 | .0 | 35.0 |
| F. SA | -15 | 500 | -15 | 0 | AG | 100 | 4.0 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 250 | 2.7 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 250 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1085 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 925 | 3.8 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 639 | 2.6 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 639 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 194 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 98 | 3.8 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 189 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 189 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 145 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 13 | 4.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 160 | 3.8 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 96 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 48 | 6.0 |
| 2. SE3 | 33 | -48 | 6.0 |
| 3. SW3 | -33 | -48 | 6.0 |
| 4. NW3 | -33 | 48 | 6.0 |
| 5. NE7 | 46 | 61 | 6.0 |
| 6. SE7 | 46 | -61 | 6.0 |
| 7. SW7 | -46 | -61 | 6.0 |
| 8. NW7 | -46 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | 1.4 | .0 | .6 | .4 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 356. | 1.5 | .0 | .2 | 1.0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 7. | .7 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 95. | 1.0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | 186. | .8 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 354. | 1.0 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 10. | .6 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 97. | .8 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND GTK WAY / 2ND PLACE PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 15 | -1500 | 15 | -500 | AG | 870 | 2.3 | .0 | 35.0 |
| B. NA | 15 | -500 | 15 | 0 | AG | 725 | 4.1 | .0 | 33.0 |
| C. ND | 15 | 0 | 15 | 500 | AG | 1154 | 5.0 | .0 | 33.0 |
| D. NE | 15 | 500 | 15 | 1500 | AG | 1154 | 2.3 | .0 | 35.0 |
| E. SF | -15 | 1500 | -15 | 500 | AG | 78 | 2.3 | .0 | 35.0 |
| F. SA | -15 | 500 | -15 | 0 | AG | 69 | 4.0 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 250 | 2.6 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 250 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 930 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 770 | 3.9 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 505 | 2.6 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 505 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 157 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 67 | 3.8 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 126 | 2.6 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 126 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 145 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 9 | 4.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 160 | 3.8 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 90 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 48 | 6.0 |
| 2. SE3 | 33 | -48 | 6.0 |
| 3. SW3 | -33 | -48 | 6.0 |
| 4. NW3 | -33 | 48 | 6.0 |
| 5. NE7 | 46 | 61 | 6.0 |
| 6. SE7 | 46 | -61 | 6.0 |
| 7. SW7 | -46 | -61 | 6.0 |
| 8. NW7 | -46 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | 1.3 | .0 | .5 | .3 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 356. | 1.4 | .0 | .2 | 1.0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 8. | .7 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 95. | .9 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | 186. | .7 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 354. | .9 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 10. | .5 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | 97. | .7 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND GTK WAY / 2ND PLACE AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

1. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 15 | -1500 | 15 | -500 | AG | 404 | 2.3 | .0 | 35.0 |
| B. NA | 15 | -500 | 15 | 0 | AG | 271 | 4.3 | .0 | 33.0 |
| C. ND | 15 | 0 | 15 | 500 | AG | 605 | 3.5 | .0 | 33.0 |
| D. NE | 15 | 500 | 15 | 1500 | AG | 605 | 2.3 | .0 | 35.0 |
| E. SF | -15 | 1500 | -15 | 500 | AG | 200 | 2.3 | .0 | 35.0 |
| F. SA | -15 | 500 | -15 | 0 | AG | 190 | 4.3 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 293 | 2.8 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 293 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 375 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 274 | 3.5 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 331 | 2.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 331 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 550 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 252 | 3.5 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 308 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 308 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 133 | 4.3 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 10 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 101 | 3.5 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 306 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 48 | 6.0 |
| 2. SE3 | 33 | -48 | 6.0 |
| 3. SW3 | -33 | -48 | 6.0 |
| 4. NW3 | -33 | 48 | 6.0 |
| 5. NE7 | 46 | 61 | 6.0 |
| 6. SE7 | 46 | -61 | 6.0 |
| 7. SW7 | -46 | -61 | 6.0 |
| 8. NW7 | -46 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | .7 | .0 | .2 | .1 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 356. | .7 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 5. | .6 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 4. NW3 | 174. | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 260. | .4 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 354. | .5 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | .4 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 |
| 8. NW7 | 172. | .4 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND GTK WAY / 2ND PLACE AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 15 | -1500 | 15 | -500 | AG | 301 | 2.3 | .0 | 35.0 |
| B. NA | 15 | -500 | 15 | 0 | AG | 248 | 4.1 | .0 | 33.0 |
| C. ND | 15 | 0 | 15 | 500 | AG | 558 | 3.3 | .0 | 33.0 |
| D. NE | 15 | 500 | 15 | 1500 | AG | 558 | 2.3 | .0 | 35.0 |
| E. SF | -15 | 1500 | -15 | 500 | AG | 187 | 2.3 | .0 | 35.0 |
| F. SA | -15 | 500 | -15 | 0 | AG | 178 | 4.1 | .0 | 33.0 |
| G. SD | -15 | 0 | -15 | -500 | AG | 293 | 2.8 | .0 | 33.0 |
| H. SE | -15 | -500 | -15 | -1500 | AG | 293 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 273 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 172 | 3.6 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 247 | 2.5 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 247 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 547 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 243 | 3.6 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 290 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 290 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 133 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 9 | 4.1 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 101 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 304 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 33 | 48 | 6.0 |
| 2. SE3 | 33 | -48 | 6.0 |
| 3. SW3 | -33 | -48 | 6.0 |
| 4. NW3 | -33 | 48 | 6.0 |
| 5. NE7 | 46 | 61 | 6.0 |
| 6. SE7 | 46 | -61 | 6.0 |
| 7. SW7 | -46 | -61 | 6.0 |
| 8. NW7 | -46 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 185. | .6 | .0 | .2 | .1 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 356. | .6 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 5. | .5 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 4. NW3 | 175. | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 5. NE7 | 260. | .4 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 354. | .4 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 7. | .4 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 |
| 8. NW7 | 173. | .4 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND 1ST STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1159 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 977 | 4.6 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1223 | 4.4 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1223 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 572 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 463 | 4.4 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 890 | 3.1 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 890 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1819 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1628 | 3.4 | .0 | 60.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1653 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1653 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1607 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1448 | 3.5 | .0 | 45.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1471 | 2.6 | .0 | 33.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1471 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 182 | 4.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 109 | 4.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 0 | AG | 191 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 239 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 55 | 6.0 |
| 2. SE3 | 48 | -55 | 6.0 |
| 3. SW3 | -48 | -55 | 6.0 |
| 4. NW3 | -48 | 55 | 6.0 |
| 5. NE7 | 61 | 68 | 6.0 |
| 6. SE7 | 61 | -68 | 6.0 |
| 7. SW7 | -61 | -68 | 6.0 |
| 8. NW7 | -61 | 68 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.4 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 353. | 1.4 | .0 | .2 | .7 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 82. | 1.4 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 172. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .4 | .0 |
| 5. NE7 | 188. | 1.1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | 1.2 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | 1.0 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 |
| 8. NW7 | 97. | 1.1 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .5 | .0 | .1 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .2 | .0 | .0 | .0 | .2 | .5 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .1 | .2 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND 1ST STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S  Z0= 100. CM  ALT= 0. (FT)
BRG= WORST CASE  VD= .0 CM/S
CLAS= 7 (G)  VS= .0 CM/S
MIXH= 1000. M  AMB= .0 PPM
SIGTH= 5. DEGREES  TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1075 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 910 | 4.6 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1106 | 4.6 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1106 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 502 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 449 | 4.4 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 864 | 3.2 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 864 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1708 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1525 | 3.4 | .0 | 60.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1586 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1586 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1580 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1341 | 3.4 | .0 | 45.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1309 | 2.6 | .0 | 33.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1309 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 165 | 4.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 53 | 4.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 0 | AG | 183 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 239 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 55 | 6.0 |
| 2. SE3 | 48 | -55 | 6.0 |
| 3. SW3 | -48 | -55 | 6.0 |
| 4. NW3 | -48 | 55 | 6.0 |
| 5. NE7 | 61 | 68 | 6.0 |
| 6. SE7 | 61 | -68 | 6.0 |
| 7. SW7 | -61 | -68 | 6.0 |
| 8. NW7 | -61 | 68 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.3 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 353. | 1.5 | .0 | .2 | .7 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 82. | 1.4 | .0 | .2 | .6 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 172. | 1.2 | .0 | .2 | .4 | .0 | .0 | .0 | .4 | .0 |
| 5. NE7 | 188. | 1.1 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 277. | 1.1 | .0 | .2 | .6 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 81. | 1.0 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 |
| 8. NW7 | 97. | 1.0 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .5 | .0 | .1 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .2 | .0 | .0 | .0 | .2 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .2 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .1 | .2 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND 1ST STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 268 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 200 | 4.6 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 328 | 2.9 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 328 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 942 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 845 | 5.0 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1632 | 5.3 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1632 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1277 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 987 | 3.3 | .0 | 60.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1129 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1129 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1984 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1881 | 3.5 | .0 | 45.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1382 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1382 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 68 | 4.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 97 | 4.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 290 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 103 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 55 | 6.0 |
| 2. SE3 | 48 | -55 | 6.0 |
| 3. SW3 | -48 | -55 | 6.0 |
| 4. NW3 | -48 | 55 | 6.0 |
| 5. NE7 | 61 | 68 | 6.0 |
| 6. SE7 | 61 | -68 | 6.0 |
| 7. SW7 | -61 | -68 | 6.0 |
| 8. NW7 | -61 | 68 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 260. | 1.0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.6 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 3. SW3 | 82. | 1.6 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 4. NW3 | 174. | 1.8 | .0 | .0 | .0 | .0 | .0 | .2 | 1.1 | .0 |
| 5. NE7 | 192. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .4 | .0 |
| 6. SE7 | 277. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 7. SW7 | 41. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 8. NW7 | 171. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .8 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .1 | .1 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .1 | .1 | .0 | .0 | .0 | .2 | .5 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .1 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: HOPE STREET AND 1ST STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 205 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 144 | 4.6 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 269 | 2.9 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 269 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 909 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 840 | 5.0 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1621 | 5.3 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1621 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1239 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 954 | 3.3 | .0 | 60.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1097 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1097 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -30 | -500 | -30 | AG | 1916 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -30 | 0 | -30 | AG | 1813 | 3.5 | .0 | 45.0 |
| O. ED | 0 | -30 | 500 | -30 | AG | 1282 | 2.5 | .0 | 33.0 |
| P. EE | 500 | -30 | 1500 | -30 | AG | 1282 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 61 | 4.6 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 69 | 4.6 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 8 | AG | 285 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 103 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 55 | 6.0 |
| 2. SE3 | 48 | -55 | 6.0 |
| 3. SW3 | -48 | -55 | 6.0 |
| 4. NW3 | -48 | 55 | 6.0 |
| 5. NE7 | 61 | 68 | 6.0 |
| 6. SE7 | 61 | -68 | 6.0 |
| 7. SW7 | -61 | -68 | 6.0 |
| 8. NW7 | -61 | 68 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 260. | 1.0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.5 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 3. SW3 | 81. | 1.5 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 4. NW3 | 174. | 1.7 | .0 | .0 | .0 | .0 | .0 | .2 | 1.1 | .0 |
| 5. NE7 | 192. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .4 | .0 |
| 6. SE7 | 277. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 7. SW7 | 41. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 8. NW7 | 171. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .8 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .1 | .1 | .9 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .1 | .0 | .0 | .0 | .3 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .1 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND TEMPLE STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1674 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1528 | 4.1 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1833 | 4.0 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1833 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 999 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 964 | 3.9 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1098 | 2.7 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1098 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1332 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1152 | 4.1 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1272 | 2.9 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1272 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1130 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 900 | 4.0 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 932 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 932 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 146 | 3.9 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 35 | 3.9 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 180 | 4.0 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 230 | 4.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.6 | .0 | .0 | .4 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 352. | 1.8 | .0 | .2 | .9 | .0 | .0 | .2 | .0 | .0 |
| 3. SW3 | 81. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 171. | 1.4 | .0 | .3 | .0 | .0 | .0 | .2 | .4 | .0 |
| 5. NE7 | 187. | 1.3 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 351. | 1.2 | .0 | .0 | .6 | .0 | .0 | .1 | .0 | .0 |
| 7. SW7 | 9. | 1.1 | .0 | .0 | .2 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 97. | 1.2 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .2 | .0 | .0 | .0 | .1 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND TEMPLE STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | ZO= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1500 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 1371 | 4.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1676 | 3.6 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1676 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 908 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 874 | 4.0 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1012 | 2.8 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1012 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1332 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 1152 | 4.0 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1255 | 2.8 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1255 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1131 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 901 | 4.0 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 928 | 2.7 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 928 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 129 | 3.9 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 34 | 3.9 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 180 | 3.9 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 230 | 3.9 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.5 | .0 | .0 | .4 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 352. | 1.6 | .0 | .2 | .7 | .0 | .0 | .2 | .0 | .0 |
| 3. SW3 | 81. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 |
| 4. NW3 | 171. | 1.3 | .0 | .3 | .0 | .0 | .0 | .1 | .4 | .0 |
| 5. NE7 | 187. | 1.2 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 351. | 1.1 | .0 | .0 | .5 | .0 | .0 | .1 | .0 | .0 |
| 7. SW7 | 8. | 1.0 | .0 | .0 | .1 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 97. | 1.1 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .2 | .0 | .0 | .0 | .1 | .3 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND TEMPLE STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 507 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 444 | 4.0 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 532 | 2.6 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 532 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1556 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1477 | 4.3 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1638 | 3.8 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1638 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1042 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 759 | 3.9 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1201 | 2.8 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1201 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1218 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 1108 | 4.0 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 952 | 2.7 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 952 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 63 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 79 | 4.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 283 | 3.9 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 110 | 3.9 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.3 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 3. SW3 | 5. | 1.5 | .0 | .0 | .0 | .0 | .0 | .9 | .0 | .0 |
| 4. NW3 | 172. | 1.6 | .0 | .0 | .0 | .0 | .0 | .2 | .8 | .0 |
| 5. NE7 | 260. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 277. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 7. | 1.2 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 172. | 1.0 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .2 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND TEMPLE STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 429 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 374 | 4.0 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 462 | 2.6 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 462 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1570 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1496 | 4.4 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1707 | 4.4 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1707 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 23 | 500 | 23 | AG | 1042 | 2.3 | .0 | 50.0 |
| J. WA | 500 | 23 | 0 | 23 | AG | 759 | 3.9 | .0 | 45.0 |
| K. WD | 0 | 23 | -500 | 23 | AG | 1193 | 2.8 | .0 | 33.0 |
| L. WE | -500 | 23 | -1500 | 23 | AG | 1193 | 2.3 | .0 | 50.0 |
| M. EF | -1500 | -23 | -500 | -23 | AG | 1218 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -23 | 0 | -23 | AG | 1108 | 4.0 | .0 | 45.0 |
| O. ED | 0 | -23 | 500 | -23 | AG | 897 | 2.6 | .0 | 33.0 |
| P. EE | 500 | -23 | 1500 | -23 | AG | 897 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 55 | 4.0 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 74 | 4.0 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 15 | AG | 283 | 3.9 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -15 | AG | 110 | 3.8 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 48 | 6.0 |
| 2. SE3 | 48 | -48 | 6.0 |
| 3. SW3 | -48 | -48 | 6.0 |
| 4. NW3 | -48 | 48 | 6.0 |
| 5. NE7 | 61 | 61 | 6.0 |
| 6. SE7 | 61 | -61 | 6.0 |
| 7. SW7 | -61 | -61 | 6.0 |
| 8. NW7 | -61 | 61 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 275. | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 |
| 3. SW3 | 81. | 1.3 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 4. NW3 | 173. | 1.7 | .0 | .0 | .0 | .0 | .0 | .2 | .9 | .0 |
| 5. NE7 | 260. | .9 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 277. | 1.6 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 |
| 7. SW7 | 7. | 1.2 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 172. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .6 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .1 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .2 | .0 | .0 | .0 | .2 | .3 | .0 | .0 | .0 | .1 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 110/101 RAMPS PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1037 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 845 | 3.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 984 | 2.5 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 984 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 999 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 999 | 3.4 | .0 | 33.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1021 | 2.5 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1021 | 2.3 | .0 | 50.0 |
| I. WF | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | 0 | 1800 | 0 | 1900 | AG | 0 | 5.3 | .0 | 33.0 |
| K. WD | 0 | 1800 | 0 | 1900 | AG | 1381 | 5.3 | .0 | 33.0 |
| L. WE | 0 | 1800 | 0 | 1900 | AG | 1381 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 550 | 2.3 | .0 | 35.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 411 | 5.3 | .0 | 33.0 |
| O. ED | 0 | 1800 | 0 | 1900 | AG | 0 | 3.8 | .0 | 33.0 |
| P. EE | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 992 | 4.6 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.3 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 5.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | 0 | AG | 139 | 5.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 18 | 6.0 |
| 2. SE3 | 48 | -18 | 6.0 |
| 3. SW3 | -48 | -18 | 6.0 |
| 4. NW3 | -48 | 18 | 6.0 |
| 5. NE7 | 61 | 31 | 6.0 |
| 6. SE7 | 61 | -31 | 6.0 |
| 7. SW7 | -61 | -31 | 6.0 |
| 8. NW7 | -61 | 31 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | 1.1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | 186. | 1.1 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 3. SW3 | 170. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 171. | 1.1 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 |
| 5. NE7 | 188. | .8 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .1 |
| 6. SE7 | 276. | .8 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 168. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |
| 8. NW7 | 169. | .9 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 | .1 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 110/101 RAMPS PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1680 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 812 | 3.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 951 | 2.5 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 951 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 976 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 976 | 3.4 | .0 | 33.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 930 | 2.5 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 930 | 2.3 | .0 | 50.0 |
| I. WF | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | 0 | 1800 | 0 | 1900 | AG | 0 | 5.3 | .0 | 33.0 |
| K. WD | 0 | 1800 | 0 | 1900 | AG | 1257 | 5.3 | .0 | 33.0 |
| L. WE | 0 | 1800 | 0 | 1900 | AG | 1257 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 482 | 2.3 | .0 | 35.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 343 | 5.3 | .0 | 33.0 |
| O. ED | 0 | 1800 | 0 | 1900 | AG | 0 | 4.0 | .0 | 33.0 |
| P. EE | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 868 | 4.3 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.3 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 5.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | 0 | AG | 139 | 5.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 18 | 6.0 |
| 2. SE3 | 48 | -18 | 6.0 |
| 3. SW3 | -48 | -18 | 6.0 |
| 4. NW3 | -48 | 18 | 6.0 |
| 5. NE7 | 61 | 31 | 6.0 |
| 6. SE7 | 61 | -31 | 6.0 |
| 7. SW7 | -61 | -31 | 6.0 |
| 8. NW7 | -61 | 31 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 186. | 1.0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 2. SE3 | 186. | 1.0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .1 |
| 3. SW3 | 171. | .8 | .1 | .1 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 171. | 1.0 | .0 | .1 | .0 | .0 | .0 | .0 | .3 | .0 |
| 5. NE7 | 188. | .7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 276. | .7 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 6. | .7 | .0 | .0 | .0 | .1 | .0 | .3 | .0 | .0 |
| 8. NW7 | 169. | .8 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .1 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 110/101 RAMPS AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 433 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 180 | 3.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 240 | 2.5 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 240 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1682 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1682 | 4.0 | .0 | 33.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1594 | 2.6 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1594 | 2.3 | .0 | 50.0 |
| I. WF | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | 0 | 1800 | 0 | 1900 | AG | 0 | 5.0 | .0 | 33.0 |
| K. WD | 0 | 1800 | 0 | 1900 | AG | 812 | 5.3 | .0 | 33.0 |
| L. WE | 0 | 1800 | 0 | 1900 | AG | 812 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 531 | 2.3 | .0 | 35.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 471 | 5.3 | .0 | 33.0 |
| O. ED | 0 | 1800 | 0 | 1900 | AG | 0 | 3.1 | .0 | 33.0 |
| P. EE | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 253 | 3.3 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.3 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 5.0 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | 0 | AG | 60 | 5.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 18 | 6.0 |
| 2. SE3 | 48 | -18 | 6.0 |
| 3. SW3 | -48 | -18 | 6.0 |
| 4. NW3 | -48 | 18 | 6.0 |
| 5. NE7 | 61 | 31 | 6.0 |
| 6. SE7 | 61 | -31 | 6.0 |
| 7. SW7 | -61 | -31 | 6.0 |
| 8. NW7 | -61 | 31 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 267. | .8 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 274. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 6. | 1.2 | .0 | .0 | .0 | .0 | .0 | .8 | .0 | .0 |
| 4. NW3 | 174. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 5. NE7 | 264. | .6 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 276. | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | .8 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 174. | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .1 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 110/101 RAMPS AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 363 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 164 | 3.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 224 | 2.5 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 224 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1696 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1696 | 4.0 | .0 | 33.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1607 | 2.6 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1607 | 2.3 | .0 | 50.0 |
| I. WF | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| J. WA | 0 | 1800 | 0 | 1900 | AG | 0 | 5.0 | .0 | 33.0 |
| K. WD | 0 | 1800 | 0 | 1900 | AG | 758 | 5.3 | .0 | 33.0 |
| L. WE | 0 | 1800 | 0 | 1900 | AG | 758 | 2.3 | .0 | 35.0 |
| M. EF | -1500 | 0 | -500 | 0 | AG | 530 | 2.3 | .0 | 35.0 |
| N. EA | -500 | 0 | 0 | 0 | AG | 470 | 5.3 | .0 | 33.0 |
| O. ED | 0 | 1800 | 0 | 1900 | AG | 0 | 3.1 | .0 | 33.0 |
| P. EE | 0 | 1800 | 0 | 1900 | AG | 0 | 2.3 | .0 | 35.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 199 | 3.3 | .0 | 33.0 |
| R. SL | 0 | -1900 | 0 | -1800 | AG | 0 | 3.3 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 5.0 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | 0 | AG | 60 | 5.0 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 18 | 6.0 |
| 2. SE3 | 48 | -18 | 6.0 |
| 3. SW3 | -48 | -18 | 6.0 |
| 4. NW3 | -48 | 18 | 6.0 |
| 5. NE7 | 61 | 31 | 6.0 |
| 6. SE7 | 61 | -31 | 6.0 |
| 7. SW7 | -61 | -31 | 6.0 |
| 8. NW7 | -61 | 31 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 267. | .8 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 274. | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 3. SW3 | 6. | 1.2 | .0 | .0 | .0 | .0 | .0 | .8 | .0 | .0 |
| 4. NW3 | 6. | 1.0 | .0 | .0 | .0 | .0 | .0 | .8 | .0 | .0 |
| 5. NE7 | 264. | .6 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 276. | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .1 | .0 |
| 7. SW7 | 7. | .8 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |
| 8. NW7 | 174. | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .1 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

## Grand Avenue (4 of 4)

CALINE4 Modeling Results and Estimated Local 8-Hour Carbon Monoxide Concentrations (ppm)

| Projected Background 8-Hour CO Concentrations (ppm) [a] | |
|---|---|
| Monitoring Station: Central LA<br>Year 2015 — 8-Hr Concentration 4.6 | Average Persistence Factor = 0.70 |

| Intersection and Receptor Locations | Future Without Project: Traffic CO Contribution [b] | Future Without Project: Estimated Local CO Concentration [c] | Future With Project: Traffic CO Contribution [b] | Future With Project: Estimated Local CO Concentration [c] | Future With Project: Exceedance of Significance Threshold [d] |
|---|---|---|---|---|---|
| BROADWAY AND 1ST STREET AM | | | | | |
| NE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SE | 0.6 | 5.2 | 0.7 | 5.3 | NO |
| SW | 0.7 | 5.3 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| BROADWAY AND 1ST STREET PM | | | | | |
| NE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SE | 0.8 | 5.4 | 0.9 | 5.5 | NO |
| SW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| NW | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| BROADWAY AND 2ND STREET AM | | | | | |
| NE | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| SE | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| BROADWAY AND 2ND STREET PM | | | | | |
| NE | 0.7 | 5.3 | 0.7 | 5.3 | NO |
| SE | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| SW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| NW | 0.6 | 5.2 | 0.6 | 5.2 | NO |
| FIGUREROA STREET AND 3RD STREET AM | | | | | |
| NE | 1.0 | 5.6 | 1.0 | 5.6 | NO |
| SE | 0.8 | 5.4 | 0.8 | 5.4 | NO |
| SW | 1.1 | 5.7 | 1.1 | 5.7 | NO |
| NW | 0.9 | 5.5 | 0.9 | 5.5 | NO |
| FIGUREROA STREET AND 3RD STREET PM | | | | | |
| NE | 1.4 | 6.0 | 1.5 | 6.1 | NO |
| SE | 1.3 | 5.9 | 1.3 | 5.9 | NO |
| SW | 1.0 | 5.6 | 1.0 | 5.6 | NO |
| NW | 1.3 | 5.9 | 1.3 | 5.9 | NO |
| GRAND AVENUE AND UPPER 2ND STREET AM | | | | | |
| NE | 0.2 | 4.8 | 0.3 | 4.9 | NO |
| SE | 0.3 | 4.9 | 0.3 | 4.9 | NO |
| SW | 0.5 | 5.1 | 0.5 | 5.1 | NO |
| NW | 0.4 | 5.0 | 0.5 | 5.1 | NO |
| GRAND AVENUE AND UPPER 2ND STREET PM | | | | | |
| NE | 0.2 | 4.8 | 0.3 | 4.9 | NO |
| SE | 0.3 | 4.9 | 0.4 | 5.0 | NO |
| SW | 0.4 | 5.0 | 0.5 | 5.1 | NO |
| NW | 0.4 | 5.0 | 0.4 | 5.0 | NO |

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook.

b The persistence factor is calculated as recommended in Table B.15 in the Transportation Project-Level Carbon Monoxide Protocol (Institute of Transportation Studies, UC Davis, Revised 1997). This is a generalized persistence factor likely to provide a conservative estimate in most situations.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 8-hour CO concentrations is 9 ppm.

Title : Los Angeles County Avg 2015 Winter Default Title
Version : Emfac2002 V2.2 Apr 23 2003
Run Date : 01/27/05 16:01:47
Scen Year: 2015 -- Model Years: 1970 to 2015
Season : Winter
Area : Los Angeles County

**********

Year:2015 -- Model Years 1970 to 2015 Inclusive -- Winter
Emfac2002 Emission Factors: V2.2 Apr 23 2003

County Average

Table 1: Running Exhaust Emissions (grams/mile)

Pollutant Name: Carbon Monoxide Temperature: 60F Relative Humidity: 50%

| Speed MPH | LDA | LDT | MDT | HDT | UBUS | MCY | ALL |
|---|---|---|---|---|---|---|---|
| 3 | 3.563 | 6.794 | 7.410 | 9.924 | 37.917 | 27.766 | 5.314 |
| 4 | 3.454 | 6.534 | 7.132 | 9.924 | 37.917 | 27.766 | 5.157 |
| 5 | 3.351 | 6.292 | 6.875 | 9.924 | 37.917 | 27.766 | 5.010 |
| 6 | 3.254 | 6.066 | 6.588 | 9.141 | 34.711 | 26.724 | 4.809 |
| 7 | 3.162 | 5.855 | 6.322 | 8.437 | 31.848 | 25.768 | 4.623 |
| 8 | 3.075 | 5.657 | 6.076 | 7.803 | 29.287 | 24.888 | 4.451 |
| 9 | 2.992 | 5.472 | 5.848 | 7.231 | 26.993 | 24.080 | 4.291 |
| 10 | 2.914 | 5.299 | 5.636 | 6.715 | 24.935 | 23.338 | 4.141 |
| 11 | 2.840 | 5.136 | 5.439 | 6.248 | 23.087 | 22.657 | 4.002 |
| 12 | 2.769 | 4.983 | 5.255 | 5.826 | 21.423 | 22.032 | 3.873 |
| 13 | 2.702 | 4.839 | 5.083 | 5.443 | 19.924 | 21.459 | 3.751 |
| 14 | 2.637 | 4.703 | 4.923 | 5.096 | 18.572 | 20.935 | 3.638 |
| 15 | 2.576 | 4.575 | 4.773 | 4.780 | 17.351 | 20.458 | 3.531 |
| 16 | 2.518 | 4.453 | 4.632 | 4.493 | 16.247 | 20.023 | 3.431 |
| 17 | 2.462 | 4.339 | 4.500 | 4.232 | 15.247 | 19.629 | 3.337 |
| 18 | 2.408 | 4.231 | 4.376 | 3.994 | 14.341 | 19.274 | 3.248 |
| 19 | 2.357 | 4.128 | 4.260 | 3.777 | 13.520 | 18.955 | 3.164 |
| 20 | 2.308 | 4.031 | 4.151 | 3.579 | 12.774 | 18.671 | 3.086 |
| 21 | 2.261 | 3.939 | 4.047 | 3.398 | 12.096 | 18.421 | 3.011 |
| 22 | 2.216 | 3.851 | 3.950 | 3.233 | 11.480 | 18.204 | 2.941 |
| 23 | 2.173 | 3.768 | 3.859 | 3.082 | 10.920 | 18.017 | 2.875 |
| 24 | 2.131 | 3.690 | 3.772 | 2.944 | 10.411 | 17.862 | 2.812 |
| 25 | 2.091 | 3.615 | 3.691 | 2.818 | 9.948 | 17.736 | 2.752 |
| 26 | 2.053 | 3.544 | 3.614 | 2.703 | 9.526 | 17.641 | 2.696 |
| 27 | 2.016 | 3.476 | 3.542 | 2.598 | 9.143 | 17.574 | 2.643 |
| 28 | 1.981 | 3.412 | 3.474 | 2.502 | 8.796 | 17.537 | 2.592 |
| 29 | 1.947 | 3.351 | 3.409 | 2.414 | 8.480 | 17.529 | 2.545 |
| 30 | 1.914 | 3.294 | 3.349 | 2.334 | 8.194 | 17.552 | 2.499 |
| 31 | 1.883 | 3.239 | 3.291 | 2.261 | 7.936 | 17.604 | 2.457 |
| 32 | 1.853 | 3.187 | 3.238 | 2.195 | 7.703 | 17.687 | 2.416 |
| 33 | 1.824 | 3.138 | 3.187 | 2.135 | 7.493 | 17.802 | 2.378 |
| 34 | 1.796 | 3.092 | 3.140 | 2.081 | 7.306 | 17.950 | 2.342 |
| 35 | 1.769 | 3.048 | 3.096 | 2.033 | 7.139 | 18.132 | 2.308 |
| 36 | 1.744 | 3.006 | 3.054 | 1.989 | 6.992 | 18.349 | 2.276 |
| 37 | 1.719 | 2.968 | 3.016 | 1.951 | 6.863 | 18.604 | 2.246 |
| 38 | 1.696 | 2.931 | 2.980 | 1.917 | 6.751 | 18.898 | 2.218 |
| 39 | 1.674 | 2.897 | 2.947 | 1.887 | 6.656 | 19.233 | 2.192 |
| 40 | 1.652 | 2.865 | 2.917 | 1.862 | 6.578 | 19.613 | 2.168 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND UPPER 2ND STREET PM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (M) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (M) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (M) | W (M) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 7 | -450 | 7 | -150 | AG | 255 | 2.3 | .0 | 15.0 |
| B. NA | 7 | -150 | 7 | 0 | AG | 236 | 3.5 | .0 | 13.5 |
| C. ND | 7 | 0 | 7 | 150 | AG | 805 | 2.6 | .0 | 9.9 |
| D. NE | 7 | 150 | 7 | 450 | AG | 805 | 2.3 | .0 | 15.0 |
| E. SF | -7 | 450 | -7 | 150 | AG | 1228 | 2.3 | .0 | 15.0 |
| F. SA | -7 | 150 | -7 | 0 | AG | 1216 | 3.6 | .0 | 13.5 |
| G. SD | -7 | 0 | -7 | -150 | AG | 1221 | 2.6 | .0 | 9.9 |
| H. SE | -7 | -150 | -7 | -450 | AG | 1221 | 2.3 | .0 | 15.0 |
| I. WF | 0 | 540 | 0 | 570 | AG | 665 | 2.3 | .0 | 10.5 |
| J. WA | 0 | 540 | 0 | 570 | AG | 607 | 5.3 | .0 | 9.9 |
| K. WD | 0 | 540 | 0 | 570 | AG | 319 | 2.8 | .0 | 9.9 |
| L. WE | 0 | 540 | 0 | 570 | AG | 319 | 2.3 | .0 | 10.5 |
| M. EF | -450 | 5 | -150 | 5 | AG | 262 | 2.3 | .0 | 15.0 |
| N. EA | -150 | 5 | 0 | 5 | AG | 129 | 4.3 | .0 | 9.9 |
| O. ED | 0 | 540 | 0 | 570 | AG | 65 | 2.7 | .0 | 9.9 |
| P. EE | 0 | 540 | 0 | 570 | AG | 65 | 2.3 | .0 | 10.5 |
| Q. WL | 0 | 0 | 5 | -150 | AG | 19 | 3.5 | .0 | 9.9 |
| R. SL | 0 | -570 | 0 | -540 | AG | 12 | 3.5 | .0 | 9.9 |
| S. WL | 0 | -570 | 0 | -540 | AG | 58 | 4.3 | .0 | 9.9 |
| T. EL | 0 | 0 | -150 | -5 | AG | 133 | 4.3 | .0 | 9.9 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (M) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 14 | 10 | 1.8 |
| 2. SE3 | 14 | -10 | 1.8 |
| 3. SW3 | -14 | -10 | 1.8 |
| 4. NW3 | -14 | 10 | 1.8 |
| 5. NE7 | 18 | 14 | 1.8 |
| 6. SE7 | 18 | -14 | 1.8 |
| 7. SW7 | -18 | -14 | 1.8 |
| 8. NW7 | -18 | 14 | 1.8 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 354. | .6 | .0 | .0 | .3 | .0 | .2 | .0 | .0 | .0 |
| 2. SE3 | 353. | .6 | .0 | .0 | .3 | .0 | .1 | .1 | .0 | .0 |
| 3. SW3 | 5. | 1.0 | .0 | .0 | .0 | .1 | .0 | .7 | .0 | .0 |
| 4. NW3 | 5. | 1.0 | .0 | .0 | .0 | .1 | .1 | .7 | .0 | .0 |
| 5. NE7 | 353. | .4 | .0 | .0 | .2 | .0 | .2 | .0 | .0 | .0 |
| 6. SE7 | 352. | .5 | .0 | .0 | .2 | .0 | .1 | .1 | .0 | .0 |
| 7. SW7 | 6. | .7 | .0 | .0 | .0 | .1 | .0 | .4 | .0 | .0 |
| 8. NW7 | 7. | .6 | .0 | .0 | .0 | .1 | .0 | .4 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND UPPER 2ND STREET PM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Zo= | 100. CM | ALT= | 0. (M) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (M) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (M) | W (M) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 7 | -450 | 7 | -150 | AG | 254 | 2.3 | .0 | 15.0 |
| B. NA | 7 | -150 | 7 | 0 | AG | 235 | 3.3 | .0 | 13.5 |
| C. ND | 7 | 0 | 7 | 150 | AG | 476 | 2.5 | .0 | 9.9 |
| D. NE | 7 | 150 | 7 | 450 | AG | 476 | 2.3 | .0 | 15.0 |
| E. SF | -7 | 450 | -7 | 150 | AG | 1127 | 2.3 | .0 | 15.0 |
| F. SA | -7 | 150 | -7 | 0 | AG | 1123 | 3.3 | .0 | 13.5 |
| G. SD | -7 | 0 | -7 | -150 | AG | 1137 | 2.5 | .0 | 9.9 |
| H. SE | -7 | -150 | -7 | -450 | AG | 1137 | 2.3 | .0 | 15.0 |
| I. WF | 0 | 540 | 0 | 570 | AG | 254 | 2.3 | .0 | 10.5 |
| J. WA | 0 | 540 | 0 | 570 | AG | 240 | 4.8 | .0 | 9.9 |
| K. WD | 0 | 540 | 0 | 570 | AG | 110 | 3.0 | .0 | 9.9 |
| L. WE | 0 | 540 | 0 | 570 | AG | 110 | 2.3 | .0 | 10.5 |
| M. EF | -450 | 5 | -150 | 5 | AG | 122 | 2.3 | .0 | 15.0 |
| N. EA | -150 | 5 | 0 | 5 | AG | 66 | 4.8 | .0 | 9.9 |
| O. ED | 0 | 540 | 0 | 570 | AG | 34 | 3.0 | .0 | 9.9 |
| P. EE | 0 | 540 | 0 | 570 | AG | 34 | 2.3 | .0 | 10.5 |
| Q. NL | 0 | 0 | 5 | -150 | AG | 19 | 3.3 | .0 | 9.9 |
| R. SL | 0 | -570 | 0 | -540 | AG | 4 | 3.3 | .0 | 9.9 |
| S. WL | 0 | -570 | 0 | -540 | AG | 14 | 4.8 | .0 | 9.9 |
| T. EL | 0 | 0 | -150 | -5 | AG | 56 | 4.8 | .0 | 9.9 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (M) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 14 | 10 | 1.8 |
| 2. SE3 | 14 | -10 | 1.8 |
| 3. SW3 | -14 | -10 | 1.8 |
| 4. NW3 | -14 | 10 | 1.8 |
| 5. NE7 | 18 | 14 | 1.8 |
| 6. SE7 | 18 | -14 | 1.8 |
| 7. SW7 | -18 | -14 | 1.8 |
| 8. NW7 | -18 | 14 | 1.8 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 354. | .4 | .0 | .0 | .2 | .0 | .2 | .0 | .0 | .0 |
| 2. SE3 | 353. | .5 | .0 | .0 | .2 | .0 | .1 | .1 | .0 | .0 |
| 3. SW3 | 5. | .8 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 4. NW3 | 5. | .8 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 5. NE7 | 353. | .3 | .0 | .0 | .1 | .0 | .1 | .0 | .0 | .0 |
| 6. SE7 | 352. | .4 | .0 | .0 | .1 | .0 | .1 | .1 | .0 | .0 |
| 7. SW7 | 6. | .5 | .0 | .0 | .0 | .0 | .0 | .4 | .0 | .0 |
| 8. NW7 | 6. | .5 | .0 | .0 | .0 | .0 | .1 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND UPPER 2ND STREET AM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S — Z0= 100. CM — ALT= 0. (M)
BRG= WORST CASE — VD= .0 CM/S
CLAS= 7 (G) — VS= .0 CM/S
MIXH= 1000. M — AMB= .0 PPM
SIGTH= 5. DEGREES — TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (M) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (M) | W (M) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 7 | -450 | 7 | -150 | AG | 136 | 2.3 | .0 | 15.0 |
| B. NA | 7 | -150 | 7 | 0 | AG | 113 | 3.3 | .0 | 13.5 |
| C. ND | 7 | 0 | 7 | 150 | AG | 411 | 2.5 | .0 | 9.9 |
| D. NE | 7 | 150 | 7 | 450 | AG | 411 | 2.3 | .0 | 15.0 |
| E. SF | -7 | 450 | -7 | 150 | AG | 1675 | 2.3 | .0 | 15.0 |
| F. SA | -7 | 150 | -7 | 0 | AG | 1653 | 3.5 | .0 | 13.5 |
| G. SD | -7 | 0 | -7 | -150 | AG | 1581 | 2.6 | .0 | 9.9 |
| H. SE | -7 | -150 | -7 | -450 | AG | 1581 | 2.3 | .0 | 15.0 |
| I. WF | 0 | 540 | 0 | 570 | AG | 383 | 2.3 | .0 | 10.5 |
| J. WA | 0 | 540 | 0 | 570 | AG | 351 | 5.3 | .0 | 9.9 |
| K. WD | 0 | 540 | 0 | 570 | AG | 317 | 3.6 | .0 | 9.9 |
| L. WE | 0 | 540 | 0 | 570 | AG | 317 | 2.3 | .0 | 10.5 |
| M. EF | -450 | 5 | -150 | 5 | AG | 159 | 2.3 | .0 | 15.0 |
| N. EA | -150 | 5 | 0 | 5 | AG | 74 | 4.8 | .0 | 9.9 |
| O. ED | 0 | 540 | 0 | 570 | AG | 44 | 2.9 | .0 | 9.9 |
| P. EE | 0 | 540 | 0 | 570 | AG | 44 | 2.3 | .0 | 10.5 |
| Q. NL | 0 | 0 | 5 | -150 | AG | 23 | 3.3 | .0 | 9.9 |
| R. SL | 0 | -570 | 0 | -540 | AG | 22 | 3.3 | .0 | 9.9 |
| S. WL | 0 | -570 | 0 | -540 | AG | 32 | 4.8 | .0 | 9.9 |
| T. EL | 0 | 0 | -150 | -5 | AG | 85 | 4.8 | .0 | 9.9 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (M) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 14 | 10 | 1.8 |
| 2. SE3 | 14 | -10 | 1.8 |
| 3. SW3 | -14 | -10 | 1.8 |
| 4. NW3 | -14 | 10 | 1.8 |
| 5. NE7 | 18 | 14 | 1.8 |
| 6. SE7 | 18 | -14 | 1.8 |
| 7. SW7 | -18 | -14 | 1.8 |
| 8. NW7 | -18 | 14 | 1.8 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 352. | .5 | .0 | .0 | .2 | .0 | .2 | .2 | .0 | .0 |
| 2. SE3 | 352. | .5 | .0 | .0 | .2 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 5. | 1.1 | .0 | .0 | .0 | .0 | .1 | .8 | .0 | .0 |
| 4. NW3 | 5. | 1.1 | .0 | .0 | .0 | .0 | .1 | .9 | .0 | .0 |
| 5. NE7 | 347. | .4 | .0 | .0 | .1 | .0 | .0 | .3 | .0 | .0 |
| 6. SE7 | 350. | .4 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 7. SW7 | 6. | .7 | .0 | .0 | .0 | .0 | .1 | .5 | .0 | .0 |
| 8. NW7 | 7. | .7 | .0 | .0 | .0 | .0 | .0 | .5 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND UPPER 2ND STREET AM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (M) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (M) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (M) | W (M) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 7 | -450 | 7 | -150 | AG | 135 | 2.3 | .0 | 15.0 |
| B. NA | 7 | -150 | 7 | 0 | AG | 112 | 3.3 | .0 | 13.5 |
| C. ND | 7 | 0 | 7 | 150 | AG | 193 | 2.5 | .0 | 9.9 |
| D. NE | 7 | 150 | 7 | 450 | AG | 193 | 2.3 | .0 | 15.0 |
| E. SF | -7 | 450 | -7 | 150 | AG | 1646 | 2.3 | .0 | 15.0 |
| F. SA | -7 | 150 | -7 | 0 | AG | 1627 | 3.4 | .0 | 13.5 |
| G. SD | -7 | 0 | -7 | -150 | AG | 1531 | 2.6 | .0 | 9.9 |
| H. SE | -7 | -150 | -7 | -450 | AG | 1531 | 2.3 | .0 | 15.0 |
| I. WF | 0 | 540 | 0 | 570 | AG | 163 | 2.3 | .0 | 10.5 |
| J. WA | 0 | 540 | 0 | 570 | AG | 151 | 5.3 | .0 | 9.9 |
| K. WD | 0 | 540 | 0 | 570 | AG | 241 | 5.2 | .0 | 9.9 |
| L. WE | 0 | 540 | 0 | 570 | AG | 241 | 2.3 | .0 | 10.5 |
| M. EF | -450 | 5 | -150 | 5 | AG | 58 | 2.3 | .0 | 15.0 |
| N. EA | -150 | 5 | 0 | 5 | AG | 40 | 5.3 | .0 | 9.9 |
| O. ED | 0 | 540 | 0 | 570 | AG | 37 | 5.2 | .0 | 9.9 |
| P. EE | 0 | 540 | 0 | 570 | AG | 37 | 2.3 | .0 | 10.5 |
| Q. NL | 0 | 0 | 5 | -150 | AG | 23 | 3.3 | .0 | 9.9 |
| R. SL | 0 | -570 | 0 | -540 | AG | 19 | 3.3 | .0 | 9.9 |
| S. WL | 0 | -570 | 0 | -540 | AG | 12 | 5.3 | .0 | 9.9 |
| T. EL | 0 | 0e | -150 | -5 | AG | 18 | 5.3 | .0 | 9.9 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (M) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 14 | 10 | 1.8 |
| 2. SE3 | 14 | -10 | 1.8 |
| 3. SW3 | -14 | -10 | 1.8 |
| 4. NW3 | -14 | 10 | 1.8 |
| 5. NE7 | 18 | 14 | 1.8 |
| 6. SE7 | 18 | -14 | 1.8 |
| 7. SW7 | -18 | -14 | 1.8 |
| 8. NW7 | -18 | 14 | 1.8 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 349. | .4 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 |
| 2. SE3 | 352. | .4 | .0 | .0 | .0 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 4. | 1.0 | .0 | .0 | .0 | .0 | .1 | .8 | .0 | .0 |
| 4. NW3 | 5. | 1.0 | .0 | .0 | .0 | .0 | .1 | .9 | .0 | .0 |
| 5. NE7 | 347. | .3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 6. SE7 | 350. | .4 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 7. SW7 | 6. | .7 | .0 | .0 | .0 | .0 | .1 | .5 | .0 | .0 |
| 8. NW7 | 6. | .6 | .0 | .0 | .0 | .0 | .1 | .4 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: FIGUREROA STREET AND 3RD STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 38 | -1500 | 38 | -500 | AG | 4655 | 2.3 | .0 | 80.0 |
| B. NA | 38 | -500 | 38 | 0 | AG | 3039 | 3.5 | .0 | 105.0 |
| C. ND | 38 | 0 | 38 | 500 | AG | 3038 | 2.8 | .0 | 60.0 |
| D. NE | 38 | 500 | 38 | 1500 | AG | 3038 | 2.3 | .0 | 80.0 |
| E. SF | -53 | 1500 | -53 | 500 | AG | 656 | 2.3 | .0 | 50.0 |
| F. SA | -53 | 500 | -53 | 0 | AG | 656 | 3.4 | .0 | 33.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 2820 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 2820 | 5.3 | .0 | 75.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 5011 | 5.3 | .0 | 75.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 5011 | 2.3 | .0 | 95.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 36 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 36 | 4.3 | .0 | 33.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 118 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 118 | 2.3 | .0 | 50.0 |
| Q. WL | 0 | 0 | 15 | -500 | AG | 1616 | 3.6 | .0 | 65.0 |
| R. SL | 0 | 0 | -45 | 500 | AG | 0 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -38 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 78 | 63 | 6.0 |
| 2. SE3 | 78 | -63 | 6.0 |
| 3. SW3 | -48 | -63 | 6.0 |
| 4. NW3 | -78 | 63 | 6.0 |
| 5. NE7 | 91 | 76 | 6.0 |
| 6. SE7 | 91 | -76 | 6.0 |
| 7. SW7 | -61 | -76 | 6.0 |
| 8. NW7 | -91 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 2.7 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 283. | 2.0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 77. | 1.5 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 259. | 2.3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | 260. | 2.1 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 284. | 1.8 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 5. | 1.4 | .0 | .0 | .0 | .3 | .0 | .3 | .0 | .0 |
| 8. NW7 | 144. | 1.9 | .0 | .3 | .0 | .0 | .0 | .1 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | 1.9 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | 1.3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 3. SW3 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | 2.2 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | 1.6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | 1.1 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: FIGUEROA STREET AND 3RD STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 38 | -1500 | 38 | -500 | AG | 4633 | 2.3 | .0 | 80.0 |
| B. NA | 38 | -500 | 38 | 0 | AG | 3017 | 3.5 | .0 | 105.0 |
| C. ND | 38 | 0 | 38 | 500 | AG | 3016 | 2.7 | .0 | 60.0 |
| D. NE | 38 | 500 | 38 | 1500 | AG | 3016 | 2.3 | .0 | 80.0 |
| E. SF | -53 | 1500 | -53 | 500 | AG | 656 | 2.3 | .0 | 50.0 |
| F. SA | -53 | 500 | -53 | 0 | AG | 656 | 3.4 | .0 | 33.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 2672 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 2672 | 5.2 | .0 | 75.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 4863 | 5.3 | .0 | 75.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 4863 | 2.3 | .0 | 95.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 36 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 36 | 4.4 | .0 | 33.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 118 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 118 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 1616 | 3.6 | .0 | 45.0 |
| R. SL | 0 | 0 | -45 | 500 | AG | 0 | 3.3 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.4 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -30 | AG | 0 | 4.4 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 78 | 63 | 6.0 |
| 2. SE3 | 78 | -63 | 6.0 |
| 3. SW3 | -48 | -63 | 6.0 |
| 4. NW3 | -78 | 63 | 6.0 |
| 5. NE7 | 91 | 76 | 6.0 |
| 6. SE7 | 91 | -76 | 6.0 |
| 7. SW7 | -61 | -76 | 6.0 |
| 8. NW7 | -91 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 2.6 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | 283. | 2.0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 77. | 1.4 | .0 | .4 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | 259. | 2.2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | 260. | 2.0 | .0 | .0 | .4 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | 284. | 1.8 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 5. | 1.4 | .0 | .0 | .0 | .3 | .0 | .3 | .0 | .0 |
| 8. NW7 | 144. | 1.8 | .0 | .3 | .0 | .0 | .0 | .1 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | 1.9 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | 1.2 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 3. SW3 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .3 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | 2.1 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | 1.5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | 1.1 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | 1.1 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: FIGURERGA STREET AND 3RD STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 38 | -1500 | 38 | -500 | AG | 1944 | 2.3 | .0 | 80.0 |
| B. NA | 38 | -500 | 38 | 0 | AG | 1185 | 3.4 | .0 | 105.0 |
| C. ND | 38 | 0 | 38 | 500 | AG | 1111 | 2.5 | .0 | 60.0 |
| D. NE | 38 | 500 | 38 | 1500 | AG | 1111 | 2.3 | .0 | 80.0 |
| E. SF | -53 | 1500 | -53 | 500 | AG | 1254 | 2.3 | .0 | 50.0 |
| F. SA | -53 | 500 | -53 | 0 | AG | 1254 | 3.8 | .0 | 33.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 1585 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 1585 | 4.4 | .0 | 75.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 3557 | 4.6 | .0 | 75.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 3557 | 2.3 | .0 | 95.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 183 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 183 | 4.3 | .0 | 33.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 298 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 298 | 2.3 | .0 | 50.0 |
| Q. ML | 0 | 0 | 15 | -500 | AG | 759 | 3.5 | .0 | 45.0 |
| R. SL | 0 | 0 | -45 | 500 | AG | 0 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -30 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 78 | 63 | 6.0 |
| 2. SE3 | 78 | -63 | 6.0 |
| 3. SW3 | -48 | -63 | 6.0 |
| 4. NW3 | -78 | 63 | 6.0 |
| 5. NE7 | 91 | 76 | 6.0 |
| 6. SE7 | 91 | -76 | 6.0 |
| 7. SW7 | -61 | -76 | 6.0 |
| 8. NW7 | -91 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.8 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 282. | 1.3 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 360. | 1.6 | .0 | .0 | .0 | .0 | .2 | .8 | .0 | .0 |
| 4. NW3 | 145. | 1.5 | .0 | .1 | .0 | .0 | .0 | .4 | .0 | .0 |
| 5. NE7 | 261. | 1.4 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 |
| 6. SE7 | 283. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 2. | 1.5 | .0 | .0 | .0 | .0 | .1 | .7 | .0 | .0 |
| 8. NW7 | 143. | 1.3 | .0 | .1 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | 1.3 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .9 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | 1.0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: FIGUREROA STKEET AND 3RD STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 38 | -1500 | 38 | -500 | AG | 1938 | 2.3 | .0 | 80.0 |
| B. NA | 38 | -500 | 38 | 0 | AG | 1179 | 3.4 | .0 | 105.0 |
| C. ND | 38 | 0 | 38 | 500 | AG | 1105 | 2.5 | .0 | 60.0 |
| D. NE | 38 | 500 | 38 | 1500 | AG | 1105 | 2.3 | .0 | 80.0 |
| E. SF | -53 | 1500 | -53 | 500 | AG | 1254 | 2.3 | .0 | 50.0 |
| F. SA | -53 | 500 | -53 | 0 | AG | 1254 | 3.8 | .0 | 33.0 |
| G. SD | -38 | 0 | -38 | -500 | AG | 0 | 2.5 | .0 | 33.0 |
| H. SE | -38 | -500 | -38 | -1500 | AG | 0 | 2.3 | .0 | 35.0 |
| I. WF | 1500 | 15 | 500 | 15 | AG | 1505 | 2.3 | .0 | 95.0 |
| J. WA | 500 | 15 | 0 | 15 | AG | 1505 | 4.4 | .0 | 75.0 |
| K. WD | 0 | 15 | -500 | 15 | AG | 3477 | 4.6 | .0 | 75.0 |
| L. WE | -500 | 15 | -1500 | 15 | AG | 3477 | 2.3 | .0 | 95.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 183 | 2.3 | .0 | 50.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 183 | 4.3 | .0 | 33.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 298 | 2.8 | .0 | 33.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 298 | 2.3 | .0 | 50.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 759 | 3.4 | .0 | 45.0 |
| R. SL | 0 | 0 | -45 | 500 | AG | 0 | 3.4 | .0 | 33.0 |
| S. WL | 0 | -1900 | 0 | -1800 | AG | 0 | 4.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -38 | AG | 0 | 4.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 78 | 63 | 6.0 |
| 2. SE3 | 78 | -63 | 6.0 |
| 3. SW3 | -48 | -63 | 6.0 |
| 4. NW3 | -78 | 63 | 6.0 |
| 5. NE7 | 91 | 76 | 6.0 |
| 6. SE7 | 91 | -76 | 6.0 |
| 7. SW7 | -61 | -76 | 6.0 |
| 8. NW7 | -91 | 76 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 262. | 1.7 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 |
| 2. SE3 | 282. | 1.2 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | 360. | 1.6 | .0 | .0 | .0 | .0 | .2 | .8 | .0 | .0 |
| 4. NW3 | 145. | 1.5 | .0 | .1 | .0 | .0 | .0 | .4 | .0 | .0 |
| 5. NE7 | 261. | 1.4 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 |
| 6. SE7 | 283. | 1.1 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | 2. | 1.5 | .0 | .0 | .0 | .0 | .1 | .7 | .0 | .0 |
| 8. NW7 | 143. | 1.3 | .0 | .1 | .0 | .0 | .0 | .3 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .0 | 1.3 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .8 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 |
| 5. NE7 | .0 | .0 | 1.0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .5 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 1ST STREET AM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 189 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 172 | 4.3 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 578 | 2.8 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 578 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1630 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1406 | 4.8 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1645 | 5.0 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1645 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 38 | 500 | 38 | AG | 1574 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 38 | 0 | 38 | AG | 1329 | 3.6 | .0 | 60.0 |
| K. WD | 0 | 38 | -500 | 38 | AG | 1257 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 38 | -1500 | 38 | AG | 1257 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 1295 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 1152 | 3.5 | .0 | 75.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 1208 | 2.5 | .0 | 45.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 1208 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 17 | 4.3 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 224 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 23 | AG | 245 | 3.5 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 143 | 3.5 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 70 | 6.0 |
| 2. SE3 | 48 | -70 | 6.0 |
| 3. SW3 | -48 | -70 | 6.0 |
| 4. NW3 | -48 | 70 | 6.0 |
| 5. NE7 | 61 | 83 | 6.0 |
| 6. SE7 | 61 | -83 | 6.0 |
| 7. SW7 | -61 | -83 | 6.0 |
| 8. NW7 | -61 | 83 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.1 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 351. | 1.1 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 3. SW3 | 5. | 1.5 | .0 | .0 | .0 | .0 | .0 | .9 | .0 | .0 |
| 4. NW3 | 174. | 1.7 | .0 | .0 | .0 | .0 | .0 | .3 | 1.0 | .0 |
| 5. NE7 | 192. | .9 | .0 | .0 | .0 | .0 | .0 | .0 | .4 | .0 |
| 6. SE7 | 348. | .9 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 7. SW7 | 7. | 1.2 | .0 | .0 | .0 | .0 | .0 | .7 | .0 | .0 |
| 8. NW7 | 171. | 1.1 | .0 | .0 | .0 | .0 | .0 | .0 | .7 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .1 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .1 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 1ST STREET AM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

| | | | | | |
|---|---|---|---|---|---|
| U= | .5 M/S | Z0= | 100. CM | ALT= | 0. (FT) |
| BRG= | WORST CASE | VD= | .0 CM/S | | |
| CLAS= | 7 (G) | VS= | .0 CM/S | | |
| MIXH= | 1000. M | AMB= | .0 PPM | | |
| SIGTH= | 5. DEGREES | TEMP= | 15.6 DEGREE (C) | | |

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 408 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 365 | 4.1 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 657 | 2.8 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 657 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1672 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 1419 | 4.6 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1674 | 4.8 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1674 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 38 | 500 | 38 | AG | 1605 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 38 | 0 | 38 | AG | 1355 | 3.6 | .0 | 60.0 |
| K. WD | 0 | 38 | -500 | 38 | AG | 1295 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 38 | -1500 | 38 | AG | 1295 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 1396 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 1253 | 3.6 | .0 | 75.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 1455 | 2.6 | .0 | 45.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 1455 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 43 | 4.1 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 253 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 23 | AG | 250 | 3.6 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 143 | 3.6 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 70 | 6.0 |
| 2. SE3 | 48 | -70 | 6.0 |
| 3. SW3 | -48 | -70 | 6.0 |
| 4. NW3 | -48 | 70 | 6.0 |
| 5. NE7 | 61 | 83 | 6.0 |
| 6. SE7 | 61 | -83 | 6.0 |
| 7. SW7 | -61 | -83 | 6.0 |
| 8. NW7 | -61 | 83 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.2 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 351. | 1.2 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 3. SW3 | 82. | 1.4 | .0 | .0 | .0 | .0 | .0 | .0 | .5 | .0 |
| 4. NW3 | 174. | 1.8 | .0 | .0 | .0 | .0 | .0 | .3 | .9 | .0 |
| 5. NE7 | 191. | .9 | .0 | .2 | .0 | .0 | .0 | .0 | .3 | .0 |
| 6. SE7 | 348. | 1.0 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 7. SW7 | 7. | 1.2 | .0 | .0 | .0 | .0 | .0 | .6 | .0 | .0 |
| 8. NW7 | 171. | 1.2 | .0 | .0 | .0 | .0 | .0 | .0 | .7 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .1 | .4 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 |
| 3. SW3 | .2 | .0 | .0 | .0 | .0 | .1 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .1 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .0 | .2 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 1ST STREET PM NP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 720 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 679 | 4.4 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1209 | 4.4 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1209 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1009 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 938 | 4.6 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1127 | 4.4 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1127 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 38 | 500 | 38 | AG | 2250 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 38 | 0 | 38 | AG | 2042 | 3.5 | .0 | 60.0 |
| K. WD | 0 | 38 | -500 | 38 | AG | 1790 | 2.5 | .0 | 45.0 |
| L. WE | -500 | 38 | -1500 | 38 | AG | 1790 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 1289 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 1116 | 3.3 | .0 | 75.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 1142 | 2.5 | .0 | 45.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 1142 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 41 | 4.4 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 71 | 4.4 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 23 | AG | 208 | 3.3 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 173 | 3.3 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 70 | 6.0 |
| 2. SE3 | 48 | -70 | 6.0 |
| 3. SW3 | -48 | -70 | 6.0 |
| 4. NW3 | -48 | 70 | 6.0 |
| 5. NE7 | 61 | 83 | 6.0 |
| 6. SE7 | 61 | -83 | 6.0 |
| 7. SW7 | -61 | -83 | 6.0 |
| 8. NW7 | -61 | 83 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.4 | .0 | .0 | .3 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 353. | 1.5 | .0 | .2 | .7 | .0 | .0 | .2 | .0 | .0 |
| 3. SW3 | 7. | 1.3 | .0 | .0 | .2 | .1 | .0 | .5 | .0 | .0 |
| 4. NW3 | 95. | 1.6 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 5. NE7 | 189. | 1.1 | .0 | .3 | .0 | .0 | .0 | .0 | .2 | .0 |
| 6. SE7 | 350. | 1.2 | .0 | .0 | .5 | .0 | .0 | .2 | .0 | .0 |
| 7. SW7 | 8. | 1.1 | .0 | .0 | .2 | .1 | .0 | .5 | .0 | .0 |
| 8. NW7 | 98. | 1.3 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .2 | .8 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .3 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .6 | .0 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 |

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JOB: GRAND AVENUE AND 1ST STREET PM WP
RUN: (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (FT)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

| LINK DESCRIPTION | LINK COORDINATES (FT) X1 | Y1 | X2 | Y2 | TYPE | VPH | EF (G/MI) | H (FT) | W (FT) |
|---|---|---|---|---|---|---|---|---|---|
| A. NF | 23 | -1500 | 23 | -500 | AG | 1050 | 2.3 | .0 | 50.0 |
| B. NA | 23 | -500 | 23 | 0 | AG | 982 | 4.4 | .0 | 45.0 |
| C. ND | 23 | 0 | 23 | 500 | AG | 1384 | 4.6 | .0 | 33.0 |
| D. NE | 23 | 500 | 23 | 1500 | AG | 1384 | 2.3 | .0 | 50.0 |
| E. SF | -23 | 1500 | -23 | 500 | AG | 1103 | 2.3 | .0 | 50.0 |
| F. SA | -23 | 500 | -23 | 0 | AG | 983 | 4.4 | .0 | 45.0 |
| G. SD | -23 | 0 | -23 | -500 | AG | 1230 | 3.9 | .0 | 33.0 |
| H. SE | -23 | -500 | -23 | -1500 | AG | 1230 | 2.3 | .0 | 50.0 |
| I. WF | 1500 | 38 | 500 | 38 | AG | 2435 | 2.3 | .0 | 65.0 |
| J. WA | 500 | 38 | 0 | 38 | AG | 2209 | 3.8 | .0 | 60.0 |
| K. WD | 0 | 38 | -500 | 38 | AG | 1901 | 2.6 | .0 | 45.0 |
| L. WE | -500 | 38 | -1500 | 38 | AG | 1901 | 2.3 | .0 | 65.0 |
| M. EF | -1500 | -38 | -500 | -38 | AG | 1451 | 2.3 | .0 | 65.0 |
| N. EA | -500 | -38 | 0 | -38 | AG | 1278 | 3.5 | .0 | 75.0 |
| O. ED | 0 | -38 | 500 | -38 | AG | 1524 | 2.5 | .0 | 45.0 |
| P. EE | 500 | -38 | 1500 | -38 | AG | 1524 | 2.3 | .0 | 65.0 |
| Q. NL | 0 | 0 | 15 | -500 | AG | 68 | 4.3 | .0 | 33.0 |
| R. SL | 0 | 0 | -15 | 500 | AG | 120 | 4.3 | .0 | 33.0 |
| S. WL | 0 | 0 | 500 | 23 | AG | 226 | 3.4 | .0 | 33.0 |
| T. EL | 0 | 0 | -500 | -23 | AG | 173 | 3.4 | .0 | 33.0 |

III. RECEPTOR LOCATIONS

| RECEPTOR | COORDINATES (FT) X | Y | Z |
|---|---|---|---|
| 1. NE3 | 48 | 70 | 6.0 |
| 2. SE3 | 48 | -70 | 6.0 |
| 3. SW3 | -48 | -70 | 6.0 |
| 4. NW3 | -48 | 70 | 6.0 |
| 5. NE7 | 61 | 83 | 6.0 |
| 6. SE7 | 61 | -83 | 6.0 |
| 7. SW7 | -61 | -83 | 6.0 |
| 8. NW7 | -61 | 83 | 6.0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE )

| RECEPTOR | BRG (DEG) | PRED CONC (PPM) | CONC/LINK (PPM) A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | 261. | 1.6 | .0 | .0 | .4 | .0 | .0 | .2 | .0 | .0 |
| 2. SE3 | 353. | 1.8 | .0 | .2 | .8 | .0 | .1 | .2 | .0 | .0 |
| 3. SW3 | 81. | 1.4 | .0 | .2 | .0 | .0 | .0 | .0 | .3 | .0 |
| 4. NW3 | 96. | 1.8 | .0 | .0 | .2 | .0 | .0 | .3 | .0 | .0 |
| 5. NE7 | 188. | 1.3 | .0 | .5 | .0 | .0 | .0 | .0 | .1 | .1 |
| 6. SE7 | 350. | 1.3 | .0 | .0 | .6 | .0 | .0 | .2 | .0 | .0 |
| 7. SW7 | 9. | 1.2 | .0 | .0 | .2 | .0 | .0 | .4 | .0 | .0 |
| 8. NW7 | 98. | 1.4 | .0 | .0 | .2 | .0 | .0 | .2 | .0 | .0 |

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

| RECEPTOR | CONC/LINK (PPM) I | J | K | L | M | N | O | P | Q | R | S | T |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1. NE3 | .0 | .2 | .5 | .0 | .1 | .0 | .0 | .0 | .0 | .0 | .0 | .0 |
| 2. SE3 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 3. SW3 | .2 | .1 | .0 | .0 | .0 | .1 | .4 | .0 | .0 | .0 | .0 | .0 |
| 4. NW3 | .1 | 1.0 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |
| 5. NE7 | .0 | .4 | .0 | .0 | .0 | .0 | .1 | .0 | .0 | .0 | .0 | .0 |
| 6. SE7 | .0 | .2 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 |
| 7. SW7 | .0 | .0 | .1 | .0 | .0 | .2 | .0 | .0 | .0 | .0 | .0 | .0 |
| 8. NW7 | .0 | .7 | .0 | .0 | .0 | .0 | .0 | .2 | .0 | .0 | .0 | .0 |

# V. Comment Letters and Responses to Comments

Letter No. 1

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

RECEIVED AUG 0 4 2006

July 31, 2006

Martha Welborne
Los Angeles Grand Avenue Authority
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Subject: The Grand Avenue Project
SCH#: 2005091041

Dear Martha Welborne:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 28, 2006, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

1-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

# Document Details Report
# State Clearinghouse Data Base

**SCH#** 2005091041
**Project Title** The Grand Avenue Project
**Lead Agency** Los Angeles Grand Avenue Authority

**Type** EIR Draft EIR

**Description** The proposed project includes the creation of a Civic Park that improves and expands upon the existing Los Angeles County Civic Mall, streetscape improvements along Grand Avenue between Fifth Street and Cesar Chavez Avenue to attract and accomodate more pedestrian traffic; and the development of five parcels. The project consists of two development options: the Project with County Office Building Option and the Project with Additional Residential Development Option. Under the Projet with County Office Building Option, up to 2,060 residential units, including up to 412 affordable units; up to 449,000 square feet of retail floor area; up to 275 hotel rooms; and a County Office Building containing up to 681,000 square feet, would be cosntructed. Under the Project with Additional Residential Development Option, up to 2,660 residential units, including up to 532 affordable units; up to 449,000 square feet of retail floor area, and up to 275 hotel rooms would be constructed. The County Office Building would not be constructed under the Project with Additional Residential Development Option. The total floor area to be developed under both Options is 3.6 million square feet. All proposed parking would be provided in podium and subterranean parking structures.

## Lead Agency Contact


**Name** Martha Welborne
**Agency** Los Angeles Grand Avenue Authority
**Phone** 213-452-6219 **Fax**
**email**
**Address** 445 South Figueroa Street, Suite 3400
**City** Los Angeles **State** CA **Zip** 90071


## Project Location

1-1

**County** Los Angeles
**City** Los Angeles, City of
**Region**
**Cross Streets** Grand Ave, Hope St, Olive St, Hill St, Spring St, Broadway, 1st St, 2nd, 3rd, 4, 5th, 6th, etc.
**Parcel No.**
**Township** **Range** **Section** **Base**

## Proximity to:

**Highways** SR110, US 101
**Airports**
**Railways** Metro, Amtrak
**Waterways** Los Angeles River
**Schools** LAUSD (multiple)
**Land Use** Parking and Park / C2-4D, R5-4D, OS-2D / Regional Center Commercial and Open Space

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Supply; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Department of Health Services; Integrated Waste Management Board; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

**Date Received** 06/14/2006 **Start of Review** 06/14/2006 **End of Review** 07/28/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

# V. RESPONSES TO COMMENTS
## A. WRITTEN COMMENTS

## LETTERS FROM STATE OF CALIFORNIA AGENCIES

### LETTER NO. 1

State of California
Governor's Office of Planning and Research (July 31, 2006)
State Clearinghouse and Planning Unit
Terry Roberts, Director
P.O. Box 3044 1400 Tenth Street
Sacramento, CA 95812-3044

### RESPONSE NO. 1-1

Thank you for your letter acknowledging that the Los Angeles Grand Avenue Authority (the "Authority) has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

It is understood that the Governor's Office of Planning and Research provided copies of the Draft EIR to thirteen state agencies and departments for review:

- Resources Agency
- Department of Fish and Game, Region 5
- Office of Historic Preservation
- Department of Parks and Recreation
- Department of Water Resources

- Office of Emergency Services
- California Highway Patrol
- Caltrans, District 7
- Department of Housing and Community Development
- Department of Health Services
- Integrated Waste Management Board
- Regional Water Quality Control Board, Region 4
- Native American Heritage Commission

Letter No. 2

STATE OF CALIFORNIA

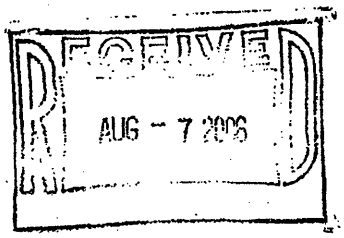
Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

August 3, 2006




Martha Welborne
Los Angeles Grand Avenue Authority
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Subject: The Grand Avenue Project
SCH#: 2005091041

Dear Martha Welborne:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on July 28, 2006. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project. 2-1

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2005091041) when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7
100 MAIN STREET, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337
TTY (213) 897-4937

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July 31, 2006

IGR/CEQA cs/060612 –DEIR
City of Los Angeles
The Grand Avenue Project
Grand Avenue/Civic Center
Vic. LA-101-1.30; SCH # 2005091041

Ms. Martha Welborne
The Grand Avenue Authority
c/o California Community Foundation
445 S. Figueroa St., Suite 3400
Los Angeles, California 90071

Clear 7-28-06 LAFC

RECEIVED
AUG 03 2006
STATE CLEARING HOUSE

Dear Ms. Welborne:

Thank you for including the California Department of Transportation in the environmental review process for The Grand Avenue Project Draft Environmental Impact Report. The project implementation plan involves development of 4 publicly owned parcels and 1 privately owned parcel along Grand Avenue within the Los Angeles Civic Center area. The Grand Avenue project site includes the US-101 - Hollywood Freeway near the northern boundary and I-110 - Harbor Freeway along the western boundary. The project with County building option consists of up to 2060 residential condominium units with 20% affordable housing, up to 275 room hotel, up to 449,000 sq. ft. of retail space, up to 681,000 sq. ft. of County offices. Under the additional residential option, the County office space would be replaced by up to 600 additional residential units, with 20% affordable units. Based on the information received, we have the following comments:

Items 1b: 2-1

The project traffic analysis indicates (as shown in table 23 and 24, pages 281 and 282) that the project trip generation would cause an incremental increase in the volume/capacity ratio of 0.021 for the US-101 Hollywood Freeway between Grand Avenue and Hill Street and an V/C ratio of 0.020 at the US-101 Hollywood Freeway north of Vignes Street. Both locations are for the southbound direction on the US-101 Freeway during the PM peak period as indicated on Page 243. If the volume to capacity ratio is greater than or equal to 0.02, the additional traffic volumes will cause or worsen the existing level-of-service (LOS) "F" condition.

We ask that you consider having developers contribute to a fair-share funding program to be used for constructing an additional freeway lane by widening the freeway or if feasible, modifying the lane striping for the southbound US-101 Freeway.

We recommend that construction related truck trips be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will nee a Caltrans Transportation Permit.

Any work to be performed within Caltrans Right-of-way will need a Caltrans Encroachment Permit.

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/060612 and do not hesitate to contact me at (213) 897-3747. 2-1

Sincerely,

*Original Signed By*

Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

## LATE LETTER

## LETTER NO. 2

State of California
Governor's Office of Planning and Research (August 3, 2006)
State Clearinghouse and Planning Unit
Terry Roberts, Director
P.O. Box 3044 1400 Tenth Street
Sacramento, CA 95812-3044

## RESPONSE NO. 2-1

Thank you for attaching and forwarding the California Department of Transportation's (Caltrans) letter commenting on the Draft EIR for the Grand Avenue Project. As noted in the State Clearinghouse letter, the version of the Caltrans letter forwarded by the State Clearinghouse was not received during the Draft EIR's public review period, which closed on July 28, 2006. The State Clearinghouse letter cites the Lead Agency's responsibility in responding to late letters and states that CEQA does not require the Lead Agency to respond to letters that are received after the closure of the reviewing period. However, the State Clearinghouse encourages the Lead Agency to consider late letters prior to final action on the Project. While this letter was received after the close of the public review period established by the State Clearinghouse for state agencies, Caltrans submitted the same letter directly to the Authority, which was received in a timely manner. The timely copy of Caltrans' letter is presented as Letter No. 3 of this Final EIR. The Authority has selected to respond to the comments raised by Caltrans in the context of Letter No. 3. As such, please refer to Response to Comment Nos. 3-1 through 3-5 for responses to all of the issues raised in Caltrans' letter.

Letter No. 3

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7
100 MAIN STREET, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337
TTY (213) 897-4937

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*Flex your power!*
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July 31, 2006

IGR/CEQA cs/060612 –DEIR
City of Los Angeles
The Grand Avenue Project
Grand Avenue/Civic Center
Vic. LA-101-1.30; SCH # 2005091041

Ms. Martha Welborne
The Grand Avenue Authority
c/o California Community Foundation
445 S. Figueroa St., Suite 3400
Los Angeles, California 90071

Dear Ms. Welborne:

Thank you for including the California Department of Transportation in the environmental review process for The Grand Avenue Project Draft Environmental Impact Report. The project implementation plan involves development of 4 publicly owned parcels and 1 privately owned parcel along Grand Avenue within the Los Angeles Civic Center area. The Grand Avenue project site includes the US-101 - Hollywood Freeway near the northern boundary and I-110 - Harbor Freeway along the western boundary. The project with County building option consists of up to 2060 residential condominium units with 20% affordable housing, up to 275 room hotel, up to 449,000 sq. ft. of retail space, up to 681,000 sq. ft. of County offices. Under the additional residential option, the County office space would be replaced by up to 600 additional residential units, with 20% affordable units. Based on the information received, we have the following comments: 3-1

Items 1b:

The project traffic analysis indicates (as shown in table 23 and 24, pages 281 and 282) that the project trip generation would cause an incremental increase in the volume/capacity ratio of 0.021 for the US-101 Hollywood Freeway between Grand Avenue and Hill Street and an V/C ratio of 0.020 at the US-101 Hollywood Freeway north of Vignes Street. Both locations are for the southbound direction on the US-101 Freeway during the PM peak period as indicated on Page 243. If the volume to capacity ratio is greater than or equal to 0.02, the additional traffic volumes will cause or worsen the existing level-of-service (LOS) "F" condition. 3-2

We ask that you consider having developers contribute to a fair-share funding program to be used for constructing an additional freeway lane by widening the freeway or if feasible, modifying the lane striping for the southbound US-101 Freeway.

We recommend that construction related truck trips be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will nee a Caltrans Transportation Permit. 3-3

Any work to be performed within Caltrans Right-of-way will need a Caltrans Encroachment Permit. 3-4

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/060612 and do not hesitate to contact me at (213) 897-3747. 3-5

Sincerely,

Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

**LETTER NO. 3**

State of California
Department of Transportation
District 7
Cheryl J. Powell, IGR/CEQA Program Manager
100 Main Street, Suite 100
Los Angeles, CA 90012-3606

**RESPONSE NO. 3-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the California Department of Transportation (Caltrans). As cited in the comment, the Project incorporates the County Office Building Option and the Additional Residential Development Option. A duplicate copy of Caltrans' letter was also received from the State Clearinghouse. As the copy of Caltrans' letter that was forwarded to the Authority by the State Clearinghouse was received after the close of the Draft EIR's public review period, the Authority has selected to respond to Caltrans' comments in the context of Letter No. 3. As such, the balance of the comments provided in this letter is addressed as Response Nos. 3-2 through 3-5.

**RESPONSE NO. 3-2**

The comment correctly describes the fact that the Project, as concluded in the Draft EIR, would increase the V/C ratio at two locations on the regional freeway system in the P.M. peak hour by 0.021 and 0.020 respectively, and that, because the threshold for a significant impact is an increase of 0.020 or more, the Project would therefore cause two significant traffic impacts (as the increase would be equal to or marginally above the threshold). This applies for the Project with County Office Building Option. It should also be noted that for the Project with Additional Residential Development Option, there would be no significant traffic impacts on the regional freeway system (Draft EIR, Tables 25 and 26, pages 284 to 285).

With respect to the suggestion in the comment for a fair share contribution to "... an additional freeway lane by widening or if feasible modifying the lane striping on the southbound US-101 Freeway," no Caltrans programs or improvements to this section of freeway are known to be feasible or adopted at the present time, nor is there any Caltrans established nexus-based fair share funding program in existence. As a result, no fair share contributions are applicable.

**RESPONSE NO. 3-3**

The comment recommends that construction-related truck trips be limited to off-peak commute periods. As noted in the Draft EIR, truck traffic would be expected to be evenly distributed across the workday, with most truck traffic occurring during off-peak hours and few trips occurring in the P.M. peak hour (Draft EIR, Vol. 1, Section IV.B, Traffic and Circulation, page 254). The Draft EIR concludes that, typically because of the low volume of trips and the fact that truck trips would generally occur outside the peak hours, the impact of truck trips during these periods is not expected to be significant. However, the Draft EIR also conservatively concludes that for the initial periods of construction when truck trips are at their highest, since some truck traffic is anticipated during the A.M. peak hour, that truck traffic would be potentially significant for those times. The Project would comply with the requirements of the City of Los Angeles with regard to construction related truck trips, including any relevant provisions in the Construction Traffic Control/Management Plan (Mitigation Measure B-1).

This comment also states that the transport of over-size or over-weight vehicles on State highways would require a Caltrans Transportation Permit. As such, the Project Developer would obtain and meet the requirements of the applicable Caltrans Transportation Permit.

**RESPONSE NO. 3-4**

The Caltrans letter states that any work performed within the Caltrans right-of-way would need a Caltrans Encroachment Permit. As such, the Project Developer would obtain and meet the requirements of the applicable Caltrans Encroachment Permit if Project construction requires work within Caltrans' right-of-way.

**RESPONSE NO. 3-5**

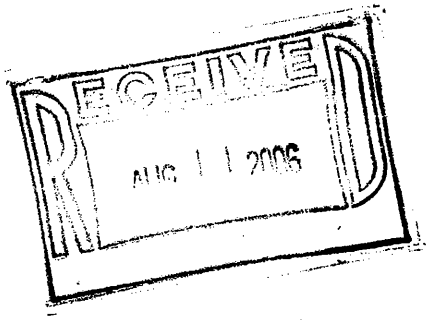
The comment provides the Department of Transportation's contact information and states that, if any additional questions regarding Caltrans' comments arise, the Authority may contact Caltrans utilizing the information presented in the comment.

Letter No. 4

State of California – The Resources Agency ARNOLD SCHWARZENEGGER, *Governor*

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

August 8, 2006




Ms. Martha Wellborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

**Draft Environmental Impact Report for**
**The Grand Avenue Project**
**Los Angeles County**

Dear Ms. Wellborne:

The Department of Fish and Game (Department) has reviewed the Draft Environmental Impact Report (DEIR) for the above referenced proposed project relative to impacts to biological resources. The project proposal includes the development of a revitalized Civic Park and development of five additional parcels. The project is located in downtown Los Angeles. The project site consists of the Grand Avenue Right-of-Way, between 5th Street and Cesar Chavez Avenue, the Los Angeles Civic Center Mall, between Spring Street and Grand Avenue, and five non-contiguous parcels located in the Bunker Hill Redevelopment Project Area. 4-1

*The following statements and comments have been prepared pursuant to the* Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under the California Environmental Quality Act (CEQA), Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq) and Fish and Game Code Section 1600 et seq.: 4-2

**IMPACTS TO BIOLOGICAL RESOURCES**

1. Impacts to Nesting Native Birds - The IS states that the project may result in the removal or relocation of mature landscaping, including trees.

   a. The proposed project may impact native bird species. Urban landscaping is often the only habitat available for migratory nongame native bird species and are used as migratory stopover sites and nesting habitat. Migratory nongame native birds are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918(50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). 4-3

   b. Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the *breeding bird season which generally runs from March 1- August 31 and as*

early as February 1 for raptors. The provision will help to avoid take, including disturbances which would cause abandonment of active nests containing eggs and/or young. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

c. If project activities cannot be scheduled to avoid the breeding bird season, the Department recommends that beginning thirty days prior to the disturbance of suitable nesting habitat the project proponent should arrange for weekly bird surveys to detect any protected native birds in the habitat that is to be removed, and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors). The surveys should be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys should continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/ construction work. If a protected native bird is found, the project proponent should delay all clearance/ construction disturbance activities in suitable nesting habitat or within 300 feet of nesting habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a biological monitor should be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. 4-3

The distance limits of construction to avoid a nest should be identified in the field with flagging and stakes or construction fencing. Construction personnel should be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above, in order to document compliance with applicable State and federal laws pertaining to the protection of native birds.

The Department recommends that the above concerns be addressed prior to lead agency approval of the proposed project.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Associate Wildlife Biologist, at (626) 797-3170.

Sincerely,

for Larry L. Eng, Ph.D.
Regional Manager

**LATE LETTER**

**LETTER NO. 4**

State of California
Department of Fish and Game (August 8, 2006)
South Coast Region
Larry L Eng, PhD, Regional Manager
4949 Viewridge Avenue
San Diego, CA 92123

**RESPONSE NO. 4-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the California Department of Fish and Game. As cited in the Department's letter, the Project includes the revitalization and expansion of the existing Civic Mall in downtown Los Angeles to create a newly formed "Civic Park." The expansion area involves the incorporation of an existing parking lot at the east end of Civic Mall.

**RESPONSE NO. 4-2**

The comment introduces statements and comments pursuant to the Department of Fish and Game's authority as a Trustee Agency with jurisdiction over natural resources affected by the Project in accordance with CEQA Section 15386 and pursuant to its authority as a Responsible Agency under CEQA Section 15381.

**RESPONSE NO. 4-3**

The Department of Fish and Game comment provides information regarding the importance of urban landscaping as often providing the only habitat available for migratory non-game native bird species as they travel the area. As discussed in the comment, the California Fish and Game Code prohibits the take of all birds and their active nests including raptors and non-game birds listed in the Federal Migratory Bird Treaty Act (MBTA). The comment also states that construction activities, including potential disturbances to native and non-native vegetation, structures, and substrates should take place outside of the breeding bird season to avoid the potential abandonment of active nests containing eggs and/or the young and recommends that these concerns be addressed prior to the Authority's approval of the Project.

The discussion of the potential impacts to biological resources by the Department of Fish and Game is incorporated into this Final EIR, Section II, Corrections and Additions, Section IV.A, Land Use. The presence of migratory birds, including raptors, and their nests potentially occurs within any urban area and, as such, all construction in an urban area must comply with the regulations set forth in the California Fish and Game Code. While it is not feasible to schedule construction, including excavation and removal of the Civic Mall's existing trees to avoid the breeding bird season, which generally runs from March 1-August 31 (or as early as February 1 for raptors), the Project would comply with the provisions of the MBTA in regard to active nests. Destruction of unoccupied nests, or bird mortality resulting indirectly from a project, would not represent an MBTA violation. The EIR has been revised to include the regulatory measure. In that regard, it should be noted that there are little to no trees on the five development parcels given their developed status as parking lots. In light of that fact, and with the implementation of all applicable regulatory measures, no significant impacts with respect to migratory birds would occur.

> **Regulatory Measure A-1:** Project construction involving the clearance of on-site vegetation, excavation, or other construction activities shall avoid, to the extent feasible, from occurring between March 1 and August 31 (and between February 1 and August 31 for raptors). Prior to the completion of final plans and specifications for the Civic Park, the County Chief Administrative Officer (CAO) or designee shall review the plans and specifications to ensure that the contractor is apprised of the requirements of the Migratory Bird Treaty Act and encouraged to schedule removal or relocation of mature trees and removal of other potential nesting habitat outside of the breeding season. In the event that the identified construction activities must occur within the specified time period, a qualified biologist acceptable to the County CAO or designee shall complete weekly surveys within the Civic Park site that is subject to disturbance, and within 500 feet of the boundary of such areas, to determine if any protected native birds are present. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If an active nest is located within trees or other habitat scheduled for removal or relocation, or within 300 feet of the construction area, construction shall be suspended within 300 feet of the nest (500 feet for raptor nests) until such time as a qualified biologist determines if construction activities are interfering with nesting activities. If construction activities are determined to not interfere with nesting activities, construction may continue with a biological monitor present. Should a tree or other habitat scheduled for removal or relocation be determined to contain an active nest, removal or relocation shall be delayed until the nest is determined to be inactive or a permit is granted by the USFWS for take pursuant to the MBTA.

> The distance limits of construction to avoid a nest shall be identified in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area. The County CAO or designee shall record the results of the protective measure above.

The new regulatory measure and associated revised text is presented in Section II, Corrections and Additions of this Final EIR.

The Department of Fish and Game in this comment also provides a contact person and telephone number for any questions regarding these comments and further coordination of issues associated with migratory birds or raptors.

Letter No. 5

SOUTHERN CALIFORNIA

**ASSOCIATION of GOVERNMENTS**

**Main Office**

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

**Officers:** President: Yvonne B. Burke, Los Angeles County • First Vice President: Gary Ovitt, San Bernardino County • Second Vice President: Richard Dixon, Lake Forest • Immediate Past President: Toni Young, Port Hueneme

**Imperial County:** Victor Carrillo, Imperial County • Jon Edney, El Centro

**Los Angeles County:** Yvonne B. Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Jim Aldinger, Manhattan Beach • Harry Baldwin, San Gabriel • Paul Bowlen, Cerritos • Todd Campbell, Burbank • Tony Cardenas, Los Angeles • Stan Carroll, La Habra Heights • Margaret Clark, Rosemead • Gene Daniels, Paramount • Mike Dispenza, Palmdale • Judy Dunlap, Inglewood • Rae Gabelich, Long Beach • David Gafin, Downey • Eric Garcetti, Los Angeles • Wendy Greuel, Los Angeles • Frank Gurulé, Cudahy • Janice Hahn, Los Angeles • Isadore Hall, Compton • Keith W. Hanks, Azusa • José Huizar, Los Angeles • Tom LaBonge, Los Angeles • Paula Lantz, Pomona • Paul Nowatka, Torrance • Pam O'Connor, Santa Monica • Alex Padilla, Los Angeles • Bernard Parks, Los Angeles • Jan Perry, Los Angeles • Ed Reyes, Los Angeles • Bill Rosendahl, Los Angeles • Greig Smith, Los Angeles • Tom Sykes, Walnut • Paul Talbot, Alhambra • Mike Ten, South Pasadena • Tonia Reyes Uranga, Long Beach • Antonio Villaraigosa, Los Angeles • Dennis Washburn, Calabasas • Jack Weiss, Los Angeles • Herb J. Wesson, Jr., Los Angeles • Dennis Zine, Los Angeles

**Orange County:** Chris Norby, Orange County • Christine Barnes, La Palma • John Beauman, Brea • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Leslie Daigle, Newport Beach • Richard Dixon, Lake Forest • Paul Glaab, Laguna Niguel • Marilynn Poe, Los Alamitos

**Riverside County:** Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

**San Bernardino County:** Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wapner, Ontario

**Ventura County:** Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

**Orange County Transportation Authority:** Lou Correa, County of Orange

**Riverside County Transportation Commission:** Robin Lowe, Hemet

**Ventura County Transportation Commission:** Keith Millhouse, Moorpark

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3 August 2006

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Ste 3400
Los Angeles, CA 90071

RE: SCAG Comments on the Notice of Availability of a Draft Environmental Report for the Grand Avenue Project
SCAG No. I 20060408

Dear Ms. Welborne:

Thank you for submitting the Draft Environmental Impact Report for the Grand Avenue Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans.

SCAG staff has evaluated your submission for consistency with the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). In Volume 2, Section IV, the draft EIR addresses SCAG's policies and forecasts appropriately and has provided sufficient explanation of how the project helps meet and support regional goals. Based on the information provided in the EIR we have no further comments. 5-1

A description of the proposed Project was published in the June 16-30, 2006 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have questions, please feel free to contact me at (213) 236-1858. Thank you.

Sincerely,

April Grayson
Associate Regional Planner
Intergovernmental Review

DOCS# 125268

## LETTERS FROM REGIONAL AGENCIES

### LETTER NO. 5

Southern California Association of Governments
April Grayson
Associate Regional Planner
Intergovernmental Review
818 West Seventh Street 12th Floor
Los Angeles, CA 90017-3435

### RESPONSE NO. 5-1

Thank you for your letter acknowledging the Southern California Association of Governments (SCAG) review of the Draft EIR and subsequent determination that the document addresses SCAG's policies and forecasts appropriately, and that the document provides sufficient explanation of how the Project helps meet and support regional goals. As stated in the comment, the Draft EIR analyzed the Project's consistency with the applicable goals and policies of SCAG's Regional Comprehensive Plan and Guide (RCPG) and Regional Transportation Plan (RTP) with respect to the Project. The evaluations of these documents are contained in Sections IV.A., Land Use, and IV.B. Transportation and Circulation in Volume 1 of the Draft EIR, respectively.

Letter No. 6

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Date: August 2, 2006

To: Ms. Martha Welborne
Los Angeles Grand Avenue Authority

From: Steve Smith, Ph.D. Steve Smith
Program Supervisor,
CEQA Section, SCAQMD

**Subject: The Grand Avenue Project DEIR**

South Coast Air Quality Management District (SCAQMD) staff intends to submit comments on the above-mentioned document by tomorrow, Friday, August 4, 2006. SCAQMD staff hopes you will consider the comments as part of the official record in finalizing the environmental impact report for the proposed project. 6-1

**LETTER NO. 6**

South Coast Air Quality Management District (August 2, 2006)
Steve Smith, PhD
Program Supervisor
CEQA Section, SCAQMD
21865 Copley Drive
Diamond Bar, CA 91765-4178

**RESPONSE NO. 6-1**

Thank you for your interest in the Project on behalf of the South Coast Air Quality Management District (SCAQMD). The comment states that a second SCAQMD letter will follow on Friday, August 4, 2006 and requests that it will be addressed by the Lead Agency. However, the SCAQMD's second letter was received by the Lead Agency by August 3, 2006, and is addressed as a timely letter (Letter No. 7).

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

**FAXED: AUGUST 3, 2006**

August 3, 2006

Ms. Martha Welborne
The Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

**Draft Environmental Impact Report (DEIR) for The Grand Avenue Project: Los Angeles: June 2006**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be willing to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments. 7-1

Sincerely

Steve Smith

Steve Smith
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
LAC060614-04
Control Number

**Draft Environmental Impact Report (DEIR) for**
**The Grand Avenue Project, Los Angeles: June 2006**

1. **URBEMIS Model Results**: In footnote (a) to Table 57, the lead agency states that the construction emissions quantities are taken from the URBEMIS model printout sheets and/or calculation worksheets presented in Appendix D. Please note that the URBEMIS model printout sheets in Appendix D do not include construction emissions. They show only operational emissions. As a result, SCAQMD staff could not verify construction emissions from the proposed project. Please provide the URBEMIS construction output printout in the Final EIR. 7-2

2. **Parcel Q**: On page 116 of the DEIR, there appears to be a typographical error regarding the area of Parcel Q, which is shown as 1.1.14 million square feet of space. 7-3

3. **Carbon Monoxide (CO) Hot Spots:** Table 59 on page 545 of the DEIR reports CO concentrations for the intersection of Figueroa Street and Third Street. However, a CO hotspots analysis was not found for this intersection in the appendices. SCAQMD staff is therefore unable to verify the CO hotspots analysis for this intersection. The Final EIR should include the details of the CO hotspots analyses for all intersections that are reported in the DEIR and that are impacted by the proposed project. 7-4

4. **Traffic Volumes:** The traffic volumes in the CO hotspots analysis do not appear to match those in the Traffic Report. The traffic volumes in the Final EIR should be consistent. 7-5

5. **Reducing Construction Emissions**: Because construction emissions from the proposed project are estimated to exceed the daily significance thresholds during construction for nitrogen oxides ($NO_X$), carbon monoxide (CO), volatile organic compounds (VOC) and particulate matter ($PM_{10}$), even after the implementation of the recommended mitigation measures as stated on page 566 of the DEIR, SCAQMD staff recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce air quality impacts from the proposed project. Given that the air basin is designated non-attainment with respect to ozone and $PM_{10}$, it is important that the lead agency consider these changes. 7-6

   - Mitigation Measure F-9 should be modified to include trucks not idling in excess of five minutes to be consistent with state law. 7-7
   - Mitigation Measure F-2 should be modified to consider restricting the number of gallons of coatings used per day. The lead agency should also encourage water-based coatings or coatings with a lower VOC content than 100 grams per liter. 7-8

Finally, consider using materials that do not need to be painted or are painted prior to transporting to the site. 7-8

SCAQMD staff recommends that the lead agency also consider the following mitigation measures where feasible: 7-9

- Provide temporary wind fencing around the sites that are being graded/excavated to reduce dirt/dust being blown over to adjoining properties.
- Provide a staging area off-site for construction workers and provide shuttle buses to convey workers to the project site from the staging area. 7-10
- Arrange for mobile food caterers to come to the project site during lunch break. 7-11
- Provide temporary traffic controls (e.g., flag person) during construction to ensure smooth traffic flows. 7-12
- Reroute construction trucks away from congested streets. 7-13
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity and all emissions related matters. Post a publicly visible sign with name of contact person and telephone number for dust complaints. 7-14

**LETTER NO. 7**

South Coast Air Quality Management District (August 3, 2006)
Steve Smith, PhD
Program Supervisor
CEQA Section, SCAQMD
21865 Copley Drive
Diamond Bar, CA 91765-4178

**RESPONSE NO. 7-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the South Coast Air Quality Management District (SCAQMD). As requested by the SCAQMD, the comments are evaluated as guidance and are incorporated in the Final EIR for the review and consideration of the Project's decision-makers. The comment also provides information as to the contact person who is willing to work with the Authority in addressing air quality issues.

**RESPONSE NO. 7-2**

The comment expresses the concern that the URBEMIS calculation sheets for construction emissions are not available in the Draft EIR. Based on a review of the data it is concluded that the SCAQMD misinterpreted Footnote (a) to Table 57, as the URBEMIS model was not used in the calculation of construction emissions. The URBEMIS model was used solely to develop the factors for mobile-source and fugitive dust emissions used in the construction analysis. Specifically, the calculation worksheets provide the construction schedule (e.g., equipment used for each phase, horsepower, and load factor for each piece of equipment) and emission calculations. As stated in the Draft EIR (Vol. 2, page 535), the methodology used for calculating daily regional emissions during construction was forecasted by applying the mobile-source and fugitive dust emissions factors derived from URBEMIS 2002. To further promote clarity, Footnote (a) to Table 57 has been revised to more clearly indicate the role of the URBEMIS model in the calculation of the Project's construction emissions. The new footnote is presented in Section II, Corrections and Additions of this Final EIR (Correction to page 535 of Draft EIR, Vol. 2, Section IV.A, Land Use). A complete set of calculation worksheets developed for the construction emissions analysis is contained in Appendix D-1.

**RESPONSE NO. 7-3**

The comment notes the typographical error on page 116 of the Draft EIR. The total floor area of proposed residential, retail, and hotel uses in Parcel Q has been changed from 1.1.14 million square feet to 1,231,937 square feet, which would be the same as the total floor area for Parcel Q as shown in the Proposed Land Use Summary (Draft EIR, Vol. 1, Table 1, page 115). The revised text, citing the correct total floor area is presented in Section IV, Corrections and Additions of this Final EIR. Since the revision is the correction of a typographical error, it does not change the conclusions in the Air Quality analysis, which are based on the correct floor area of 1,231,937 square feet.

**RESPONSE NO. 7-4**

The comment states that the carbon monoxide (CO) hotspots analysis for the intersection of Figueroa Street and Third Street was not included in Appendix D-3. The modeling output sheet for the hotspots analysis for this one intersection was inadvertently left out of the Draft EIR, due to a printing error. Per the SCAQMD's request, this model output sheet has been added to Appendix D-3 of the Draft EIR as a Correction and Addition. The analysis presented in Section IV.F., Air Quality, in Volume 1 of the Draft EIR incorporates the data contained in the missing output sheet. As such, simply adding the missing hotspots analysis modeling output sheet would not change the conclusions of the Draft EIR. The addition to Appendix D-3 is presented in Section II, Corrections and Additions of this Final EIR.

**RESPONSE NO. 7-5**

The comment confirms that the potential local CO impacts associated with traffic volumes, as shown in Table 59 (Draft EIR, Vol. 2, Section IV. F, Air Quality, pages 545-546), do not match the traffic levels in the Traffic Report. The air quality analysis presented in the Draft EIR was based on the traffic levels identified in the Traffic Report, however, the CALINE4 modeling output sheets provided in Appendix D-3 were inadvertently not updated to reflect the traffic volumes provided in the Traffic Report. Per the SCAQMD's request, all modeling sheets have been updated in the Final EIR to correspond to the traffic volumes provided in the Traffic Report. This correction to Appendix D-3 is presented in Section II, Corrections and Additions of this Final EIR. As the data in the revised CALINE4 modeling sheets now match the results presented in Section IV.F., Air Quality in Volume 1 of the Draft EIR, no change in the conclusions of the Draft EIR would occur. Further, it should be noted that all analyses confirm that the Project would not cause a significant impact due to local CO hotspots.

**RESPONSE NO. 7-6**

The comment restates the conclusions of the Draft EIR that operation and construction of the Project would exceed daily significance thresholds for $NO_X$, CO, VOC, and $PM_{10}$, after mitigation. The AQMD recommends that the Authority consider modifying specific mitigation measures and providing additional mitigation measures to further reduce the Project's air quality impacts, and states that it is important that the Authority consider these changes since the Basin is designated non-attainment with respect to ozone and $PM_{10}$. The mitigation measures listed by the SCAQMD and which they request the Lead Agency to consider where feasible are addressed individually below in Responses Nos. 7-7 through 7-15.

**RESPONSE NO. 7-7**

Item 1 - The AQMD recommends that Mitigation Measure F-9 be modified to include trucks not idling in excess of five minutes to be consistent with state law: Since this modification can be feasibly implemented, and would be consistent with state law, Mitigation measure F-9 has been modified to reflect this change. The revised mitigation measure now reads:

> **Mitigation Measure F-9:** During each construction phase, the Project Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that all construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO and/or designee shall determine compliance with this measure with regard to the Civic Park.

The correction to Mitigation Measure F-9 is presented in Section II, Corrections and Additions of this Final EIR.

**RESPONSE NO. 7-8**

Item 2 - Mitigation Measure F-2 should be modified to consider restricting the number of gallons of coatings used per day; the Lead Agency should also consider restricting the number of gallons of coatings used per day and should also encourage water-based coatings or coatings

with a lower VOC content than 100 grams per liter; and consider using materials that do not need to be painted, or that can be painted and, then, transported to the site.

The South Coast Air Quality Management District imposes the strictest rules in the nation with regard to the application of architectural paints and coatings. Specifically District Rule 1113 restricts volatile organic compounds (VOCs) which includes virtually all types of paints and coatings, including but not limited to, wood finishes, lacquers, concrete-curing compounds, fire-proofing exterior coatings, paints, floor coatings, coatings for signs, mastic coatings, roof coatings, stains, swimming pool coatings, wood preservatives, and water-proofing sealers. This rule is the result of considerable rule-making activity and reflects the most stringent industry-wide standards achievable in practice.

The Project Developer would comply with all SCAQMD Rules applicable to paints and other architectural surfaces and coatings since the SCAQMD has deemed only those measures feasible when it adopted them on a District-wide basis. .

**RESPONSE NO. 7-9**

Item 3 - Provide temporary wind fencing around the sites that are being graded or excavated to reduce dirt and dust from blowing into adjoining properties: Since this modification can be feasibly implemented, Mitigation Measure F-1 has been modified to include the following provision: "Provide temporary wind fencing, consisting of wrapped chain link or solid fencing, around the sites that are being graded/excavated to reduce dirt/dust from being blown over to adjoining properties." Mitigation Measure F-1, as amended, is presented in Section II, Corrections and Additions of this Final EIR.

**RESPONSE NO. 7-10**

Item 4 - Provide a staging area off-site for construction workers and provide shuttle buses to convey workers to the Project site from the staging area: As identified in the Draft EIR (Vol. 1, page 257), the Project Developer proposes to enter into some form of temporary arrangement with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off-street spaces for the construction workers during Project construction, and to require all construction workers to use these designated parking spaces. ] This program will be implemented by the Authority through all necessary conditions of approval and/or measures. Thus, a new mitigation measure has been added to the Final EIR, which requires that a shuttle service be provided if the remote parking

sites for construction workers are beyond 1,100 feet from the respective construction site. The new mitigation measure shall read:

> **Mitigation Measure F-11:** During each construction phase, the Project Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that shuttle service shall be provided to construction workers who are required to park in offsite parking lots, if such lots are not within a walking distance of 1,100 feet from the respective construction sites. The CRA/LA shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or designee shall determine compliance with this measure with regard to the Civic Park.
>
> This new mitigation measure (Mitigation Measure F-11) is presented in Section IV, Corrections and Additions of this Final EIR.

**RESPONSE NO. 7-11**

Item 5 - Arrange for mobile food caterers to come to the Project site during lunch break: It has been the experience of the CRA/LA on projects downtown that mobile food caterers make such a requirement unnecessary as they readily service the construction industry at breaks and lunch time. In addition to the mobile catering trucks, there are a number of eating establishments within walking distance of the Project site. It is highly likely that construction workers would eat at either those establishments or by purchasing food at a mobile catering truck and not use their cars to travel to a different eating facility since the construction workers' cars would be parked at designated lots located some distance away from the Project site.

**RESPONSE NO. 7-12**

Item 6 - Provide temporary traffic controls (e.g., flag person) during construction to ensure smooth traffic flows: The addition of flag personnel is an anticipated component of the Project's Construction Traffic Control/Management Plan (Mitigation Measure B-1) to be approved by LADOT. The Construction Traffic Control/Management Plan addresses a broad range of measures that address traffic congestion issues during Project construction, of which, the inclusion of temporary traffic controls (e.g., flag person) is but one component of this plan. Therefore, an additional mitigation measure addressing this issue would be redundant and is not required.

**RESPONSE NO. 7-13**

Item 7 - Reroute construction trucks away from congested streets: Issues relating to preferred travel routes for construction vehicles would be addressed via the selection of approved haul routes and may likely also be addressed by means of the Project's required Construction Traffic Control/Management Plan (Mitigation Measure B-1) to be approved by LADOT. Typically construction truck traffic is routed via the most direct routes to the freeways that most closely serve the Project site, thereby minimizing truck impacts on local streets. The Draft EIR identifies that "Most construction truck traffic would be freeway-oriented and use the Hollywood and Harbor Freeways, which are only two to three blocks from the Project site" (see page 254 in Volume 1 of the Draft EIR). The likely routes to/from these freeways would be by Grand Avenue and Hope Street to/from the Hollywood Freeway and by Third Street and Fourth Street/Lower Grand Avenue to/from the Harbor Freeway. Also, as identified in the Draft EIR, (see page 254 in Volume 1 of the Draft EIR), the majority of truck traffic would occur outside of the A.M. and P.M. peak hours when the streets are not congested.

The Project would comply with the requirements of the City of Los Angeles with regard to construction related truck trips, including any relevant provisions in the Construction Traffic Control/Management Plan (Mitigation Measure B-1).

**RESPONSE NO. 7-14**

Item 8 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity and all emissions related matters; post a publicly visible sign with the name of contact person and telephone number for dust complaints: The establishment of a construction relations officer to act as a community liaison regarding on-site construction activities is established under Mitigation Measure G-7 (refer to page 60 of Volume 1 of the Draft EIR).

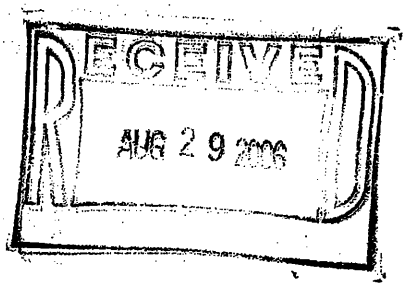
# COUNTY OF LOS ANGELES

Letter No. 8

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330




P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

August 21, 2006

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
C/O - California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

**DRAFT ENVIRONMENTAL IMPACT REPORT, GRAND AVENUE PROJECT "LOS ANGELES CITY" – (FFER #200600123)**

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, and Forestry Division of the County of Los Angeles Fire Department. The following are their comments:

**LAND DEVELOPMENT UNIT:**

1. This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the County of Los Angeles Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the County of Los Angeles Fire Department. 8-1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY
CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY
DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLENDORA
HAWAIIAN GARDENS
HAWTHORNE
HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA-FLINTRIDGE
LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA
LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA
POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA
SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOI
WESTLAKE VILLAC
WHITTIER

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed. 8-1

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

David R. Leininger

DAVID R. LEININGER, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

DRL:lc

## LETTERS FROM COUNTY OF LOS ANGELES AGENCIES

## LATE LETTER

## LETTER NO. 8

County of Los Angeles Fire Department
David R. Leininger
Chief, Forestry Division
Prevention Services Bureau
County of Los Angeles Fire Department
1320 North Eastern Avenue
Los Angeles, CA 900763-3294

### RESPONSE NO. 8-1

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Los Angeles County Fire Department. The comment states that the Project is located entirely within the City of Los Angeles and that the City of Los Angeles Fire Department would have jurisdiction concerning this Project and would be setting the Project's conditions of approval. The comment also notes that the Project is located in close proximity to the jurisdictional area of the County of Los Angeles Fire Department but that it is unlikely to have an impact that requires a comment concerning general requirements from the Land Development Unit of the County Fire Department. The Draft EIR evaluated the impact of the Project with respect to City of Los Angeles Fire Department and incorporates the regulatory measures provided by the City Fire Department Bureau of Fire Prevention and Public Safety (Vol. 2, Section IV.I.1, Regulatory Measures I.1-1 through I.1-30, pages 630 through 636). The comment also states that the areas germane to the statutory responsibilities of the County Fire Department, Forestry Division, have been addressed. The comment also provides a contact person and telephone number for any further questions.

Letter No. 9

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

# Metro

August 3, 2006,

Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa St., Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

Thank you for the opportunity to comment on the Draft EIR for the Grand Avenue Project. This letter conveys recommend ations from the Lo s Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project. 9-1

Though the Traffic Impact Analysis (TIA) satisfies the requirements of the 2004 CMP Guidelines, the following should be included in the Final EIR:

1. Table 5-7, "Public Transit Service Capacit y Serving the Projec t Area", of the Traffic Study summarizes transit servic e and calculates bus capacity using 55 persons per vehicle. The average seating capacity of Metro buses is 40 seats. Metro's existing acceptable load factor and scheduled capacity with standees is 49 persons per vehicle. Performing the calculation with 55 persons per vehicle overstates Metro's transit capacity. Furt her, the transit capacity stated does not consider whether those seats are filled as they enter the project area; a net capacity comparison cannot be made. 9-2
2. Table 5-7, "Public Transit Service Capac ity Serving the Proj ect Area", omits Foothill Transit Lines 480, 482, and 486. 9-3
3. Considering the overall availability of bus transit service, and the future development of rail in the downtown area, including the Metro Gold Line Eastern Extension, the Exposition Light Rail Transit Project, and other rail projects under consideration, it can be concluded that regional transit capacity would not be exceeded bythe proposed projects. 9-4
4. LADOT's DASH B and C Shuttle servic es operating along Grand Avenue and Olive Streets might be negatively impacted by new riders desiring to travel short distances within the Project Ar ea, attracted by DASH's low fare. 9-5
5. The development of the Civic Center Park and the scheduling of annual events, festivals, parades and demonstrations causing significant and unavoidable traffic impacts could be mi tigated though theuse of changeable message signs similar to those in stalled near Staples Center. 9-6
6. All proposed projects and developments should accommodate easy access to and from the Metro Red Line station portals. 9-7
7. Construction activities associated wi th the proposed projects must not interfere with the structu ral and systems integrity of the Metro Red Line. 9-8

8. The construction and operation of the proposed projects, including special events at Civic Center Park, must not be allowed to disrupt the operation and maintenance activities of the Metro Red Line. These activities take place 24 hours a day, seven days a week. 9-9
9. As noted on page 108 of the Traffic Report, construction of Parcel L/M-2 might require the temporary relocation of the southbound Grand Avenue stop farside of 2nd Street. For the convenience of passengers who utilize the local and express services along Grand Avenue, the 2nd Street stop may need to be temporarily relocated back to 1st Street adjacent to the Disney Hall. Forcing patrons destined for locations north of 2nd Street, including those who formally used the 1st Street stop, to travel farther south from their destinations will be an undue burden. The Grand Avenue stop farside of 2nd Street should be continued to the extent possible. 9-10

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address: 9-11

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,

Susan F. Chapman
Program Manager, Long Range Planning

**LETTER NO. 9**

Metropolitan Transportation Authority
Susan Chapman
Program Manager
Long Range Planning
One Gateway Plaza
Los Angeles, CA 90012-2952

**RESPONSE NO. 9-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Metropolitan Transportation Authority (LACMTA). The LACMTA comment conveys recommendations concerning issues considered germane to LACMTA's statutory responsibilities in relation to the proposed Project. The comment confirms that the Traffic Impact Analysis (TIA) in the Draft EIR satisfies the requirements of the 2004 CMP Guidelines, although additional information should be included in the Final EIR. The requested additional information is addressed in Response Nos. 9-2 through 9-10.

**RESPONSE NO. 9-2**

The CMP transit analysis has been updated using 49 persons per vehicle as the capacity of buses rather then the 55 persons used in the Draft EIR. This is reflected in revised Table 5-7 and revised text on page 99 of Appendix B of the Draft EIR (Traffic Study), and results in the peak hour transit service capacity directly serving the Project site being 21,915 rather then the 23,140 stated in the Draft EIR, and a peak hour transit service capacity serving the Bunker Hill/Civic Center area of 34,780 rather than the 36,000 stated in the Draft EIR. For the Project with County Office Building Option, the peak direction total of 661 Project transit trips would represent 3.0 percent of the 21,915 person trip transit capacity for the Project area, rather than the 2.9 percent of the 23,140 capacity stated in the Draft EIR; and would represent 1.9 percent of the 34,780 person trip transit capacity for the Project area, rather than the 1.8 percent of the 34,780 capacity stated in the Draft EIR (Draft EIR Appendix B, page 99). The results of the Draft EIR analysis would therefore change very slightly but the conclusions would remain the same for the Project with County Office Building Option, i.e. there would be no significant transit impacts.

For the Project with Additional Residential Development Option, the peak direction total of 200 Project transit trips would represent 0.9 percent of the 21,915 person trip transit capacity

for the Project area, the same percentage as the 0.9 percent of the 23,140 capacity stated in the Draft EIR; and would represent 0.6 percent of the 34,780 person trip transit capacity for the Project area, the same percentage as the 0.6 percent of the 34,780 capacity stated in the Draft EIR (Draft EIR Appendix B, page 120). The results of the Draft EIR analysis would therefore not change and the conclusions would remain the same for the Project with Additional residential Development Option, i.e. there would be no significant transit impacts. The changes described above have also been made to the text on page 286 of the Draft EIR. The additions and corrections to Draft EIR, Vol. 3, Appendix B, page 99 (Table 5-7) and Draft EIR Vol. 1, Section IV. B, page 286, is presented in Section II, Corrections and Additions of this Final EIR.

While it is true that the stated transit capacity does not consider whether seats are filled as they enter the Project area, the Draft EIR concluded that the new transit ridership generated by the Project would constitute very small proportions of the overall transit capacity such that it would not cause the transit capacity to be substantially exceeded (the significant impact threshold identified in Draft EIR, Appendix B, page 99). This comment letter, in point number 3, confirms that the regional transit capacity would not be exceeded by the proposed Project.

**RESPONSE NO. 9-3**

Table 5-7, Public Transit Service Capacity Serving the Project Area, in Appendix B of the Draft EIR has been updated to reflect the inclusion of Foothill Transit Lines 480, 482, and 486 as identified in this comment. As this correction increases the regional transit capacity serving the area, this addition does not change the conclusion in the Traffic Study that the Project would not cause the transit capacity to be substantially exceeded and therefore that the Project would not cause significant transit impacts. The additions and corrections to Draft EIR, Vol. 3, Appendix B, page 99 (Table 5-7), is presented in Section II, Corrections and Additions of this Final EIR. The inclusion of the Foothill Transit lines in Table 5-7 does not change the conclusion in the Draft EIR that the Project would have a less than significant impact with respect to transit services.

**RESPONSE NO. 9-4**

This comment confirms the conclusion stated on page 286 of Volume 1 of the Draft EIR as well as pages 99 and 103 of Appendix B in the Draft EIR that the Proposed Project would not cause the total transit capacity in the downtown to be exceeded.

**RESPONSE NO. 9-5**

The Draft EIR identifies the following threshold of significance for the CMP Transit analysis to which the comment refers: "Based on the City of Los Angeles CEQA Threshold Guide, a significant impact would occur if projected transit riders substantially exceed available transit capacity" (Vol. 1, page 244). The Draft EIR analysis addressed the total transit capacity serving the Project area. The projection of potential use of transit by individual bus lines is not realistically possible at this early stage of planning for the Project. In addition, LADOT is currently in the process of studying and potentially modifying DASH service in the downtown area, so detailed future service parameters and capacity cannot be reliably predicted at this time, other than as part of the overall estimates of transit capacities for all transit service in the Project and downtown areas. As stated in the response to Comment No. 9-2, above, it is concluded in the Draft EIR that the Project would not cause the total transit capacity in the downtown area to be exceeded. Further, it should also be noted that given the location of the Project in close proximity to jobs and many other destinations in the downtown area, a number of the short trips to and from the Project may be walking trips.

**RESPONSE NO. 9-6**

The changeable message signs installed near STAPLES Center are operated for both STAPLES Center and the Los Angeles Convention Center. STAPLES Center hosts almost 300 events a year, and the Convention Center also hosts regular events, both with very predictable traffic and parking patterns. Civic Park events are addressed in the Draft EIR on pages 246, and 275-277. The number of comparably sized events at the Civic Park is expected to be much lower, far more sporadic, and less similar in nature. Page 277 of the Draft EIR identifies that Civic Park major events are more temporary and short-term, and would typically be most effectively addressed, at the discretion of the Los Angeles Department of Transportation (LADOT) or other appropriate agencies, by the preparation of special traffic and management and control plans on a temporary basis as are currently prepared for special events as deemed necessary by LADOT (which sometimes include portable changeable message signs as appropriate).

**RESPONSE NO. 9-7**

The Project site includes portals to the Civic Center Station on the Metro Red Line on the northeast corner of Parcel W-2 (at Hill Street and First Street), and in the Court of Flags in the Civic Park (on the east side of Hill Street between First Street and Temple Street). Mitigation Measure B-6 (page 319 of the Draft EIR) commits the Project developer to providing enhanced

walking connections along Project street frontages to all transit servicing the Project site, including these station portals.

**RESPONSE NO. 9-8**

The Project developer would coordinate further with Metro during both the design and construction phases of the Project in order to avoid interference with the structural and systems integrity of the Metro Red Line.

**RESPONSE NO. 9-9**

Mitigation Measure B-1 calls for the development and implementation of a Construction Traffic Control/Management Plan to be approved by LADOT, including the maintenance of safe and adequate pedestrian access to adjacent land uses including the Metro Red Line station. As such, the required Construction Traffic Control/Management Plan would not disrupt the operation and maintenance activities of the Metro Red Line.

**RESPONSE NO. 9-10**

The comment's concern on the specific locations for relocation of bus stops during Project construction is noted. The Traffic Study in the DEIR Appendix B (page 108) identifies that the potential need to relocate certain bus stops and concludes that as they could all be temporarily relocated within ¼ mile of the original location that there would be no significant impacts on bus stop locations. The Traffic Study was not specific as to the actual places for relocation of the stops, because that will need to be worked out with the transit operators and with LADOT, as part of Mitigation B-1 – the Construction Traffic Control/Management Plan, and based on the specific of the construction program. The Project developer would work with Metro to identify the most feasible and convenient location for any bus stops in the Project area, which require temporary relocation because of Project construction activity.

**RESPONSE NO. 9-11**

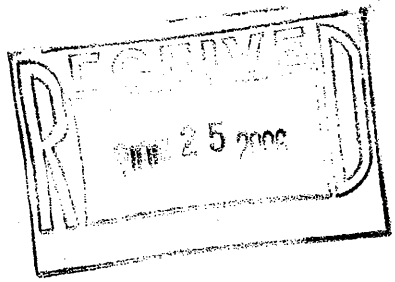
The comment states that Metro looks forward to reviewing the Final EIR and provides a contact person for any questions regarding Metro's letter. The Final EIR will be provided to Metro for their review.

Letter No. 10

JOHN A. CLARKE
EXECUTIVE OFFICER / CLERK

111 NORTH HILL STREET
LOS ANGELES, CA 90012-3014

**Superior Court of California**
**County of Los Angeles**




July 24, 2006

Martha Welborne
The Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Grand Avenue Project. The Los Angeles Superior Court as the main tenant of the Stanley Mosk Courthouse will be impacted by this project. While we are confident that issues relative to the Superior Court will be mitigated in a reasonable manner, there are a number of concerns addressed in our questions that we would like you to consider. We look forward to working with you and the County of Los Angeles to complete a project that enhances the downtown area for all residents, employees and visitors. 10-1

If you have questions or wish to discuss the comments, please feel free to contact John Van Whervin, Director of Facilities Services and Capital Projects, at (213) 974-5305.

Yours truly,

John A. Clarke

John A. Clarke,
Executive Officer

JAC:jvw

Attachment

## Comments on Grand Ave Realignment EIR

| Item | Description | EIR Location | |
|---|---|---|---|
| 1. | A priority objective of the development is to create a 24-hr development. What mitigation exists to deal with the exacerbated homeless issue? | V1, p. 5 | 10-2 |
| 2. | While public parking seems to be covered for the development considerably in this EIR, the issue of employee and juror parking seems to address the existing number of jurors and employees, but no solutions to address growth and additional spaces for employees rather than sending them to Chinatown or other locations to park. | V1, p.7 | 10-3 |
| 3. | Public events during business hours could be disruptive to the operation of the Court. Even weekends could be troublesome. Planning information needs to be shared with the Court in order to allow both court and civic operations to function smoothly. | V1, p.18 | 10-4 |
| 4. | Parking is a serious concern. If the proper amount of parking will only be resolved when the additional development projects in the Civic Center are completed, then this project needs to mitigate the immediate and significant impacts. | V1, p. 22 | 10-5 |
| 5. | If the project will generate in excess of 1500 additional peak hour trips(p. 21), then 3 Share cars hardly seem like a reasonable number. | V1, p. 26 | 10-6 |
| 6. | The development of parcels Q, W1 &W2 will definitely impact the shade/shadows on the courthouse. Later diagrams seem to imply the Courthouse is already fully in shade during the Fall and Winter months. It will now be worse if the developments reach their height limits. This may be a significant but unavoidable impact. | V1, p.29 | 10-7 |
| 7. | Please cite some examples of "high quality materials" | V1, p. 30 | 10-8 |

| | | | |
|---|---|---|---|
| 8. | There is no mention of the impact on the southern views from the courthouse. Many people and photographers view the downtown area from the balcony of the courthouse after lunch at the cafeteria. Significant but unavoidable impact. | V1, p. 30 | 10-9 |
| 9. | While the report describes the removal and replacement of the spiral ramps to Lot 18 from Grand and Hill, I did not see any diagrams or concepts of the replacement ramps. | V1, pp. 36 and 244 | 10-10 |
| 10. | Heavy construction noise during development of parcels Q and W2 will most definitely impact the courthouse. | V1, p. 55 | 10-11 |
| 11. | Did you mean to say that heavy construction will be allowed from 7am to 8am? If as written it is allowed from 7am to 8pm, it will most certainly be disruptive to the courthouse. | V1, p. 58 | 10-12 |
| 12. | LAFD should have discussion with both the County and the Court relative to emergency evacuation plans for both buildings. | V1, p. 66 | 10-13 |
| 13. | General event planning should be shared with the Court, similar to the County's current "Mall Advisory" for events in the Civic Mall. | V1, p. 71 | 10-14 |
| 14. | Lane closures on Grand and Hill for up to 24 months to accommodate ramp reconstruction will impact the courthouse. | V1, p. 89 | 10-15 |
| 15. | Same as 13. Civic Park events without notice could be disruptive. | V1, p.90 | 10-16 |
| 16. | The number of spaces for the County Mall, Lot 10, and the Foltz Building don't seem to add to the 1958 stated on p. 123. | V1, p 135 | 10-17 |
| 17. | Besides the citations in this document, where is a copy of the Los Angeles Civic Center Shared Facilities and Enhancement Plan available? | V1, p. 163 | 10-18 |
| 18. | The Level of Service of the Grand St. signals at Temple and First Street get worse after this development according to Table 12 (p 217) and Table 19 (p. 266). They should be further mitigated. While listed as significant and unavoidable, they should be further researched and mitigated. | V1, p. 217 and V2, p. 853 | 10-19 |

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| 19. | The reconfiguration of the Lot 18 ramps will force southbound traffic on Grand over to Hill and northbound traffic on Hill over to Grand. I do not see how this leaves traffic circulation "unaffected". | V1, p. 245 | 10-20 |
| 20. | If 600+ construction workers will be given access by agreement to parking garages in the area of the project, how will this affect the ability of civic center employees to park who park in these lots now? | V1, p. 257 | 10-21 |

**LETTER NO. 10**

Superior Court of California County of Los Angeles
John A. Clark
Executive Officer/Clerk
111 North Hill Street
Los Angeles, CA 90012-3014

**RESPONSE NO. 10-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Superior Court. The Authority appreciates the willingness of the Superior Court to work with the Authority and the County to complete a project that enhances the downtown area for all residents, employees, and visitors. As discussed in the Draft EIR, feasible mitigation measures would be implemented to address issues of concern to the Superior Court. Also, since the Superior Court is located adjacent to the Project site, it is the intention of the Authority and the County to specifically address any interface issues between Project activities and Superior Court operations.

**RESPONSE NO. 10-2**

The comment expresses the Superior Court's concern regarding any mitigation of the homeless issue. However, no element of the Project would cause or exacerbate homelessness. While homelessness is a community wide social issue, it is not, as such, a CEQA issue. Moreover, development of the Project would result in the creation of a large number of affordable housing units for members of the community (i.e., up to 412 affordable housing units under the Project with County Office Building Option and up to 532 affordable housing units under the Project with Additional Residential Development Option). The increase in affordable housing and the community benefits required of the Project would benefit all residents including the homeless.

**RESPONSE NO. 10-3**

The comment confirms that the Draft EIR (Vol. 1, pages 289-311) comprehensively addresses parking for the proposed Project. The County Administration has at its disposal considerable parking supply and management resources in the Civic Center area, and the Draft EIR determined that the Project would not significantly impact County operations in the Civic Center, including juror, court and other public employee and visitor parking (see pages 301-303

of Volume 1 of the Draft EIR as well as Draft EIR Appendix B pages 144-145). However, any future growth in the number of County employees and jurors is not known at this time, and, therefore, is too speculative to be addressed in this EIR. Such issues will be addressed in conjunction with future determinations on civic center land uses.

**RESPONSE NO. 10-4**

In your comment letter, you raised a number of concerns associated with construction noise and traffic and any attendant impact on the Court's judicial proceedings. Based on recent meetings between representatives of the Authority, the developer and the Superior Court, all parties are committed to a process where the developer and Court representatives meet on an ongoing basis to exchange all necessary information and formulate programs so as to best ensure that the Court's activities will not be significantly disrupted by the construction of the Project. Staff for the Authority will recommend to the Authority's Board that it include an appropriate condition in any resolution approving the Project that would obligate the developer to lead such a coordination and communication process. Additionally, you raised a comment concerning the possible disruption on court operations due to large events planned for the new Civic Park. As has been the case with prior events at the Civic Mall, the County or its park operator would continue to work with the Superior Court in advance of such events to ensure that any disruption to the court's proceedings due to noise or traffic are minimized if not eliminated.

**RESPONSE NO. 10-5**

The comment raises again the concerns of parking supply. The Draft EIR identifies that the Project causes no significant parking impacts and directly addresses its operational parking needs and replacement supply for any existing publicly owned parking to be removed (pages 289-311 of Volume 1 of the Draft EIR). The parking needs for the Project would only occur when the Project is built. At that time the Draft EIR demonstrates that sufficient parking would be provided (pages 289-311 of Volume 1 of the Draft EIR). The Draft EIR explains (pages 292 to 294 of Volume 1 of the Draft EIR) that the Project would provide more residential parking spaces than are required by the City Code, and would provide sufficient parking to meet the residential parking demand based on residential parking supply ratios that are consistent with recent market experience of other approved projects that are built, under construction or planned in the downtown. Thus, the DEIR concluded (page 294 of Volume 1 of the Draft EIR) that the residential parking supply will be sufficient and there will be no significant parking demand impacts from the residential uses. In addition the DEIR further details (pages 294 to 300 of Volume 1 of the Draft EIR) a comprehensive analysis that was conducted of commercial parking demand for the Project. This analysis concluded that the Project will provide sufficient parking

on-site, in conjunction with additional parking supply to be provided in nearby off-site locations by the County (from existing unutilized parking supply locations), and in conjunction with nearby existing commercial parking in the evenings and weekends (that is unutilized at those times) to meet all of the Project's parking demands. The DEIR (page 300 of Volume 1 of the Draft EIR) therefore concludes there will be no significant off-street parking impacts due to the Project.

Further, the Draft EIR also addresses strategies and locations for the replacement of existing publicly owned parking to be removed, and explains why there would be no significant impacts from the removal of said parking. Such replacement parking would be implemented prior to the start of construction (pages 301-302 of Volume 1 of the Draft EIR). See also Response No. 10-3.

**RESPONSE NO. 10-6**

The comment expresses a concern about peak trips and the suggested Share Car mitigation measure. Because of the nature and location of the proposed Project, a mixed use project located in downtown Los Angeles near many employment and other destinations with very high levels of transit service, a notable number of trips would be made by transit and walking. Share Cars are only one element of the multifaceted transportation mitigation program described in the Draft EIR (pages 317-320 of Volume 1 of the Draft EIR), that also includes a Transportation Demand Management Program for the office building (Mitigation Measure B-4), under the Project with County Office Building Option, improvements to the traffic signal system in the area of the Project (Mitigation Measure B-5), and various measures to encourage walking and use of transit as well as vehicular directional signage programs (Mitigation Measure B-6).

**RESPONSE NO. 10-7**

The comment expresses the concern that the development of Parcels Q, W-1, and W-2 would create shade/shadow impacts on the County Courthouse. As indicated in the Draft EIR, shading of the courthouse would increase with the development of these parcels. However, the threshold of significance, which is based on the City of Los Angeles' CEQA Thresholds Guide, defines locations that would be sensitive to potential shade/shadow impacts as routinely useable outdoor spaces associated with recreational or residential uses, schools, and commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas in which sunshine is important to function, physical comfort, or commerce (Draft EIR, Vol. 1, Section IV.C, page 400). Based on this definition, the County Courthouse does not qualify as a sensitive location with regard to shade/shadow. Therefore, the increased shading of the Courthouse that

would occur as a result of the Project is appropriately concluded in the Draft EIR, as a less than significant impact.

**RESPONSE NO. 10-8**

The term "high quality materials" is a planning term that refers to materials that meet or exceed code standards for durability and other qualities. High quality materials are understood to be materials that are less subject to corrosion, that have structural integrity, and that would be visually pleasing. These may include a high grade of concrete, metals, stone, and other facing or cladding materials. The use of specific "high quality materials" would be determined during the architectural or design review of each of the Project's components, in which the participating architects would be required to demonstrate the use of high quality materials.

**RESPONSE NO. 10-9**

The comment raises the issue of the impact of a changed southern view from the balcony of the Courthouse. As discussed in the Draft EIR, the Los Angeles County Hall of Justice has a south-facing view across Parcel Q (page 390 of Volume 1 of the Draft EIR). The significance threshold set forth in the Draft EIR, as it applies to the Superior Court, states that a significant impact would occur if the Project would substantially obstruct views of a visually prominent resource as viewed from a public vantage point (see page 362 of Volume 1 of the Draft EIR). The Draft EIR then goes on to identify public vantage points as designated scenic highways, corridors, parkways, roadways, bike paths and trails. The southern view from the balcony of the Superior Court building does not meet the criteria set forth in the Draft EIR for consideration relative to the established significance threshold, which is based on the City of Los Angeles CEQA Thresholds Guide. However, an understanding of the view impacts of the Project from this location may be extrapolated from the discussion presented in the Draft EIR. According to the Draft EIR (page 348 of Volume 1 of the Draft EIR), south-facing views across Parcel Q include prominent high-rise structures and a portion of the downtown skyline including the California Plaza towers, Wells Fargo Tower, the Bank of America Plaza (333 Hope Street) tower, and the north façade of the Colburn School of Performing Arts. Views of the Walt Disney Concert Hall are also available from this location.

According to the Draft EIR (pages 389-390 of Volume 1 of the Draft EIR), this view would be blocked by the proposed development of Parcel Q. The impact on views from the street and pedestrian vantage point would be considered greater than views from the Superior Court, since the Superior Court is designed with few available views toward the south.

However, the balcony would not be considered a vantage point according to the view impact threshold set forth in the Draft EIR (page 362 of Volume 1 of the Draft EIR).

Although Parcel Q, under the Conceptual Plan, contains a variety of high- and mid-rise structures, due to the proximity of the view vantage point on First Street and, similarly from the Courthouse, views toward existing buildings south of Parcel Q would be blocked. However, views of the Walt Disney Concert Hall would not be blocked from the subject vantage point. Further, with respect to views of the California Plaza and the Wells Fargo towers, the view of such tall buildings is typical of views within Los Angeles's high-rise core and similar views would continue to be available from the Grand Avenue corridor and other street and sidewalk areas in the city. The exchange of existing views of high-quality urban development with future views of high-quality urban development is an important factor in assessing the magnitude of view blockage. Therefore, the impact of development with regard to south-facing views of the California Plaza and Wells Fargo towers are concluded to be less than significant (page 390 of Volume 1 of the Draft EIR). Furthermore, even if the Superior Court balcony were considered a public vantage point, per the definition set forth in the applicable significance threshold, Project impacts at this location would be less than significant based on the analysis presented above.

**RESPONSE NO. 10-10**

The comment expresses an interest in diagrams of the replacement ramps to Lot 18 from Grand Avenue and Hill Street. Specific building plans are not available at this time; however, in coordinating construction activities with the Superior Court,, the Developer would be able to answer specific questions about the ramps. See also Response No. 10-4. Conceptual features described in the Draft EIR, which include the reconfiguration of the upper sections of the existing helical ramps at both Grand Avenue and Hill Street to enable the creation of new pedestrian plazas; connecting the new street entrance ramps to the existing helical ramps, one level down; and the preservation of most of the helical ramp system below the street level are design features that are anticipated to be implemented in any approved development plans. The changes to the ramps to Lot 18 would require that this parking lot ingress and egress would be all "right-in" and "right-out" on Grand Avenue as well as on Hill Street. This operational change with respect to Grand Avenue ingress and egress is described in the Draft EIR.

**RESPONSE NO. 10-11**

This comment raises the concern about construction noise on Parcels Q and W2 and its impacts on the Courthouse. It is the intention of the Authority to require the Developer to coordinate construction activities with the Superior Court in order to reduce construction noise

impacts to the greatest extent feasible. Noise impacts on the County Courthouse have been addressed in the Draft EIR. According to the Draft EIR, (page 577 of Volume 2 of the Draft EIR), although courthouses are not specifically defined as noise sensitive land uses in the City's CEQA Thresholds Guide, the County Courthouse was included as a sensitive land use given the close proximity of this use to the proposed Civic Park, and the need for a quieter environment in courtrooms during judicial proceedings. Noise-sensitive land uses (sensitive receptor locations) in the Project vicinity are shown in Figure 46 on page 578 of Volume 2 of the Draft EIR. The Draft EIR evaluates and summarizes the impact of construction noise on sensitive receptor sites, including the County Courthouse in Table 69 on page 590 of Volume 2 of the Draft EIR). Mitigation Measures G-1 and G-2 (page 603 of Volume 2 of the Draft EIR) would be implemented to attenuate construction noise impacts at the Courthouse site. In addition, mitigation measures Mitigation Measures G-3 through G-5 (pages 603-604 of Volume 2 of the Draft EIR) would also provide noise reduction. Mitigation Measure G-6 (page 604 of Volume 2 of the Draft EIR) would provide for a liaison officer who would respond to any complaints regarding construction noise. Furthermore, it is the intention of the Authority to require that the Developer coordinate construction activities with the Superior Court on an ongoing basis during Project construction in order to reduce construction noise impacts to the greatest extent feasible. With the implementation of the identified mitigation measures and the coordination of construction phases with activities at the Superior Court, it is anticipated that the impact of Project construction noise on Superior Court activities would be reduced to the greatest extent feasible. Please refer to Response No. 10-4 regarding the establishment of the means by which coordination between the Developer and the Superior Court would occur during Project construction.

**RESPONSE NO. 10-12**

This comment raises a concern about the hours of construction. The Los Angeles Municipal Code (LAMC) allows building construction to occur until 9:00 P.M. on weekdays. Mitigation Measure G-1 states that the Project Developer, with regard to the five development parcels and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall limit construction activities utilizing heavy equipment to Monday through Friday from 7:00 A.M. to 8:00 P.M. Furthermore, the Project developer has agreed to a condition of Project approval that would establish the 7:00 A.M. to 3:30 P.M. shift as the standard shift for the majority of construction workers for the Project. For these reasons, among others, allowing Project construction to 8:00 P.M., as analyzed in the Draft EIR, is maintained, as it is likely that a second shift, or overtime shift would be required to meet the schedule, but with a smaller work crew than the normal shift.

With regard to the Draft EIR, it is concluded that construction noise levels would be significant at the Courthouse site (pages 589 – 590 of Volume 2 of the Draft EIR). As previously described (see Response No. 9-11), noise mitigation measures specifically addressing noise in the vicinity of the Courthouse shall be implemented. In addition, the Authority and the County would coordinate all construction activities with the Superior Court to assure that construction noise issues would be addressed to the extent feasible. The cited construction hours are consistent with hours allowed by City Code, and would be needed to maintain the Project's construction phasing and schedule. Please refer to Response No. 10-4 regarding the establishment of the means by which coordination between the Developer and the Superior Court would occur during Project construction.

**RESPONSE NO. 10-13**

This comment requests coordination with LAFD on County and Court emergency evacuation procedures. It is the intention of the Authority to require the Developer to meet with the Superior Court to coordinate construction issues, including emergency access. In addition, emergency access during construction, with respect to the County Courthouse has been addressed in the Draft EIR. Compliance with Regulatory Measures I.1-1 through I.1-7 (pages 630-632 of Volume 2 of the Draft EIR) would assure that emergency access in the area would be maintained. Specifically, Regulatory Measure I.1-4 would require that, prior to each construction phase, the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements, prepare and implement a plan to ensure that emergency evacuation from the northwest side of the County Mall would not be impeded by construction of the individual Project elements. With respect to the plan for the Civic Park, it must be prepared to coordinate with emergency evacuation plans for the Courthouse and the Hall of Administration. The LAFD shall determine compliance with this measure with regard to the five development parcels and the Streetscape Program. The LACoFD shall determine compliance with this measure with regard to the Civic Park.

**RESPONSE NO. 10-14**

This comment requests that general event planning should be shared with the Court as currently occurs in the County's "Mall Advisory" for events in the current civic mall. We anticipate that this coordination would continue. As previously discussed in Response No. 10-4, during operation of the Civic Park, the County or its contract operator would proactively coordinate all activities and public events in Civic Park with the Superior Court.

**RESPONSE NO. 10-15**

This comment raises concerns about lane closures during construction. Impacts of construction on traffic are analyzed in Volume 1 of the Draft EIR on pages 253-256. This analysis concludes that lane closures during Project construction, although temporary in nature, could cause significant traffic impacts during periods of closure. The Draft EIR, on pages 317-318, also identifies mitigation measures to minimize impacts on traffic during Project construction, including the development of a Construction Traffic Control/Management Plan (to be approved by LADOT), which among other things would also address the adjacent land uses to the Project including the Superior Court.

**RESPONSE NO. 10-16**

This comment refers back to Comment 10-14 about Civic Mall events. As previously discussed in Response No. 10-4, and Response No. 10-14, during operation of the Civic Park, the County would proactively coordinate all activities and public events in Civic Park with the Superior Court.

**RESPONSE NO. 10-17**

The comment raises a question about the accuracy of a figure on parking spaces. The parking space numbers referenced in this comment are, in fact, consistent. For the lots referred to, the numbers in Figure 10 on page 135 of Volume 1 of the Draft EIR, total 2,283 spaces and include 1,288 spaces for Lot 18, 646 spaces for Lot 10 and 349 spaces for Lot 11. The 646 spaces in the Lot 10 garage represent total spaces, although as described earlier in the Draft EIR (page 107 in Volume 1 of the Draft EIR), 325 spaces are currently not in use as a result of conditions attributable to the 1994 Northridge earthquake. The text on page 123 of Volume 1 of the Draft EIR refers to operational spaces (i.e. currently actually in use), which are 1,288 in Lot 18, 321 in Lot 10, and 349 in Lot 11 for a total of 1,958 spaces.

**RESPONSE NO. 10-18**

The comment requests information on finding a cited document. A copy of the Los Angeles Shared Facilities and Enhancement Plan has been available from the Los Angeles Grand Avenue Authority, which is the Project's Lead Agency. The address for the Authority is C/O Grand Avenue Committee, California Community Foundation, 445 South Figueroa Street, Suite 3400, Los Angeles, California, 90071, as cited on the Draft EIR title page.

**RESPONSE NO. 10-19**

The comment refers to traffic impacts for the Project with County Office Building Option. For this Project Option the impacts at the cited intersections are either fully or partially mitigated. Remaining significant impacts occur only in the P.M. peak, and the resultant level of service would be LOS D (Draft EIR, pages 323-324). Specifically, the impact at Grand Avenue/Temple Street is in the P.M. peak hour only, and is partially mitigated to LOS D; the impact at Grand Avenue/First Street in the A.M. peak hour is mitigated; the impact at Grand Avenue/First Street in the P.M. peak hour is partially mitigated from LOS E to LOS D. Furthermore, the principal traffic mitigation requiring ATCS signal system improvements would improve traffic flow at all intersections in the area of the Project. As discussed in the Draft EIR (pages 158-164 of Appendix B of the Draft EIR), street improvement mitigations were evaluated at impacted intersections but found infeasible because intersections cannot be widened due to right-of-way constraints, and many downtown intersections have already been striped for the maximum number of possible lanes. The Draft EIR also discusses the mitigation strategy for the Project (pages 158-159 of Appendix B of the Draft EIR) including that for downtown to function effectively from an access and circulation standpoint it is important for the transportation system to achieve a multi-modal balance in serving vehicular traffic, transit and pedestrians, rather than merely focus on street widening, which can negatively impact pedestrian circulation.

Based on further discussions with the City of Los Angeles' Department of Transportation (LADOT), it has been determined that a physical roadway improvement is feasible at the intersection of Hill Street and Third Street. This intersection is located at the east entrance to the Third Street Tunnel under Bunker Hill, a two-lane one-way westbound tunnel. The proposed improvement would be a restriping of the westbound approach on Third Street, within the existing roadway width, from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. The implementation of this measure would also require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. With this measure (in combination with the other mitigation measures), the P.M. peak volume/capacity ratio at the Hill Street and Third Street intersection for the Project with County Office Building Option would be reduced from 1.103 (LOS F) to 1.007 (LOS F). This improvement in roadway operating conditions would fully mitigate the Project's impact at this particular intersection. The impacts at this intersection for the A.M. peak hour and for both peak hours under the Project with Additional Residential Development Option are less than significant without this measure.

With the implementation of this additional mitigation measure, the number of significant unavoidable impacts in the P.M. peak hour for the Project with County Office Building Option would be reduced from the 13 locations identified in the Draft EIR to 12 locations. Therefore, and on an overall basis, there would still be one significant unavoidable impact in the A.M. peak hour and 12 significant unavoidable impacts in the P.M. peak hour

**RESPONSE NO. 10-20**

The comment raises a concern about the use of the term "unaffected" in part of the traffic analysis. The term, "Unaffected," (page 245 of Volume 1 of the Draft EIR) refers to the traffic movements at the Hill Street ramps. Because the ramp improvements would not change any of the current turn movements (currently right-turns only are allowed because of the existing median on Hill Street) then circulation patterns would not be changed – i.e. they would be unaffected.

The reconfiguration of the Grand Avenue ramps would divert some traffic to Hill Street (as identified on page 245 of Volume 1 of the Draft EIR). The reconfiguration of the Hill Street ramps would not divert traffic from Hill Street to Grand Avenue, as currently left turns at the Hill Street ramps are not allowed and this would not change (as discussed in the preceding paragraph). Diverted traffic from Grand Avenue to Hill Street is included in the operational traffic analysis (discussed on pages 265-275 of Volume 1 of the Draft EIR). Construction traffic impacts of the Lot 18 ramp improvements are addressed on page 256 of Volume 1 of the Draft EIR.

**RESPONSE NO. 10-21**

The comment raises the issue of the impact of parking for construction workers. As identified in the Draft EIR, "The developer proposes to enter into some form of temporary arrangement with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off-street spaces for the construction workers during Project construction, and to require all construction workers to use these designated parking spaces. With the implementation of this program, there would be no significant parking impacts due to construction worker parking" (Vol. 1, page 257).

It is the intent of the Project Developer that parking agreements for construction worker parking would only be made with garages/lots that have currently vacant spaces. It is not the intent of the Project to force out existing parkers in the Civic Center area. This program would be implemented by the Authority and would incorporate specific actions and/or measures to the

extent necessary for a successful program. Some of these locations may be remote or outlying if necessary, and would be connected to the construction site with shuttle buses. In response to this issue a new mitigation measure has been added to the Final EIR, which requires that a shuttle service be provided if the remote parking sites for construction workers are beyond a walking distance of 1,100 feet from Project site. The new mitigation measure shall read:

**Mitigation Measure F-11:** During each construction phase, the Project Developer, with regard to the five development parcels, and the responsible parties for implementation of the Civic Park and Streetscape Program under the applicable agreements shall ensure that shuttle service shall be provided to construction workers who are required to park in offsite parking lots, if such lots are not within a walking distance of 1,100 feet from the respective construction sites. The CRA/LA shall determine compliance with this measure with regard to construction associated with the five development parcels and the Streetscape Program. The County's CAO or designee shall determine compliance with this measure with regard to the Civic Park.

This new mitigation measure (Mitigation Measure F-11) is presented in Section II, Corrections and Additions of this Final EIR.

# Los Angeles Unified School District

## Facilities Services Division

Letter No. 11

**ROY ROMER**
*Superintendent of Schools*

**JOSEPH A. MEHULA**
*Chief Executive, Facilities Services Division*

**JIM COWELL**
*Deputy Chief Executive, New Construction Branch*

**RENA S. PEREZ**
*Director, Master Planning and Demographics*

July 25, 2006

TO: Martha Welborne
Los Angeles Grand Avenue Authority c/o California Community Foundation
445 South Figueroa St. Suite 3400
Los Angeles, CA 90071

FROM: Rena Perez, Director
Master Planning & Demographics

SUBJECT: *Response to: Draft Environmental Impact Report for The Grand Avenue Project*

This is a response to information included within the Draft Environmental Impact Report (DEIR), as presented in the Los Angeles Grand Avenue Authority, State Clearinghouse No 2005091041 document, issued June 2006. 11-1

Select information regarding enrollments and capacities as published in the DEIR are not consistent with information officially available and provided by the LAUSD. Please see below for corrections.

1) Page 654 paragraph 1 & 2
Citing the 2004-2005 Fingertip Facts, the DEIR states " The LAUSD is currently....operates 819 K-12 schools and centers including 419 elementary schools, 74 middle schools, and 50 senior high schools..." 11-2

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- As stated in the 2004 -2005 Fingertip Facts fact sheet, the LAUSD operates 434 elementary schools, 78 middle schools, 56 senior high schools.
- As stated in the 2005 -2006 Fingertip Facts fact sheet, the LAUSD operates 431 elementary schools , 73 middle schools, and 53 senior high schools.

2) Page 654 paragraph 3;
The DEIR states "Eligible enrollment may be less than actual enrollment as the following options could allow students to enroll in schools away from their home attendance area."

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-As stated in the cover letter sent along with every request for information, the data provided in all LAUSD Enrollment and Capacity Reports *already take into account* portable classrooms on site, additions being built onto existing schools, **student permits and transfers**, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools.
-**"Eligible"/"Resident" enrollments may be less than Actual Enrollments mainly due to the implementation of multi-track calendars.** Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities. A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK). 11-3
-**Projected Capacity**, as reported in the Enrollments and Capacities Report, identifies the capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.


KPMG Building: 355 S. Grand Ave., Suite 1020, Los Angeles, CA 90071 • Mailing Address: P.O. Box 513307-1307, Los Angeles, CA 90051-1307 •Telephone (213)633-7606 •Fax (213)633-7667

3) Page 655, paragraph 1
The DEIR states "According to the LAUSD, a school is considered to be overcrowded if any of the following conditions exist: …"

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-*Current* shortage/ overage of seats is defined **separately** from *future* shortages/ overages, as specified in all LAUSD Enrollments and Capacities Reports.
-A school is considered to be **currently** overcrowded if any of the following conditions is met:

a) School is **currently** on a multi-track calendar
b) There is **currently** a seating shortage
c) There is **currently** a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

11-4

-For **future** planning purposes a school will be considered to be overcrowded if any of the following conditions is met:

a) School remains on a multi-track calendar
b) There is a seating shortage in the future
c) There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

4) Page 656, paragraph 1
The project development area is served by three elementary schools.
Please refer to the three attached LAUSD Enrollments and Capacities Reports for identification and details of schools serving the Grand Avenue Project development area.
- Schools include:

a) 9th Street Elementary
b) Castelar Elementary
c) Gratts Elementary
d) Virgil Middle
e) Belmont Senior High

11-5

5) Page 656, paragraph 2
The DEIR states " However, if the actual number of students enrolled at these schools were compared to the current capacity, both schools would be operating with available capacity."

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-The DEIR **incorrectly concludes** that Virgil Middle School and Belmont Senior High School "…would operate with available capacity" if the difference between Actual Enrollments and Current Capacities were calculated.
-Differences between Actual Enrollments and Current Capacities **cannot** be compared directly.
As stated in the LAUSD Enrollments and Capacities Report, the difference between *Resident* Enrollment and Current Capacity should be used to indicate shortage or overage of seats.
-In the cases of Virgil Middle and Belmont Senior High schools, Actual Enrollment totals reflect that LAUSD is currently enrolling students in other schools as a remedial measure for overcrowded conditions at the neighborhood school.

11-6

Additional information can be found in LAUSD's 2006 "Strategic Execution Plan" at www.laschools.org/sep/, on LAUSD's Facilities main webpage at www.laschools.org/, or on LAUSD's general website, at www.lausd.net.

11-7

ATTACHMENTS

1. UPDATED LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES REPORTS

Sincerely,

Rena Perez, Director


KPMG Building: 355 S. Grand Ave., Suite 1020, Los Angeles, CA 90071 • Mailing Address: P.O. Box 513307-1307, Los Angeles, CA 90051-1307 •Telephone (213)633-7606 •Fax (213)633-7667

## LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES

## PROJECT SERVED: THE GRAND AVENUE PROJECT - PARCEL Q, CITY OF LOS ANGELES

## SCHOOL YEAR: 2006-2007

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Location Code | School Name | Current Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current seating overage/(shortage) | Overcrowded Now? | Projected Capacity | Projected Enrollment | Projected seating overage/(shortage) | Overcrowding Projected in Future? |
| 2863 | CASTELAR EL | 1 TRK | 907 | 812 | 793 | 95 | No | 687 | 819 | (132) | Yes |
| 2385 | GRATTS EL | 3 TRK | 1051 | 966 | 921 | 85 | Yes | 627 | 812 | (185) | Yes |
| 8462 | VIRGIL MS | 3 TRK | 2819 | 4661 | 2806 | (1842) | Yes | 1950 | 4207 | (2257) | Yes |
| 8543 | BELMONT SH | 3 TRK | 4915 | 7083 | 4941 | (2168) | Yes | 2839 | 7953 | (5114) | Yes |

**Schools Planned to Relieve Known Overcrowding**

| | | | 13 |
|---|---|---|---|
| | Gratts New PC | 1-TRK | 400 |
| | Central LA New MS # 1 | 1-TRK | 1701 |
| | Central LA New MS # 3 | 1-TRK | 810 |
| | Central LA New Learning Center # 1 | 1-TRK | 3439 |
| | Central Region Belmont SPAN Reconfiguration | 1-TRK | 1971 |
| | Central LA HS # 9 | 1-TRK | 1728 |
| | Central LA HS #10 | 1-TRK | 1944 |
| | Central LA HS #11 | 1-TRK | 2835 |
| | Central LA HS #12 | 1-TRK | 513 |

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED. DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

NOTES:

[1] School's ID code

[2] School's name

[3] The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.

[4] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.

[5] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
- -Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
- -A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).

[6] The number of students actually attending the school now, including secondary-grades magnet students.

[7] Current seating overage or (shortage); equal to (current capacity) - (resident enrollment).

[8] Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
- -School is currently on a multi-track calendar
- -There is currently a seating shortage
- -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

[9] The capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

[10] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

[11] Projected seating overage or (shortage); equal to (projected capacity) - (projected enrollment).

[12] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
- -School remains on a multi-track calendar.
- -There is a seating shortage in the future.
- -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

[13] The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

11-8

## LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES

## PROJECT SERVED: THE GRAND AVENUE PROJECT - PARCELS L/M-2, CITY OF LOS ANGELES

## SCHOOL YEAR: 2006-2007

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Location Code | School Name | Current Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current seating overage/(shortage) | Overcrowded Now? | Projected Capacity | Projected Enrollment | Projected seating overage/(shortage) | Overcrowding Projected in Future? |
| 2863 | CASTELAR EL | 1 TRK | 907 | 812 | 793 | 95 | No | 687 | 819 | (132) | Yes |
| 2385 | GRATTS EL | 3 TRK | 1051 | 966 | 921 | 85 | Yes | 627 | 812 | (185) | Yes |
| 8462 | VIRGIL MS | 3 TRK | 2819 | 4661 | 2806 | (1842) | Yes | 1950 | 4207 | (2257) | Yes |
| 8543 | BELMONT SH | 3 TRK | 4915 | 7083 | 4941 | (2168) | Yes | 2839 | 7953 | (5114) | Yes |

**Schools Planned to Relieve Known Overcrowding**

| | | | 13 |
|---|---|---|---|
| | Gratts New PC | 1-TRK | 400 |
| | Central LA New MS # 1 | 1-TRK | 1701 |
| | Central LA New MS # 3 | 1-TRK | 810 |
| | Central LA New Learning Center # 1 | 1-TRK | 3439 |
| | Central Region Belmont SPAN Reconfiguration | 1-TRK | 1971 |
| | Central LA HS # 9 | 1-TRK | 1728 |
| | Central LA HS #10 | 1-TRK | 1944 |
| | Central LA HS #11 | 1-TRK | 2835 |
| | Central LA HS #12 | 1-TRK | 513 |

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED. DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

NOTES:

[1] School's ID code

[2] School's name

[3] The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.

[4] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.

[5] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
- -Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
- -A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).

[6] The number of students actually attending the school now, including secondary-grades magnet students.

[7] Current seating overage or (shortage); equal to (current capacity) - (resident enrollment).

[8] Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
- -School is currently on a multi-track calendar
- -There is currently a seating shortage
- -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

[9] The capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

[10] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

[11] Projected seating overage or (shortage); equal to (projected capacity) - (projected enrollment).

[12] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
- -School remains on a multi-track calendar.
- -There is a seating shortage in the future.
- -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

[13] The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

## LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES

## PROJECT SERVED: THE GRAND AVENUE PROJECT - PARCELS W-1/W-2, CITY OF LOS ANGELES

## SCHOOL YEAR: 2006-2007

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Location Code | School Name | Current Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current seating overage/(shortage) | Overcrowded Now? | Projected Capacity | Projected Enrollment | Projected seating overage/(shortage) | Overcrowding Projected in Future? |
| 5505 | 9TH ST EL | 1 TRK | 531 | 264 | 464 | 267 | No | 438 | 327 | 111 | No |
| 8462 | VIRGIL MS | 3 TRK | 2819 | 4661 | 2806 | (1842) | Yes | 1950 | 4207 | (2257) | Yes |
| 8543 | BELMONT SH | 3 TRK | 4915 | 7083 | 4941 | (2168) | Yes | 2839 | 7953 | (5114) | Yes |

**Schools Planned to Relieve Known Overcrowding**

| | | | 13 |
|---|---|---|---|
| | Central LA New MS # 1 | 1-TRK | 1701 |
| | Central LA New MS # 3 | 1-TRK | 810 |
| | Central LA New Learning Center # 1 | 1-TRK | 3439 |
| | Central Region Belmont SPAN Reconfiguration | 1-TRK | 1971 |
| | Central LA HS # 9 | 1-TRK | 1728 |
| | Central LA HS #10 | 1-TRK | 1944 |
| | Central LA HS #11 | 1-TRK | 2835 |
| | Central LA HS #12 | 1-TRK | 513 |

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED. DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

11-8

NOTES:

[1] School's ID code

[2] School's name

[3] The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.

[4] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.

[5] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

-Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.

-A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).

[6] The number of students actually attending the school now, including secondary-grades magnet students.

[7] Current seating overage or (shortage); equal to (current capacity) - (resident enrollment).

[8] Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:

-School is currently on a multi-track calendar

-There is currently a seating shortage

-There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

[9] The capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

[10] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

[11] Projected seating overage or (shortage); equal to (projected capacity) - (projected enrollment).

[12] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:

-School remains on a multi-track calendar.

-There is a seating shortage in the future.

-There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

[13] The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Business Services Division

LOC. CODE: 5505

SUBJECT: UPDATE BOUNDARY DESCRIPTION FOR NINTH STREET SCHOOL EFFECTIVE JULY 1, 1984 (UPDATED 7-1-94).

Reconfiguration has changed the grade levels serviced by this school and the boundary description has been updated to reflect this change. This updating does not change the intent of the boundary as it was approved on July 1, 1984. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

11-8

This is an official copy for your file.

(GRADES K - 5)

FIRST STREET * ALAMEDA STREET * FOURTH STREET * LOS ANGELES RIVER * FIFTEENTH STREET AND EXTENSION * CENTRAL AVENUE * FOURTEENTH PLACE * SAN PEDRO STREET * FOURTEENTH STREET AND EXTENSION * MAIN STREET * FOURTEENTH STREET * HILL STREET * VENICE BOULEVARD * HOPE STREET AND EXTENSION * FOURTH STREET * OLIVE STREET.

For assistance, please call Demographic and Boundary Unit, Facilities Asset Management Division, at (213) 742-7596.

APPROVED: C. DOUGLAS BROWN, Interim Coordinator, Facilities Asset Management Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
**Information Technology Division**

**LOC. CODE: 2385**

**SUBJECT:** CLARIFICATION OF THE BOUNDARY DESCRIPTION FOR EVELYN T. GRATTS SCHOOL EFFECTIVE JULY 1, 1996 (CLARIFIED 7-5-96).

This clarification of the existing boundary description does not change the intent of the boundary as it was approved on July 1, 1996. (Changes have been highlighted by "strikeout" and/or boldface type.) The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

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11-8

(GRADES K - 5)

BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY * WILSHIRE BOULEVARD * WITMER STREET (BOTH SIDES) * SIXTH STREET * LOMA DRIVE (BOTH SIDES) * THIRD STREET (BOTH SIDES) * UNION PLACE (BOTH SIDES EXCLUDED) * CROWN HILL AVENUE (BOTH SIDES) * ~~SECOND STREET (BOTH SIDES)~~ * LOMA DRIVE (BOTH SIDES).

OPTIONAL: GRATTS AND CASTELAR SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5464.

**APPROVED:** JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

**DISTRIBUTION:** School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
**Information Technology Division**

**LOC. CODE:2863**

**SUBJECT:** **NEW SERVICE BOUNDARY DESCRIPTION FOR CASTELAR SCHOOL EFFECTIVE JULY 1, 1996.**

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 1984 (updated July 1, 1995).

This is an official copy for your file.

(GRADES K - 5)

11-8

INNES AVENUE (BOTH SIDES EXCLUDED) * LILAC PLACE (BOTH SIDES EXCLUDED) * ELYSIAN PARK AVENUE (BOTH SIDES EXCLUDED) * STADIUM WAY * LILAC TERRACE (BOTH SIDES) * LOOKOUT DRIVE (BOTH SIDES) * STADIUM WAY (BOTH SIDES) * PASADENA FREEWAY * BERNARD STREET AND EXTENSIONS * NORTH SPRING STREET * ALAMEDA STREET * FIRST STREET * FREMONT AVENUE (BOTH SIDES EXCLUDED) * TEMPLE STREET * BEAUDRY AVENUE (BOTH SIDES) * SUNSET BOULEVARD * EVERETT STREET (BOTH SIDES EXCLUDED) * EVERETT PLACE AND EXTENSION (BOTH SIDES EXCLUDED).

OPTIONAL: CASTELAR AND GRATTS SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

**APPROVED:** JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

**DISTRIBUTION:** School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L.A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
**Facilities Services Division**

**LOC. CODE:** 8462

**SUBJECT:** NEW SERVICE BOUNDARY DESCRIPTION FOR VIRGIL MIDDLE SCHOOL EFFECTIVE JULY 1, 2001

The area described below has been approved by the superintendent as the attendance area served by the above mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1 1996 (updated 7-1-97).

This is an official copy for your file.

11-8

(GRADES 6-8)

MELROSE AVENUE * NORMANDIE AVENUE * MONROE STREET AND EXTENSION (INCLUDING 826 MARIPOSA AVENUE AND 773 ALEXANDRIA AVENUE) * ALEXANDRIA AVENUE * MONROE STREET * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * SILVER LAKE BOULEVARD * BELLEVUE AVENUE * MICHELTORENA STREET * MARATHON STREET * RAMPART BOULEVARD * SUNSET BOULEVARD * ALVARADO STREET * MONTROSE STREET * GLENDALE BOULEVARD * TEMPLE STREET * BELMONT AVENUE * BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY * THIRD STREET * LUCAS AVENUE * SIXTH STREET * LAFAYETTE PARK PLACE * WILSHIRE BOULEVARD * WESTERN AVENUE.

For assistance, please call Master Planning and Demographics Branch, Facilities Services Division, at (213) 633-7606.

**APPROVED:** JAMES A McCONNELL, Chief Facilities Executive, Facilities Services Division

**DISTRIBUTION:**
School
Pupil Statistics
Transportation Branch
Master Planning and Demographics
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

# LOS ANGELES UNIFIED SCHOOL DISTRICT
Facilities Services Division

**LOC. CODE:** 8543

**SUBJECT:** NEW SERVICE BOUNDARY DESCRIPTION FOR BELMONT SENIOR HIGH SCHOOL EFFECTIVE JULY 1, 2005.

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 2004.

This is an official copy for your file.

(GRADES 9 – 11)

MELROSE AVENUE * NORMANDIE AVENUE * HOLLYWOOD FREEWAY * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * ALVARADO STREET AND EXTENSION * WHITMORE AVENUE AND EXTENSION * LANDA STREET (BOTH SIDES, INCLUDING ALL OF TWIN OAK STREET) * LANDA STREET EXTENDED FROM THE INTERSECTION OF LANDA STREET AND STADIUM WAY * GOLDEN STATE FREEWAY * WEST BOUNDARY OF ELYSIAN PARK * ACADEMY ROAD AND EXTENSION EASTERLY AND SOUTHERLY TO THE INTERSECTION OF STADIUM WAY AND PASADENA FREEWAY * STADIUM WAY AND EXTENSION * NORTH SPRING STREET * ALAMEDA STREET * SANTA ANA FREEWAY * LOS ANGELES RIVER * WHITTIER BOULEVARD * SIXTH STREET * MAIN STREET * PICO BOULEVARD * HARBOR FREEWAY * VENICE BOULEVARD * UNION AVENUE * 14TH STREET * BURLINGTON AVENUE * PICO BOULEVARD * MAGNOLIA AVENUE * 12TH STREET * WESTMORELAND AVENUE * ELEVENTH STREET * VERMONT AVENUE * WILSHIRE BOULEVARD * KINGSLEY DRIVE * BEVERLY BOULEVARD * KINGSLEY DRIVE. 11-8

(GRADE 12)

MELROSE AVENUE * NORMANDIE AVENUE * HOLLYWOOD FREEWAY * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * ALVARADO STREET AND EXTENSION * WHITMORE AVENUE AND EXTENSION * LANDA STREET (BOTH SIDES, INCLUDING ALL OF TWIN OAK STREET) * LANDA STREET EXTENDED FROM THE INTERSECTION OF LANDA STREET AND STADIUM WAY * GOLDEN STATE FREEWAY * WEST BOUNDARY OF ELYSIAN PARK * ACADEMY ROAD AND EXTENSION EASTERLY AND SOUTHERLY TO THE INTERSECTION OF STADIUM WAY AND PASADENA FREEWAY * STADIUM WAY AND EXTENSION * NORTH SPRING STREET * ALAMEDA STREET * SANTA ANA FREEWAY * LOS ANGELES RIVER * WHITTIER BOULEVARD * SIXTH STREET * MAIN STREET * WASHINGTON BOULEVARD * HARBOR FREEWAY * VENICE BOULEVARD * UNION AVENUE * 14TH STREET * BURLINGTON AVENUE * PICO BOULEVARD * MAGNOLIA AVENUE * 12TH STREET * WESTMORELAND AVENUE * ELEVENTH STREET * VERMONT AVENUE * WILSHIRE BOULEVARD * KINGSLEY DRIVE * BEVERLY BOULEVARD * KINGSLEY DRIVE.

For assistance, please call Master Planning and Demographics, Facilities Services Division, at (213) 633-7606.

**APPROVED:** JAMES A. McCONNELL, JR., Chief Facilities Executive, Facilities Services Division

**DISTRIBUTION:**
School
Pupil Statistics
Transportation Branch
Master Planning and Demographics
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

## LETTERS FROM OTHER AGENCIES

## LETTER NO. 11

Los Angeles Unified School District
Rena Perez, Director
Facilities Service Division
KPMG Building
355 South Grand Avenue
Suite 1020
P.O. Box 513307-1307
Los Angeles, CA 90051-1307

### RESPONSE NO. 11-1

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Los Angeles Unified School District (LAUSD). The comment contains new information regarding school service areas, enrollments and capacities that updates the information in the Draft EIR. The information provided in the LAUSD's comments has been incorporated into the Final EIR. The revisions, however, do not change the conclusion of the Draft EIR that seating capacities at Gratts Primary Center and Castelar Elementary School would be exceeded by the Project or that Project impacts would be reduced to less than significance through the payment of facilities fees, per Government Code Section 65995.

### RESPONSE NO. 11-2

Thank you for your comment regarding the 2004-2005 Fingertip Facts presented on page 654, paragraphs 1 and 2 of Volume 2 of the Draft EIR. This information has been used to revise the information contained in the Draft EIR. Revised text describing the 2004-2005 and 2005-2006 Fingertip Facts is presented in Section II, Corrections and Additions of this Final EIR. However, the revision in the number of schools currently operated by the LAUSD is information that does not change the Draft EIR's impact analysis or alters the conclusions of the Draft EIR regarding the schools that would serve the Project.

**RESPONSE NO. 11-3**

In regard to the analysis in paragraph 3 on page 654 of Volume 2 of the Draft EIR regarding "eligible enrollment," the comment states that all LAUSD Enrollment and Capacity Reports already take into account portable classrooms on site, additions being built onto existing schools, student permit and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools. The Draft EIR has been amended to state that all LAUSD Enrollment and Capacity Reports already take into account this range of factors.

The text of the Draft EIR has been further amended to state that "eligible resident" enrollments may be less than actual enrollments mainly due to the implementation of multi-track calendars. In addition, the discussion in the Draft EIR has also been expanded to state that the key goal of the Superintendent and Board of Education is to return all schools to a traditional two-semester (one-track) calendar. The Draft EIR has also been corrected to state that "projected capacity," as reported in the Enrollments and Capacities Report, identifies the future school capacity after shifting to a two-semester (one-track) calendar and implementing operational goals such as a full-day kindergarten and class-size reduction. These revisions are presented in Section IV, Corrections and Additions of this Final EIR. The information regarding the goals of the Superintendent and the Board of Education to return all schools to a traditional calendar does not change the Draft EIR's impact analysis, or alter the conclusions of the Draft EIR regarding the future capacities of the elementary, middle, and senior high schools that would serve the Project.

**RESPONSE NO. 11-4**

The analysis in paragraph 1 on page 655 of Volume 2 of the Draft EIR regarding the criteria for school overcrowding has been revised and expanded to reflect the LAUSD's criteria for current and future overcrowding conditions, which are considered separately by the LAUSD. The corrected and expanded discussion is presented in Section IV, Corrections and Additions of this Final EIR. The change in the list of criteria for school overcrowding does not change the conclusions in the Draft EIR regarding a projected seating shortage at Gratts Primary Center and Castelar Elementary School, nor does it indicate that any of the other schools serving the Project would be overcrowded under the additional criteria.

**RESPONSE NO. 11-5**

The comment requires the inclusion of the Ninth Street Elementary School in the Draft EIR evaluation of schools within the Project's service area (page 656 of Volume 2 of the Draft EIR. Based on the LAUSD data attached to their comment letter, the 9th Street Elementary School, according to the 2006-2007 Enrollments and Capacities Reports, is projected to operate with a seat overage of 267 seats, based on a comparison of Resident Enrollment and Current Capacity. An expanded discussion of the 9th Street School is presented in Section IV, Corrections and Additions of this Final EIR. The inclusion of the Project within the 9th Street School service area does not change the conclusions of the Draft EIR. The 9th Street School is not projected to have a seating capacity shortage. In addition, the distribution of the Project's students to the 9th Street School would not change the seating capacity impacts at Gratts Primary Center and Castelar Elementary School. Therefore, this revision would not change the conclusions of the Draft EIR regarding school impacts.

**RESPONSE NO. 11-6**

The comment points out that the conclusion presented on page 656 of Volume 2 of the Draft EIR, which, in reference to the determination of capacity at Virgil Middle School and Belmont Senior High School, is based on a comparison between Actual Enrollments and Current Capacities. It is understood that differences between Actual Enrollments and Current Capacities cannot be directly compared. For this reason the Draft EIR has been revised to evaluate the difference between Resident Enrollment and Current Capacity to indicate the shortage or overage. It is also understood and reflected in the correction to the Draft EIR that in the cases of Virgil Middle School and Belmont Senior High School, Actual Enrollment totals reflect that LAUSD is currently enrolling students in other schools as a remedial measure for overcrowded conditions at the neighborhood school. It is noted that, with the comparison of Resident Enrollment and Current Capacity, the conclusion in the Draft EIR that Gratts Elementary School, Virgil Middle School, and Belmont High Senior High School would operate with seating shortages (paragraph 2 on page 656 of Volume 2 of the Draft EIR), would not change. In addition, with the comparison of Resident Enrollment and Current Capacity, the conclusion in the Draft EIR that Castelar Elementary would operate with a seating overage would also be correct. With the addition of 9th Street Elementary School (a fifth school identified by the LAUSD), it is also concluded according to a comparison of Resident Enrollment and Current Capacity that this school would also operate at a seating overage. The revised comparisons reflecting a comparison of Resident Enrollment and Current Capacity, rather than Actual Enrollments and Current Capacities would not change the conclusions of the Draft EIR or the finding that the project would have a potentially significant impact on schools in the service area (pages 663-664 and 666 of Volume 2 of the Draft EIR), which would be addressed and reduced

to a less than significant through the payment of new school construction fees (paragraph 1 on page 672 of Volume 2 of the Draft EIR). The corrected discussion is presented in Section IV, Corrections and Additions of this Final EIR.

**RESPONSE NO. 11-7**

The comment includes direction in finding additional information in LAUSD's 2006 "Strategic Execution Plan," and the accompanying websites providing this resource.

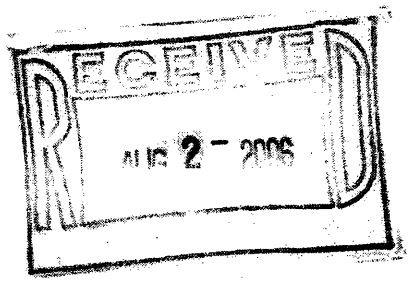
**RESPONSE NO. 11-8**

Attachments accompanying the LAUSD letter include "LAUSD Enrollments and Capacities for School Year 2006 –2007" and updated boundary descriptions for Ninth Street School, Evelyn T. Gratts School, Castelar School, Virgil Middle School and Belmont Senior High School. These documents support the comments earlier in the LAUSD letter, and responded to above, regarding the comparison of Resident Enrollment and Current Capacity to determine seating overages or shortages. In addition, the boundary descriptions support the LAUSD's comments regarding the inclusion of the Ninth Street School as a public elementary school that would serve the Project. No data provided in the attachments change the conclusions of the Draft EIR regarding the impact of the Project with respect to future seating capacity at Gratts Primary Center and Castelar Elementary School.

Letter No. 12

200 South Grand Avenue 213 621 2200 T www.colburnschool.edu
Los Angeles, CA 90012 213 621 2110 F

The Colburn School




August 1, 2006

Martha Welborne, Managing Director
Grand Avenue Committee
c/o California Community Foundation
445 South Figueroa, #3400
Los Angeles, CA 90071

Dear Martha,

On review of the draft EIR summary for the planned Grand Avenue Project, I have two main concerns which I would like to share with you: parking and noise. 12-1

- As you know, parking is a particular problem in this part of downtown, and the site bounded by 1st and 2nd Streets, Grand and Olive is presently dedicated to substantial parking which will of course be lost to use. The parcels west of Grand Avenue and south of Walt Disney Concert Hall – now dedicated to parking – will also eventually be developed as part of this plan. Page seven of the summary refers to "... public parking at a reasonable rate that will attract the public ...", yet I see no mention of any replacement of this parking which might contribute to the quoted statement. 12-2

  I do not believe that downtown parking is the responsibility of the Grand Avenue Project; however, there seems to be a disconnect in the EIR and I do envision this project worsening an already difficult situation.

  We are also concerned about parking for the estimated 250 to 600 construction workers. If this is not remote parking, it will clearly further exacerbate an already overtaxed parking situation in the local area. 12-3

- Regarding the noise issue, with an allowable construction schedule of Monday through Friday 7:00am–8:00pm and Saturday 8:00am–6:00pm, we may have a significant problem especially in the portions of our campus facing north (1st Street). Although our facilities have STC ratings of 35 to as high as 44, I am nonetheless concerned that, given the nature of what we do here, this may be significantly insufficient, most especially during our peak hours of 4:00 and later in music teaching studios, and at most construction hours in our library and performance lab, during periods of heavy construction work. 12-4

We are very supportive of the Grand Avenue Project, and we fully understand that urban construction adjacent to our facility will cause some inconvenience, just as our construction has inconvenienced our neighbors. Nonetheless, our concerns – particularly regarding noise – are real. 12-5

I hope that these concerns will be reviewed and addressed in some manner. Assuming that there is some form of communication group formed to deal with problems related to the project(s), we ask that a representative of the Colburn School be included. 12-6

Sincerely,

Joseph Thayer
Executive Director

JT:im

## LETTERS FROM PRIVATE ORGANIZATIONS

### LETTER NO. 12

The Colburn School
Joseph Thayer
Executive Director
200 South Grand Avenue
Los Angeles, CA 90012

### RESPONSE NO. 12-1

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Colburn School. The comment states that parking impacts and noise generated by the Project are the school's two main concerns. .

### RESPONSE NO. 12-2

The comment raises concerns about parking. The Draft EIR identifies a replacement strategy for the existing 1,074 publicly owned parking spaces on the Project site in other under-utilized County facilities in the Civic Center area, primarily in the Walt Disney Concert Hall garage (pages 301-302 of Volume 1 of the Draft EIR), and states that no significant parking impacts would occur. The Draft EIR also discusses the removal of 520 privately operated parking spaces (pages 302-303 of Volume 1 of the Draft EIR) which are not "by-right" uses of the underlying land but are, in effect, temporary uses of the land until a higher and better use is identified for those parcels. The Draft EIR also concludes that as these spaces represent only 3 percent of the overall parking supply in the Bunker Hill and Civic Center areas and, as parking spaces are generally available (based on drive-by and drive/walk-thru observations) in a number of other parking facilities in the area and other adjacent parts of downtown, and as some displaced parkers would be expected to use transit, no significant impacts would occur as a result of their removal. The Draft EIR, therefore, concludes that the Project would cause no significant impacts from the removal of existing parking on the Project site. The complete parking analysis is contained in Volume 1 of the Draft EIR (pages 289 through 311).

In addition the Draft EIR identifies that the Project would provide a total of 1,930 on-site parking spaces for the commercial uses in the Project, and concludes (page 300 of Volume 1 of

the Draft EIR) that this would be sufficient to meet the projected parking demand for the Project and thus, there would be no significant parking impacts generated by the proposed Project. No information is currently available at this early stage of Project planning on potential pricing of the new on-site parking. However it is in the interests of the Project to price the use of these new spaces such that they are affordable to visitors and patrons of the Project in order to ensure its economic success.

**RESPONSE NO. 12-3**

The comment raises concerns about parking for construction workers. Construction worker parking is addressed on page 257 of Volume 1 of the Draft EIR, where it is identified that some construction workers would be expected to take advantage of the significant transit service serving the site, but that for those who drive the developer proposes to enter into some form of temporary arrangement with parking garages in the area of the Project, or with surface lot operators elsewhere in downtown or its periphery, to provide a sufficient supply of off-street spaces for construction worker parking. With the implementation of that program (also defined in Mitigation Measure B-3 on page 318 of the Draft EIR) the Draft EIR concludes there would be no significant impacts from construction worker parking. Also, as previously discussed under Response No. 10-21, parking spaces are generally available in a number of other parking facilities in the area and other adjacent parts of downtown.

**RESPONSE NO. 12-4**

This comment raises concerns about noise impacts during construction. In your later comment on the Draft EIR, you suggested the formation of a "communication" group that would meet on an as needed basis to address issues concerning construction noise and traffic and any attendant impact on the School's performances and related activities. Based on a recent meeting between representatives of the Authority, the developer and the Colburn School, all parties are committed to a process where the developer and the School would meet on an ongoing basis to exchange all necessary information and formulate programs so as to best ensure that the School's activities would not be significantly disrupted by the construction of the Project. Staff for the Authority will recommend to the Authority's Board that it include an appropriate condition in any resolution approving the Project that would obligate the developer to lead such a coordination and communication process.

With regard to the Draft EIR analysis, the Colburn School was included as a sensitive land use given the close proximity of this use to the Project, out of respect for a quieter environment in classroom and learning environments. The Draft EIR evaluates and summarizes

the impact of construction noise on sensitive receptor sites in Table 69 on page 590 of Volume 2 of the Draft EIR, and concludes that, due to the proximity of the Colburn School, which is adjacent to the Project site, noise increases would be significant during the construction of Parcels Q, W-1/W-2, and L/M-2. Mitigation Measures G-1 and G-3 through G-5 (pages 603-604 of Volume 2 of the Draft EIR) would be implemented to attenuate construction noise impacts at sensitive receptor sites. Mitigation Measure G-6 (page 604 of Volume 2 of the Draft EIR) would provide for a liaison officer who would respond to any complaints regarding construction noise. With the implementation of these mitigation measures and the coordination of construction phases with activities at Colburn School, it is anticipated that the impact of construction noise would be reduced to the greatest extent feasible.

**RESPONSE NO. 12-5**

The Authority appreciates the support that the Colburn School expresses toward the Grand Avenue Project and its expression of understanding that urban construction adjacent to the Colburn School would cause some inconvenience. However, the Draft EIR identifies the Colburn School as a sensitive noise receptor (Vol. 2, Section IV.G, page 577 and 578) and an effort is made to mitigate construction noise impacts to the greatest extent feasible (Draft EIR, Vol. 2, Section IV.G, Noise, Mitigation Measures G-1 through G-7, pages 603 through 605).

**RESPONSE NO. 12-6**

The concerns expressed by the Colburn School would be addressed through the Project's Mitigation Monitoring and Reporting Program, through the implementation of all feasible mitigation measures available to the Authority, and through on-going coordination of construction activities with the scheduling of activities at the Colburn School. In a broader context, it is the intent of the Authority to require that the developer pro-actively coordinate construction phasing with the Colburn School as well as the other sensitive uses adjacent to the Project site throughout the construction process. The focus of this coordination would be to reduce, to the greatest extent feasible, construction noise impacts and other issues with respect to ongoing activities at the Colburn School and other adjacent sensitive facilities. Please refer to Response No. 12-4 regarding the establishment of the means by which coordination between the Authority and the Colburn School would occur during Project construction.

Letter No. 13

# LEGAL AID FOUNDATION OF LOS ANGELES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Writer's Direct Dial Number: 213-640-3968

August 3, 2006

Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa St., Suite 3400
Los Angeles, CA 90071
HAND-DELIVERED

**Re: Grand Avenue Project; Comments to Draft Environmental Impact Report, State Clearinghouse No. 2005091041**

Dear Ms. Welborne:

Thank you for the opportunity to provide the following written comments in response to the Draft Environmental Impact Report (DEIR) for the Grand Avenue Project (the "Project"). The Legal Aid Foundation of Los Angeles (LAFLA) submits these comments on behalf of the Grand Avenue Coalition for Community Benefits (the "Coalition"). The Coalition includes: Strategic Actions for a Just Economy (SAJE); Coalition LA; Esperanza Community Housing Corporation; the Los Angeles Community Action Network (LACAN); the Community Development Technologies Center; Los Angeles Metropolitan Churches; Concerned Citizens of South Central Los Angeles and Painters and Allied Trades District Counsel #36. Together, these organizations represent thousands of low-income and working class people who live and work in and around downtown Los Angeles and who will be impacted by the Project. Our shared purpose is to ensure *equitable development* in and around the core of Los Angeles; that is, development that benefits all who live and work there, including poor and working people. 13-1

The Project is uniquely situated in the downtown area and between stark representations of the extreme poles of Los Angeles. It is walking distance from magnificent new assets including Disney Hall and the new Cathedral. It is also walking distance from Skid Row, where the nation's largest homeless population resides near

other low-income people living in residential hotels. Because of its location and magnitude, the Project holds tremendous potential to benefit the local community; however, there is also a great risk of serious adverse impacts to local residents and the environment. 13-1

As the DEIR evidences, the Project is one of the most significant developments to be proposed for downtown in recent history. Its footprint and impacts will be felt throughout the City for years to come. It is also a significantly public project. It has been overseen by a unique joint powers authority, it involves numerous public agreements and contracts, and, at a time of diminishing public resources, it requires significant financial investments by both the City and the County. A project of such environmental, economic, and political significance truly needs to do more. It needs to:

**1. Fix What's Broken:** The Project needs to contribute commensurately to fixing the widening divide between rich and poor in this City. This divide, now the broadest in the country, is the single most environmental threat to the success of downtown Los Angeles, as pointed out by New York officials, as well as to the City as a whole.

**2. Do No Harm:** The Project must not contribute to increasing this widening divide. It must not exacerbate the City's energy, traffic, transportation, and air quality problems. It must not increase an imbalance between jobs and housing. As it currently stands, and as pointed out by this review, the Project does all of these things. It does not include an energy analysis; it asserts that traffic and transportation and air quality issues presented by the Project are not completely mitigatible, and there is no meaningful presentation of how a balanced view of the Project's jobs and housing can precisely serve this end. 13-2

**3. Do Good:** The significance of the Project as a public collaboration and investment requires more than minimal mitigation. It needs to model the values of what kind of City we want Los Angeles to be. In our mind, this is one of increased equity of opportunity, where people of all classes can live in proximity, where low-income people can rise up through better jobs and housing, and where all of our children will be able to afford to live.

It is this context that frames our perspective on the DEIR. It is always the case that the goal of CEQA is to prevent and mitigate negative environmental impacts. And, according to this standard, we find the DEIR to be lacking, as described in detail below. Thus our comments on the DEIR may be summarized as follows:

1. **A stronger nexus needs to be built between transportation, housing, and jobs at a level of detail that will produce meaningful results. The Project is uniquely situated for this to be possible.**

2. **Far greater attention must be paid to the adverse impact of the Project on the health, social and economic conditions of the existing residents of downtown, many of whom are homeless.**

3. **A stronger relationship needs to be built between the benefits that may be derived from the Project and the underserved, underhoused, and underemployed residents of Skid Row and South Central Los Angeles.**

4. **These efforts, taken to a refined level of specificity and implemented in a meaningful way, will serve to mitigate the Project's adverse environmental impacts.**

With this in mind, LAFLA submits the following comments on behalf of the Coalition. The Coalition affirms its intention and commitment to work with the Los Angeles Grand Avenue Authority (the "Authority"), the City of Los Angeles, and other interested parties, to develop a consensus proposal that addresses our concerns through a comprehensive community benefits program. The Coalition looks forward to a constructive dialogue and negotiation process that will balance the needs of Project with the interests of neighboring communities in a healthier environment and better economic opportunities. As we explain further below, this community benefits program would mitigate the Project's adverse environmental impacts. 13-2

## GENERAL COMMENTS

The DEIR suffers from a number of flaws, many of which can be traced to (1) a failure to adequately consider the Project's impact on existing residents and (2) a series of incorrect assumptions about transportation, housing and jobs and the relationship between these elements.

Considerable time and effort has been put into the DEIR, and for this we commend the Authority and other participants in this process. However, as set forth below, major adjustments and expansion are necessary in order to arrive at a legally adequate and appropriate EIR. Determinations made by lead agencies in an EIR must be supported by substantial evidence. Cal. Pub. Res. Code §§ 21168, 21168.5; 14 Cal. Code Regs §§ 15091, 15384 (CEQA Guidelines). Here, the DEIR fails to provide substantial evidence for certain key factual assumptions. These omissions, in addition to our other concerns, are addressed in detail below. 13-3

## AFFECTED ENVIRONMENT, CONSEQUENCES, AND MITIGATION MEASURES

### A. Energy

#### 1. The EIR Is Legally Required to Include an Analysis of Energy Impacts 13-4

Appendix F of the CEQA Guidelines states, "[i]n order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and

unnecessary consumption of energy." Appendix F further provides a long and detailed list of energy impact possibilities and potential conservation measures designed to assist in the preparation of an EIR.

Further, CEQA requires the Authority to identify all possible significant adverse environmental impacts of the Project. (Calif. Pub. Res. Code §21100(b)(1); Guidelines §15126.2.) California courts have recognized energy consumption as having a significant adverse environmental impact for CEQA purposes. *See, e.g., County Sanitation Dist. No. 2 v. County of Kern*, (2005) 127 Cal. App. 4th 1544, 1590 ("a fair argument can be made that the increased energy use caused by further treatment processes would cause a significant effect on the environment"); *City of Redlands v. County of San Bernardino*, (2002) 96 Cal. App. 4th 398, 412-14 (upholding trial court order to prepare EIR based in part on potential for increased energy consumption).

Accordingly, the Project EIR will be legally insufficient if it does not contain an analysis of energy impacts.

**2. The Project Is Likely to Have a Significant Energy Impact**

During the month of July, 2006, the state of California broke the all time record for energy use. (Patricia Jiayi Ho, "HOT HAND: ISO weathers the crisis," Pasadena Star News, July 25, 2006). On July 24, 2006, the California Independent Systems Operator (California ISO) issued a Stage Two Emergency, meaning that the state's operating reserves of power were at less than five percent. On that date, the California ISO warned of a possible Stage Three Emergency and rotating blackouts. (California ISO, News Release, July 24, 2006, "CALIFORNIA ISO DECLARES STAGE TWO EMERGENCY"). 13-4

The Project is a "24-hour development" (DEIR p.7) consisting of 449,000 square feet of retail space, a 275 room hotel, 2,020 residential units and either 681,000 square feet of County office space or 600 additional residential units (DEIR p. 10-11). The Project will generate either 2,925 or 3,777 residents and either 1,206 or 3930 employees. (DEIR p. 45). Appendix D-3 to the EIR contains estimates that the Project will use 27 million kilowatt hours per year of electricity with the Residential Option or 32.5 million kilowatt hours per year of electricity with the County Building Option. This represents a massive increase in the levels of energy consumption over those generated by the current use, which is open space and surface and subterranean parking lots. (DEIR, p. 105-110).

The building materials used to construct the Project will have a major impact on the environment in the downtown area. The Environmental Affairs Department of the City of Los Angeles has acknowledged the Urban Heat Island Effect created by building without energy efficient materials and sufficient tree coverage. There is a real human impact to the urban heat island effect. The heat island effect not only forces the use of more energy to cool indoor environments, but also renders the downtown area even more unbearably hot for those who have to live outdoors or without air conditioning.

### 3. The DEIR Fails to Include an Energy Impact Analysis

Despite the aforementioned legal requirements and the Project's obvious potential for significant energy impact, the Draft EIR contains no dedicated analysis of energy implications of the Project. The Project description does not discuss energy consumption or energy-related Project features. The environmental setting discussion fails to include existing energy supplies and energy use patterns in the region and locality. The impact analysis contains no discussion of energy use, its impact on existing supply, or compliance with existing energy standards. There is no analysis of energy-related mitigation measures, nor is there a comparison of Project alternatives in terms of energy impact. These are omissions of major significance for the adequacy of the EIR.

In the Air Quality analysis, the DEIR does include an examination of air quality impacts based on energy and natural gas consumption associated with Project occupation and operation. (DEIR p. 543, 555). Notably, the NOx emissions associated with energy and natural gas consumption alone exceed the applicable SQAMD significance threshold. (*Id.*) This discussion, however, is limited to the issue of regional air quality impact, and thus falls well short of the comprehensive energy analysis described in CEQA Guidelines Appendix F.

### 4. The EIR Should Analyze Project Compliance with State Energy Efficiency Standards and Leadership in Energy and Environmental Design (LEED) Standards

13-4

The CEQA Guidelines indicate that an EIR should analyze "the degree to which the project complies with existing energy standards." CEQA Guidelines Appendix F § II.C.(4).

The Draft EIR indicates that the Project will employ plans and specifications to ensure that all Project buildings meet California Title 24 Energy Efficiency standards for water heating, space heating and cooling. (Regulatory Measure F-2, DEIR p. 565). However, the Project must meet *all* Title 24 Energy Efficiency Standards in order to receive a building permit. The Standards cover, among other things, building envelope, indoor lighting, outdoor lighting and signage, with different standards specific to various elements of the Project such as high-rise residential, hotel/motel, etc. The DEIR contains no explicit analysis of the Project's compliance with the Title 24 Energy Efficiency standards. This is a significant omission which should be corrected.

The EIR should also analyze the Project's compliance with the Leadership in Energy and Environmental Design (LEED) system developed by the U.S. Green Building Council. The LEED guidelines encourage use of non-toxic materials, renewable energy and water efficiency. Just some of the vital LEED categories not covered by the DEIR are: renewable energy, green power and building materials.

If a building or project meets certain specific criteria under the LEED guidelines, the building or project can seek certification under the program. We encourage the Authority to seek the platinum certification under the LEED guidelines, utilizing the cleanest and most energy efficient building standards. According to the U.S. Green Building Council, such LEED buildings can be built within a mere 2-3% cost increase, and often the energy savings pay back that extra cost in short order. 13-4

The City of Los Angeles has a LEED Ordinance that requires a LEED "Certified" Level for all Department of Public Works new design and construction building projects 7,500 square feet or larger. Moreover, legislation pending before the Los Angeles City Council calls for the study of a policy under which the City would only lease facilities that are equipped with energy and water efficiency systems or meet Leadership in Energy and Environmental Design (LEED) standards. The Project, which sits on land leased from the City and County of Los Angeles, should move in the direction of City policy and pursue LEED certification.

**B. Traffic Impacts**

The DEIR identifies a number of significant traffic impacts from the Project. These impacts would exacerbate already low services levels at a number of key intersections in and around the Project site. Putting aside mitigation measures for the moment, the Project anticipates significant traffic impacts on seven intersections in the A.M. peak hour (DEIR, p. 265.) and seventeen in the P.M. peak hour. (DEIR, p. 270). These include nearly all of the major intersections in and around the Project area. In all but two of these intersections, the resultant Level of Service would be rated at D (fair), E (poor), or F (gridlocked). Even with the proposed mitigation measures in place, the DEIR concludes that the Project will result in significant continuing traffic impacts. Specifically, during operation (after construction) the Project would cause one significant impact on intersection service levels in the morning peak hour and 13 significant impacts in the evening peak hour. (DEIR, p. 322). 13-5

**1. The DEIR's Analysis of Construction Worker Traffic Is Inadequate**

Construction of the Project is estimated to require 250 to 600 workers on site each work day. (DEIR, p. 255). The DEIR states, "[i]n general, the majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding travel during the A.M. and P.M. peak traffic periods." (DEIR, p. 312; see also 255, Appendix B, 106). This statement is the sole basis provided in the DEIR for the conclusion that the impact and cumulative impact of construction worker traffic are not significant. No explanation is given for the reported expectation that workers will arrive early and leave early. No analysis is provided for the contingency that construction worker trips do occur during peak hours. More importantly, ignorance of 13-6

potential significant effects here prevents consideration of adequate mitigation measures. The DEIR does not meet CEQA requirements on this point. 13-6

### 2. The DEIR Relies on Questionable Assumptions Regarding Reduced Trip Generation

These estimates already take into account substantial reductions in estimated trip generation from that which would be expected based on the Institute for Transportation Engineers (ITE) *Trip Generation* source book. These reductions are based on the Project's characteristics as an urban, transit-oriented project and by consideration of rates of pedestrian, bicycle and transit use for other parts of downtown Los Angeles. The adjustments reduce residential trips by 29 percent, hotel trips by 34 percent, office trips by 45 percent, retail trips by 55 percent, restaurant trips by 50 percent, event facility trips by 23 percent, and health club trips by 62 percent.

There may be substantial reasons to believe that the anticipated reductions will not in fact be realized. The DEIR assumes that residents of the new development will own cars at a lower rate than other Los Angeles residents. (DEIR, p. 293.) The DEIR speculates: "[t]he Project will attract homeowners who are looking for an urban lifestyle—one where people can walk or use transit to get to many destinations, and thus have less of a need for a car." (DEIR. p. 293.) Speculation can be countered by speculation: residents and users of the new and upscale development will come from middle and upper income brackets and will be more likely to use cars rather than public transportation. This is evidenced by the fact that the vast majority of public transit users are low-income; a full sixty-eight percent of those taking transit in Los Angeles have incomes under $15,000. (Douglas P. Shuit, "Restless Riders," L.A. Times, Sept. 7, 2000, 1.) The DEIR's assumption about use of cars inevitably compromises analysis of traffic and parking impacts. "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate . . . does not constitute substantial evidence." CEQA Guidelines, §15384(a). Thus, the current DEIR analysis of associated traffic and parking impacts is inadequate. Effective mitigation analysis needs to be informed by accurate impacts analysis. 13-7

### 3. The Project's Design Does Not Encourage Non-Automobile Travel

The Project's design does not conform to the kind of urban development patterns that typically give rise to high rates of non-automobile travel. Those kinds of development typically have narrow streets with short blocks and all storefronts and buildings abutting the sidewalk, a plethora of diverse, small and medium businesses, a predominantly low- to middle-income demographic profile, a lack of off-street parking, etcetera. The Project, as envisioned, does not anticipate any of the above-noted factors. The fact that the Project is located *in* downtown does not in and of itself guarantee that people will not use automobiles to access it. There are no metrics or evidence offered to support these anticipated reductions in projected automobile trips by users of the Project. 13-8

**C. Population, Housing, and Employment**

The Project's County Office Building Option is forecasted to generate 2,925 residents and 3,930 employees, while the Additional Residential Development Option is estimated to generate a residential population of 3,777 and 1,206 employees. The increase in population growth within the Central City Community Plan (Plan) area attributable to the Project is greater than projected under the original Plan. Because this growth would allegedly support policies to reduce the jobs/housing ratio per the DEIR, population and housing impacts are concluded to be less than significant. 13-9

However, because both options create larger than projected growth, the jobs/housing ratio may actually be increased. Specifically, under the County Office Building Option, the jobs/housing ratio is increased to 1.3/1. In addition, under both options the cumulative impacts greatly increase the jobs/housing ratio (61,158 employees to 28,952 residents, and 65,364 employees to 31,877 residents). Thus, the cumulative impacts of the Project on the jobs/housing ratio are significant, so that the *DEIR incorrectly states that the jobs/housing ratio is reduced, and incorrectly asserts that growth is insignificant.* Therefore, the population and housing section should be revised to include appropriate mitigation measures and level of significance.

The Housing Element of the City's General Plan states that 47% of all new housing in the City should be affordable. This standard will never be achieved unless major projects like Grand Avenue make significant contributions to the affordable housing stock. In addition, as we discuss in the Mitigation Measures section below, local hiring and affordable housing are key to resolving unmitigated traffic, transportation and air quality issues presented by the Project. 13-10

**D. Air Quality Impacts**

Despite a number of mitigation measures put forward in the DEIR, the air quality impacts related to construction and permanent operations remain significant and allegedly unavoidable. We believe that there is much more that could be done to mitigate the air quality impacts of the Project.

Emissions from Project operations are divided into three main categories: (1) indirect sources; (2) area sources; and (3) stationary sources. Indirect sources are defined as building, facilities, structures, or properties that attract or generate mobile source activity (autos and trucks). This includes retail uses, employment sites, housing development, etc. Area sources are sources that individually emit small quantities or air pollutants, but which cumulatively may represent significant quantities of emissions. Water heaters, lawn maintenance equipment, and the application of paints and lacquers during maintenance activities are examples of area sources emissions. Stationary, or point, sources are equipment or devices operating at commercial facilities that directly emit air pollutants. 13-11

As articulated in the DEIR, unmitigated significant air impacts will also result from Project construction activities. First and foremost is the danger presented by heavy-duty diesel non-road vehicles used in construction. Backhoes, bulldozers, excavation machines, dump trucks, cranes, diesel generators and all-terrain vehicles all present a special threat to air quality.

Nationally, non-road diesel engines emit more fine particles than all the nation's passenger cars and trucks, heavy-duty on-road diesels and electric utilities *combined.* Diesel particles pose the single greatest source of cancer risk from air pollution. Public health organizations, including the National Institute for Occupational Safety and Health, the World Health Organization, the U.S. Environmental Protection Agency (EPA), the California EPA and the Department of Health and Human Service's National Toxicology Program, have associated diesel exhaust or diesel particulates with increased risk of cancer. Epidemiological studies show increased lung cancer risks ranging from 20% to 89%. 13-11

In addition, the fine particles from diesel that are breathed deep into the lungs are responsible for thousands of premature deaths from other causes every year. There is a well-researched body of epidemiological studies from around the world that documents the serious effects associated with exposure to particulates. These studies report an association between particulate air pollution and reductions in lung function, respiratory symptoms, school absenteeism, increased use of asthma medications, doctor visits, emergency room visits, hospital admissions and premature death.

During the construction phase, localized PM10 and NO2 impacts would be significant (DEIR, p. 540-541.) Moreover, with respect to operations, "the Proposed Project would exceed regional SCAQMD thresholds for VOC, CO, NOx and PM10 and impacts associated with these criteria pollutants would be significant" (DEIR, p. 542-3.)

Given the already poor state of air quality in the downtown Los Angeles area, the outcomes described above are unacceptable and further mitigation measures should be analyzed, as described below. Additionally, the DEIR's analysis of air quality impacts on existing downtown residents is inadequate. The more than 8,000 homeless residents of downtown, who are outside a great majority of the time will bear the brunt of the Project's negative impact on air quality. The DEIR should specifically analyze the Project's impact on these sensitive receptors. 13-12

**E. Public Services**

**1. Fire Services, Police Services and Other Emergency Services**

The DEIR states that Project construction may result in temporary lane closures that would potentially affect emergency access; and that construction activities may temporarily increase the demand on fire services due to the presence of combustible 13-13

materials. Emergency access is crucial to the downtown community, especially because there is a disproportionately high number of elderly residents and residents with disabilities. Any delay in emergency services to these groups could mean life or death for these residents; thus, any impact that delays access to emergency services is significant. 13-13

Downtown residents currently face high waiting times for emergency services, especially police assistance. Currently, response times for LAPD's Central Area Division are under par. This Project will increase the ratio of crimes per officer from 20 to 23.4. (DEIR, p. 647.) In addition, according to the DEIR, the cumulative impact will be to increase crimes per officer from 20 to 59, approximately three times greater than the 19 crimes that are currently handled by each officer Citywide. (DEIR, p. 648.) The DEIR states that if additional officers are not added to the force, the increased demand will "constitute a substantial exceedance [sic] of LAPD's capacity to provide services. Thus, cumulative impacts with regard to police protection services would be significant." Id. The DEIR then states that if the City "added resources" in response to the growth, the cumulative impacts would be less significant. Id. However, because it is uncertain whether the City will be able to contribute more resources in this area, and what the scope of the resources would be, the cumulative impacts as they are laid out are significant.

Additionally, the DEIR states that increased activity within the five development parcels and the Civic Park would likely result in increased demand for police services. This problem is partially addressed by suggestion that private security personnel will be utilized in the park. Under this scenario, the DEIR states that the demand for services provided by the LAPD is not anticipated to increase. However, it is unclear whether private security will decrease demand for LAPD services. There is no proposal regarding the provision of the security guards or their ability to respond to crises currently faced by public entities like the LAPD. Also, the use of private security in the park may significantly limit access to the park by all Downtown residents, including low-income and homeless residents. 13-14

The DEIR asserts that none of these changes would constitute a significant impact. However, this claim is based on a scenario where the City *added resources* in response to growth, and/or *if* private resources for security were included in the plan. Because of the currently insufficient response times of public entities, the uncertainty of the City's ability to contribute more resources to this area, and the uncertainty of the availability or effectiveness of private security personnel, these changes will have an adverse impact on residents, and thus are significant impacts.

**2. Parks and Recreation**

Under the Quimby Act, development entities must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. Cal. Gov't. Code §66477. The fees must be paid and land conveyed directly to the local public agencies that provide park and recreation services community-wide. The Act requires the provision of three acres of park area per 1,000 persons 13-15

residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the City may adopt a higher standard not to exceed five acres per 1,000 residents. *Id.* Additionally, there are acreage and population standards and formulas for determining the exaction, and agencies must clearly show a strong direct relationship or nexus between the park fee exactions and the proposed project. Local ordinances must now include definite standards for determining the proportion of the subdivision to be dedicated and the amount of the fee to be paid. *Id.* 13-15

The Quimby standards of three acres per 1,000 persons will not be achieved on this site. If the in-lieu fee is chosen as the mitigation measure, the in-lieu fee should be used to create park space based on the most park-poor communities in Los Angeles. Additionally, the park space should be guaranteed to meet the park needs of all Downtown residents and specific mitigation measures should be listed to ensure inclusive access to the park.

**F. Mitigation Measures**

**1. General Comments**

Under CEQA, for each identified significant adverse environmental impact, an EIR must identify specific mitigation measures. CEQA Guidelines § 15126.4. According to the California Supreme Court, analysis of alternatives and mitigation measures is "the core" of an EIR. *Citizens of Goleta Valley v. Board of Supervisors*, (1990) 52 Cal. 3d 553, 564. "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified." CEQA Guidelines § 15126.4(a)(1)(B). The DEIR fails to discuss certain mitigation measures, in violation of § 15126.4(a)(1)(B). Further, DEIR findings concerning whether certain significant impacts are mitigated and to what extent impacts are mitigated are not supported by substantial evidence, in violation of §§ 21168, 21168.5 of the California Public Resources Code. *See Mira Mar Mobile Community v. City of Oceanside*, (2004) 119 Cal. App. 4th 477, 495 (opining that mitigation findings must be supported by substantial evidence); *National Parks & Conserv. Ass'n v. County of Riverside*, (1999) 71 Cal. App. 4th 1341, 1366 (same). 13-16

CEQA requires that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." CEQA Guidelines §15126.4(a)(2). To assure the fulfillment of this commitment, we request that the Authority include clear and specific criteria for monitoring implementation, binding deadlines, and a public right of enforcement when adopting its Project commitments and mitigation measures. We ask that the public right of enforcement provide that any board, officer, person, corporation or association or by any person acting for the interests of itself, its members, or the general public have the right to bring a legal complaint to enforce compliance with these commitments and mitigation measures in state or federal court. Providing for a public right of enforcement would be consistent with implied and express commitments made in the DEIR and provide the best and most effective 13-17

guarantee that the Project commitments and mitigation measures will be fully implemented. 13-17

**2. Energy**

California law requires the EIR to contain "[m]itigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Cal. Pub. Rec. Code § 21100(b)(3). The discussion of these mitigation measures should "explain why certain measures were incorporated in the project and why other measures were dismissed." CEQA Guidelines Appendix F § II.D.(1) 13-18

The DEIR does contain two energy-related mitigation measures: (1) exterior lighting regulated by automating shut-off (Mitigation Measure F-14, DEIR p. 564) and (2) plans and specifications to ensure that all Project buildings meet California Title 24 Energy Efficiency standards for water heating, space heating and cooling. (Regulatory Measure F-2, DEIR p. 565). The mere inclusion of these mitigation measures is woefully inadequate. The EIR should analyze a full range of mitigation measures that would reduce the Project's energy impacts. The LEED Guidelines should provide a sound basis for this analysis.

**3. Traffic Mitigation**

The City of Los Angeles Department of Transportation (LADOT) proposes to mitigate traffic impacts through implementation of Transportation Demand Management (TDM) programs with respect to development of the major parcels, implementation of Adaptive Traffic Control System technologies in the area, as well as selections from a "menu" of mitigation measures to be determined at a later date by LADOT. With the exception of the very specific proposal around improvements related to the ATCS system, the mitigation measures included in the DEIR are vague. It is difficult to determine exactly how the calculations of the effects of the mitigation measures were done when it is not clear which ones will ultimately be pursued. The developer and LADOT should be required to specify exactly which traffic mitigation measures will be required, which will be promoted and how implementation will be monitored. 13-19

Mitigation Measure B-5 involves an upgraded ATCS program. (DEIR, pp. 318-19.) This mitigation measure is supposed to mitigate significant traffic impacts at six intersections in the morning peak hour and three intersections in the evening peak hour. (DEIR, Appendix B, p. 160.) Mitigation Measure B-4 involves a Transportation Demand Management (TDM) program to be implemented if the County Office Building option is pursued. (DEIR, p. 318.) This measure is calculated to mitigate a significant traffic impact at one intersection in the evening peak hour. (DEIR, Appendix B, p. 162.) *Yet the DEIR, even in the relevant appendix, fails to provide the evidence and analysis showing how and to what extent these plans actually mitigate traffic impacts.* Some additional explanation as to method is provided in the Appendix. (DEIR, Appendix B, pp. 158- 13-20

179). But while conclusions are included, the factual bases for those conclusions are not. Thus, the substantial evidence standard is not met. 13-20

Traffic impacts must be further mitigated. The DEIR concludes that truck activity may cause significant traffic impacts during construction. (DEIR, p. 254). At the same time, the DEIR concludes the impacts of traffic generated by workers traveling to and from the work site would be negligible. (DEIR, p. 255.) Noticeably, the DEIR fails to recognize that truck traffic and worker traffic considered cumulatively would cause significant impacts. (DEIR, p. 312.) In reaching the conclusion that worker trips are insignificant, the DEIR assumes without foundation that workers would arrive and depart during non-peak hours. Absent any substantial evidence for this assertion, the DEIR must provide mitigation measures to mitigate this cumulative significant impact. 13-21

The DEIR concludes that even after other mitigation measures are implemented, the Project would result in significant traffic impacts, thus exacerbating an already well-below acceptable traffic situation. Specifically, during operation (after construction) the Project would cause one significant impact on intersection service levels in the morning peak hour and 13 significant impacts in the evening peak hour. (DEIR, p. 322.) There are a number of changes to the Project itself that could serve to reduce its traffic impacts.

Given the aforementioned fact that lower-income people have much higher rates of public transit usage, even given similar levels of service availability, one way of reducing traffic impacts could be to increase the proportion of affordable housing units. If greater numbers of units in the Project were made available to people of low- and very-low incomes, it could be reasonably anticipated that the impacts on the local transportation networks would be significantly reduced. A commitment by the developer to increase the proportion of affordable housing should be included in this EIR as a mitigation measure for its anticipated traffic impacts. 13-22

In order to mitigate truck and worker traffic, the DEIR should discuss and recommend a strong local hiring program in connection with construction and operation. Local hiring would increase the number of workers who can walk to the job site, decrease the number of cars traveling to and from downtown, and decrease car emissions. The trip reductions would occur not only because of the tendency of people of lower incomes to use public transit, but also because of the high degree of proximity of low-income communities such as Skid Row to the Project. In addition, local hiring has the potential to provide work for low income individuals and even reduce demand for public assistance. By contributing to the economic advancement of low-income downtown residents, the Project may also simultaneously enhance its efficacy as a revitalizing force in downtown generally. Therefore, we would suggest that the developer be asked create a program to hire low-income residents of the downtown area as one means of reducing the number automobile trips to be generated by the Project. But the DEIR neglects to quantify or even mention this mitigation measure. Arguably, this omission violates CEQA Guidelines. CEQA Guidelines § 15126.4(a)(1)(B). 13-23

**4. Air Quality Mitigation**

Despite a number of mitigation measures put forward in the document, the air quality impacts related to construction and permanent operations remain significant and allegedly unavoidable. Air quality impacts also must be further mitigated. The South Coast Air Quality Management District (SCAQMD) Air Quality Management Plans (AQMP) recommend implementation of all feasible mitigation measures. (DEIR, pp. 551, 552.) CEQA Guidelines §15126.4(a)(1)(B) minimally require discussion of available mitigation measures and explanation of the basis for selection of mitigation measures implemented. Further, for every significant effect, an EIR must provide sufficient information to enable lead agencies to make one of three findings, including the following: "(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. . . . (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or project alternatives identified in the final EIR." CEQA Guidelines § 15091(a). 13-24

We believe that there is much more that could be done to mitigate the air quality impacts of the Project. The DEIR does not require or even mention local hiring as a mitigation measure. The DEIR informs that even after other mitigation measures are implemented, emissions of $NO_X$, CO, and VOC would exceed the threshold of significance for regional impacts during construction, while $PM_{10}$ and $NO_2$ emissions would have a localized significant impact during construction. (DEIR, p. 566.) During operation, CO, VOC, $PM_{10}$, and $NO_X$ emissions would have a significant regional impact despite the use of other mitigation measures. (DEIR, p. 567.) Local hiring, with its reduction in traffic, would further mitigate some of these harmful emissions. Thus, the DEIR must discuss this mitigation measure. 13-25

In addition, the DEIR does not require or mention the use of selective catalytic reduction systems to mitigate nitrogen oxide emissions, though the DEIR found that nitrogen oxide emissions will be significant. (DEIR, pp. 540-43, 547, 554, 556, 558-59.) Even after implementation of identified mitigation measures, nitrogen oxide emissions would constitute a significant impact, both during construction and operation. (DEIR, pp. 566-67.) This omission runs afoul of CEQA Guidelines § 15126.4(a)(1)(B). 13-26

Nor does the DEIR adequately discuss the use of diesel particulate filters. (DEIR, p. 563.) Diesel $PM_{10}$ constitutes "[t]he primary source of potential air toxics associated with proposed Project operations". (DEIR, p. 547.) Yet diesel $PM_{10}$ remains a significant impact during both construction and operation even after other mitigation measures are employed. (DEIR, p. 566-67.) The DEIR does not provide analysis to establish the feasibility or infeasibility of diesel particulate filters as a mitigation measure. Consequently, the DEIR deviates from CEQA Guidelines § 15091(a), which requires lead agencies to determine whether mitigation measures are feasible, whether they have been required in or incorporated into the project, and whether they avoid or substantially lessen the impact. CEQA is designed "to ensure that feasible mitigation measures will actually 13-27

be implemented as a condition of development, and not merely adopted and then neglected or disregarded." *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles*, 83 Cal. App. 4th 1252, 1261 (2000). The present DEIR does not facilitate this purpose. 13-27

Similarly, the DEIR fails to evaluate the extent to which each air quality mitigation measure decreases the corresponding significant impact. The DEIR provides more specific analysis when discussing traffic impacts, but not in discussing air quality. As mentioned above, EIRs must provide sufficient information to allow an agency to determine whether each proposed mitigation measure avoids or substantially lessens the relevant significant impact. *CEQA Guidelines § 15091(a)*. Here, the DEIR provides only cursory and inadequate analysis. In order to comply with CEQA and serve its purpose, the DEIR must provide clear analysis of the effect of each mitigation measure. 13-28

As noted, one means of mitigating emissions would be use the Leadership in Energy and Environmental Design – New Construction (LEED-NC) standards developed by the U.S. Green Building Council to guide Project design and construction practices so as to minimize the regional impacts of emissions related to energy use. LEED for New Construction and Major Renovations (LEED-NC) is a green building rating system that was designed to guide and distinguish high-performance commercial and institutional projects, with a focus on office buildings. Practitioners have also applied the standards to K-12 schools, multi-unit residential buildings, manufacturing plants, laboratories and many other building types. We again encourage the developer to seek platinum certification under the LEED guidelines, utilizing the cleanest and most energy efficient building standards. 13-29

In order to reduce emissions associated with private automobile usage, the developer should encourage public transit usage by paying for free transit passes for workers and residents of any new development up front during the construction phase. The transit pass would then come with the residential or commercial space in the same way that a parking space commonly does. 13-30

As noted, the downtown Los Angeles area already suffers from poor air quality and its related health impacts. The Project, as envisioned, would make a bad situation even worse. As a means of mitigating these impacts, the developer should agree to fund community environmental health programs to study health needs, environmental indicators, levels of exposure and establish clinics and other programs to address and ameliorate these impacts. 13-31

**5. Proactive Mitigation Measures and Community Benefits**

The DEIR inadequately and inconsistently addresses a number of issues related to the economic and social impacts of the Project. The Authority should adopt mitigation measures to minimize the negative economic impact of the Project and to render the Project consistent with its stated purposes. 13-32

The Coalition recommends that the following Community Benefits be implemented as mitigation measures:

**a. Local Hiring.** As noted, local hiring would make possible reduced traffic and emissions impacts, and help ensure that the Project has a positive social and economic impact. The Project should have local hiring goals and requirements of up to 50%, which should be set at different levels in these three primary areas: Construction, Construction Apprenticeships and Permanent Jobs. Specifically, the Coalition seeks a minimum goal of 30% and a requirement of 15% for local hiring in construction jobs, all of which should be *new* hires, and a minimum goal of 50% and a requirement of 30% for local hiring in permanent jobs which may include jobs in the service sector as well as in administrative and managerial positions. The Project should also maintain an agreed-upon percentage of apprentices throughout. We would also like to see that job applicants for local hiring be targeted as:

**(1)** First Priority: Low-Income Individuals living within a two-mile radius of the Project.
**(2)** Second Priority: Low-Income Individuals living within a five-mile radius of the Project.
**(3)** Third Priority: Low-Income Individuals living in census tracts or zip codes throughout the City for which more than 80% of the households, household income is no greater than 80% of the median household income for the Standard Metropolitan Statistical Area. 13-33

**b. Job Training and Retention Services.** The Project is estimated to generate over 5,300 permanent jobs and 24,000 construction jobs. These proposed job training and retention services are essential to ensuring that local hiring can occur on a meaningful scale, and to support the above local hiring goals. The Project should provide $10 Million (or 1% of total Project cost) in funds prior to groundbreaking to support and expand existing resources for a first-source hiring program, job training for permanent jobs, coordination with apprenticeship programs and apprenticeship-preparation programs for construction trades jobs. In addition, these funds should also support job retention assistance such as child care and literacy, to help meet the needs of a diverse population. This investment would allow 2,500 local residents to receive training and services essential to accessing and retaining jobs on the Project. The funding should come from public funds raised by the Coalition and matched by the Developer.

**c. Union Jobs.** In order to ensure a positive social and economic impact, the Project should have a Project Labor Agreement for all construction jobs that includes the local hiring requirements discussed above. The Developer should require card check neutrality agreements for all hotel facilities, including restaurants, and all building services, including janitors and security guards. The Developer should support security officers' right to select the union of their choice (including SEIU) and should only hire responsible security contractors committed to raising standards and

abiding by labor laws. The Developer should support the L.A. Safe and Secure Initiative for a City program that raises building security standards, and the developer should support SEIU's involvement in that program. The developer should only use responsible janitorial and window washers contractors that meet all prevailing standards. Lists of qualified responsible contractors that provide janitorial and maintenance services for commercial, residential, and public spaces are available upon request from SEIU Local 1877.

**d. Affordable Housing.** As noted, the Project is expected to generate 5,300 permanent jobs and 24,000 construction jobs. Yet, even households with members earning the Living Wage required at the Project do not reach 50% of AMI. Currently, the Project is expected to provide a maximum of only 412 affordable housing units, only a portion of which will be affordable to households at 50% of AMI. In order for the Project to actually contribute to an improved jobs-housing balance, many more housing units affordable to individuals working on the Project are necessary. Specifically, 25% of all Project units should be affordable to Households between 30% and 50% of the Los Angeles Area Median Income, without the option of in-lieu fees, broken down as follows: 25% affordable to families earning zero to 30% of Area Median Income ("AMI"); 75% affordable to families earning up to 50% of AMI. This includes both rental and ownership units. 13-33

**e. Homelessness Prevention.** The extensive downtown population of homeless and nearly-homeless, as well their need for decent housing with supportive services, is well documented and easily observed. In order to mitigate the noted emissions impact on these residents, the Project should contribute its share to the ongoing efforts of many organizations to provide supportive housing and decent work to low-income and homeless downtown residents.

The Project should help capitalize a revolving loan fund that can be used to develop permanent supportive housing units for homeless individuals and families in the downtown area. These units would be operated by existing downtown organizations with demonstrated success of ending homelessness for individuals through directly providing housing and/or housing placement with supportive services. Additionally, a percentage of the on-site housing affordable to extremely low-income people should be targeted for homeless people, in coordination with downtown homeless service organization that specialize in housing placement.

**f. Open Space.** The Project proposes to allocate $50 million for park space in downtown, while nearby low-income communities suffer from well-documented and significant needs for open space for children and families to use for recreation. Thus, the Project should redress this inequity by sharing revenue to support open space creation in those communities.

**REQUEST FOR NOTIFICATION** 13-34

Pursuant to California Public Resources Code Section 21092(b)(3), we request that the Authority please mail any and all public notices or information concerning the DEIR to:

Benjamin S. Beach
Staff Attorney
Community Economic Development Unit
Legal Aid Foundation of Los Angeles
8601 S. Broadway
Los Angeles, CA 90003
Phone: 213-640-3968
Fax: 213-640-3988

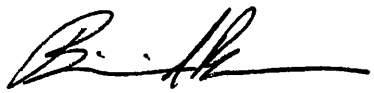
13-34

**CONCLUSION**

In conclusion, we request that the Authority include in the administrative record for the Project these comments and the exhibits attached hereto. We also request, and CEQA requires, that the Authority consider these comments and prepare a written "good faith reasoned analysis" in response to our comments. CEQA Guidelines §15088(b). This analysis cannot include conclusory statements unsupported by facts. *Ibid.* Thank you for considering and responding to our comments.

13-35

Respectfully submitted,



Benjamin S. Beach
Staff Attorney

**LETTER NO. 13**

Legal Aid Foundation of Los Angeles
8601 S. Broadway
Los Angeles, CA 90003

**RESPONSE NO. 13-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Grand Avenue Coalition for Community Benefits which you define to include the following organizations: Strategic Actions for a Just Economy (SAJE), Coalition LA, Esperanza Community Housing Corporation, the Los Angeles Community Action Network (LACAN), the Community Development Technologies Center, Los Angeles Metropolitan Churches, Concerned Citizens of South Central Los Angeles, and Painters and Allied Trades District Council #36. The comment characterizes these organizations as representing low-income and working class people who live and work in downtown Los Angeles and expresses the opinion that the Project has a "tremendous potential to benefit the local community" and also a "great risk of serious adverse impacts to local residents and the environment." As the Draft EIR and the responses to comments in the Final EIR indicate, for purposes of a CEQA analysis there are some significant adverse impacts on the physical environment which will occur after the implementation of feasible mitigation measures, project conditions and project design to minimize such impacts. There are also distinct benefits to residents and visitors, the City, the CRA and the County from the Project. In addition to the physical benefits of the proposed redevelopment and infill of four surface parking lots in downtown Los Angeles, the Project will require a number of community benefits as described in detail in the proposed Disposition and Development Agreement (DDA) between the Grand Avenue Authority and the Developer. The Final EIR properly discloses the environmental impacts, proposed mitigation measures and conditions, of the Project, and the lead agency and responsible agency decision makers will consider that information, which includes all of the comments and responses on the Draft EIR as they review the Project before taking action on the DDA or other implementing documents. In addition, if the lead agency decides to approve the Project, then it will need to adopt a Statement of Overriding Considerations in accordance with CEQA and the CEQA Guidelines, which will describe how the benefits of the Project outweigh the unavoidable adverse environmental effects of the Project.

**RESPONSE NO. 13-2**

The introductory comment provides a "context" for the The Legal Aid Foundation's general comments that the Draft EIR does not adequately prevent or mitigate negative environmental impacts. According to the opinions expressed in the comment, Legal Aid Foundation believes that (1) "a stronger nexus needs to be built between transportation, housing, and jobs at a level of detail that will produce meaningful results;" (2) "far greater attention must be paid to the adverse impacts on the health, social and economic conditions of the existing residents of downtown (many of whom are homeless);" (3) "a stronger relationship needs to be built between the benefits that may be derived from the Project and the underserved, under-housed, and underemployed residents of skid row and South Central Los Angeles," and (4) "efforts taken to a refined level of specificity and implementation would mitigate the Project's adverse impacts." The comment concludes its introductory section by indicating that it anticipates a "constructive dialog and negotiation process" and that a community benefits program detailed in its comments "would mitigate the Project's adverse environmental impacts."

The specific responses to specific comments are detailed below. In general, the Project is guided by a goal and supporting objectives as set out in the DEIR at Volume 1, Section II, Project Description, pages 95 through 99. As the comment suggests, the decision makers will be balancing benefits and impacts of the Project when they make their decisions. The goal of the Project contemplates an economically viable, community-oriented mixed-use development with welcoming public open space, and both the CRA and the County have agreed in the Implementation Plan to dedicate a total of $50 million in pre-paid rent for the ground leases of their property for the Project to ensure that the Civic Park will be expanded as part of the first phase of Project implementation. .

Further, although the Project decision makers have discretion to evaluate all comments about community benefits, for purposes of CEQA, and the evaluation of the Final EIR, the concept of a mitigation measure is a defined term and only deals with avoiding or minimizing significant adverse impacts of the Project on the physical environment. See specifically, for example, State CEQA Guidelines Section 15370, which defines mitigation and Section 15126.4 which provides that mitigation measures are not required for effects of the Project which are not significant and that mitigation measures are constrained as well by constitutional principles that there must be a nexus between the mitigation and a legitimate government interest as well as a proportionality between the mitigation and the impacts of the project which justify the mitigation. Further, as discussed in greater detail in Response No. 13-33, economic or social effects of a project are not considered significant effects of the project (refer to CEQA Guideline 15131) and, therefore, mitigation measures cannot be imposed under CEQA to mitigate a

project's social or economic impacts. The mitigation measures for this Project have been recommended in light of these legal constraints.

With respect to the first point in the comment summary, the Draft EIR complies with all CEQA requirements by evaluating transportation, including worker traffic, and housing and employment to the level of detail needed to support the conclusions set forth in the Draft EIR (refer, for example, to Draft EIR, Vol. 1, Section IV.B, Traffic and Circulation, pages 255, 257, 312, and 318; and Vol. 2, Section IV.E. Population, Housing, and Employment). The nexus between transportation, housing, and jobs is evaluated throughout the Draft EIR. The analysis of estimated worker trips during Project construction and employee trips during Project operation takes into account the nexus between employment and transportation, utilizing industry standard ITE trip generation rates (Draft EIR, Vol.1 Section IV.B, Traffic and Circulation). The nexus between traffic, employee trips, and air quality is evaluated in relation to the contribution of employee trips to the Project's construction and operational air emissions (Draft EIR, Vol. 2 Section IV.F, Air Quality). The Draft EIR also describes the Project's job/housing balance in relation to the jobs/rich Central City (Draft EIR, Section IV.A. Land Use and Section IV.E, Population, Housing, and Employment). CEQA does not require speculative analysis, so the Draft EIR does not provide speculative detail as to the number of trips that would be reduced as a result of jobs/housing balance or the existing geographic location of the construction worker and employment pool.

In response to item (2) in the summary, the Draft EIR is consistent with the CEQA Guidelines in identifying the health implications associated with air emissions (Draft EIR, Vol. 2, Section IV.F, pages 516, 523-524, 528- 530, 532, 537, 541, and 547). As stated in the Draft EIR, ambient air quality standards are set by the California Air Resources Board at levels that provide a margin of safety and protect the health of the most sensitive individuals in the population (Table 54, Footnote a, page 516). Therefore, any of the activities of the Project causing air quality standards to be exceeded would generate a potential health risk to individuals in the surrounding community. The conclusions of significance are provided in the Draft EIR (Section IV.F, pages 539, 541, 543-44, 547-549, 557-559, and 566-567). The Draft EIR does not distinguish between its most and least healthy residents. For instance, the Draft EIR does not discern between the senior residents of Angelus Plaza or younger student residents at the Colburn School. Neither does the Draft EIR distinguish between these receptors and residents who may be living outdoors in the vicinity of Main Street. The Draft EIR concludes that during construction, Project development could result in a significant impact that would exceed the ambient concentration standards for certain pollutants based on the screening thresholds set by the SCAQMD. As a result, all feasible mitigation measures have been incorporated into this Final EIR in a manner consistent with all CEQA requirements. This Final EIR concludes, as was the case with the Draft EIR, that Project development, even with the incorporation of all feasible

mitigation measures, would still have a significant impact with regard to localized and regional air quality during Project construction and regional air quality during Project operation. As discussed in greater detail in the response to Comment No. 13-12, below, ambient air quality standards are established at levels that provide a reasonable margin of safety and protect the health of the most sensitive individual in the population. The localized air quality significance thresholds used in the Draft EIR were established by the South Coast Air Quality Management Districts (SCAQMD) such that if the thresholds are exceeded then an exceedance of an ambient air quality standard is likely.

In response to item (3), the statement that a stronger evaluation of the relationship between the benefits of the Project that would be derived from the Project and the individuals in the community, particularly the City's "underserved, underhoused, and underemployed" community, is not clear. The City's "underserved, underhoused, and underemployed" community would benefit from the renovation and expansion of Civic Mall, which would be available to all residents of the City, and from the provision of affordable housing, for which some members of this community may qualify. The identification of particular City residents who would benefit, however, is speculative and is not required to be discussed in the EIR. Therefore, no further evaluation of the Project's environmental effects in relation to this community is required.

Item (4) is a concluding statement regarding the points raised in items (1) through (3), and as such, is addressed above in the separate discussions that respond to items (1) through (3).

**RESPONSE NO. 13-3**

Under the heading of "General Comments," the comment expresses the opinion that the Draft EIR suffers generally from two basic flaws:" (1) a failure to adequately consider the Project's impact on existing residents and (2) a series of incorrect assumptions about transportation, housing and jobs and the relationship between these elements". As summarized here, and later detailed in these responses to comments, these allegations are unfounded and are not supported by the record and specific analyses in the EIR.

First, the general comment that the Draft EIR fails to adequately consider the Project's impact on existing residents is incorrect. The Draft EIR identifies sensitive receptors, including residents, to noise and air quality impacts and identifies residential uses that would be impacted by view blockage as well as the Project's land use compatibility with adjoining residential uses. The Draft EIR also presents the significant impacts of traffic, air quality, and noise. The Draft EIR identifies intersections or areas in which traffic and construction impacts would be greatest.

The Draft EIR identifies both regional and local air quality impacts as well as stationary and mobile noise impacts, and then provides mapping of surrounding sensitive receptor sites. The Draft EIR also evaluates potential hazards associated with any unknown hazardous onsite materials and with the use and transport of hazardous materials for construction and operation of the Project. The Draft EIR also evaluates the impact of the Project with respect to the delivery of public services, including fire, police, schools, parks, and libraries that would affect the local community. In addition, the Draft EIR evaluates the impact of the Project with respect to utilities and the impact of the Project with respect to the future availability of water, wastewater, and solid waste facilities to the community after Project development.

Second, the general comment that the Draft EIR includes a series of incorrect assumptions for the transportation, housing, and jobs analyses is incorrect. The assumptions for the Draft EIR's transportation analyses are consistent with standard industry practices, including the Institute of Transportation Engineers (ITE) guidelines, and were conducted under the authority and review of the LADOT. Assumptions for the housing and jobs analysis are based on procedures set forth in the Los Angeles CEQA Thresholds Guide (pages B.1-1 though B.1-5), and are consistent with industry standards in the evaluation of population, housing and employment.

These issues are addressed in greater detail in the topic-specific responses below.

**RESPONSE NO. 13-4**

The Draft EIR as requested in the comment identifies all possible significant impacts of the Project. The comments that the Project would be legally insufficient if it does not contain an analysis of energy impacts is not consistent with the direction provided in the CEQA Guidelines and relevant case law as detailed below.

In reference to the comments regarding the Draft EIR's legal sufficiency with respect to the analysis of energy impacts, the Draft and Final EIR comply with all CEQA requirements, including, but not limited to those addressing energy use. First, the comment letter cites two cases in support of the statement "the Project EIR will be legally insufficient if it does not contain an analysis of energy impacts." However, those two cases, *County Sanitation District No. 2 v. County of Kern* (2005) 127 Cal.App.4$^{th}$ 1544, and *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4$^{th}$ 398, merely stand for the proposition that substantial evidence was presented in those cases that the project at issue therein may cause a significant impact on energy resources and, therefore, the lead agencies' approval of a negative declaration (instead of an EIR) was inappropriate. In contrast, for the Grand Avenue Project, the Initial

Study prepared prior to the Draft EIR identified the Project's specific amounts of electricity and natural gas consumption and, based on those amounts, concluded that the Project's energy demands would fall within the projected energy demands for LADWP and SCGC. Accordingly, the Initial Study determined that no further analysis of this issue in the EIR was warranted. (A copy of the Initial Study was included in Appendix A to the Draft EIR.) These conclusions are supported by substantial evidence, and the legal cases cited do not apply to these facts and do not require a different conclusion.

In addition, energy is not a listed issue within the issues required to be addressed in the CEQA Guideline's Environmental Checklist (Appendix G). The CEQA Guidelines suggest that an analysis of energy demand is required only if a Project would consume energy in an "inefficient, wasteful, and unnecessary manner. The discussion of energy demand first comes up in CEQA in reference to mitigation measures, in which CEQA requires that the Draft EIR evaluate feasible mitigation measures, "where relevant, to minimize adverse impacts including, inefficient and unnecessary consumption of energy" (Section 15126.4(a)(1)). As such, the responsibility of the Draft EIR is to provide mitigation measures where it has been determined that a Project would result in the "inefficient and unnecessary consumption of energy." Under Subsection 15126.4(a)(1)(C), the Guidelines state that energy conservation measures shall be discussed, when relevant, and provides examples of energy conservation measures in Appendix F of the CEQA Guidelines. As a subsection to Section 15126.4(a)(1), uses that would be characterized by inefficient and unnecessary energy consumption are identified. Therefore, the provisions of CEQA Guidelines Appendix F are applicable only to those projects that are clearly evident to be energy inefficient or wasteful. Appendix F provides further latitude and does not require that an EIR section be dedicated to the analysis of energy demand. Appendix F contemplates and allows the EIR to present a discussion of energy consumption in a variety of ways throughout the Draft EIR.

As the Project does not propose to use energy in an inefficient or unnecessary manner, as discussed in detail below, the provisions of Appendix F are not applicable to the proposed Project. Nevertheless, the importance of energy efficiency is reflected in several places in the EIR starting with the listing of the Project's objectives. The objectives of the Project include an objective to "provide a design that emphasizes pedestrian and public transit opportunities, and that integrate linkages between pedestrian, public transit and other public roadways" and to "encourage the use of public transportation to and from the downtown through the use of appropriate bus, train, and other transit system such as the Metro Red Line Civic Center Station, and through Red Line connections to Union Station and the region by commuter train, as well as by regional bus transit and local bus transit" (Vol. 1, Section II. Project Description, page 98). Objectives of the Project are also intended to "improve the jobs/housing balance downtown" and to "implement redevelopment plan objectives to provide that the proposed residential area of the

Project be developed to provide housing, among others, for workers who seek a living environment near their places of work as well as near the available cultural, educational and entertainment facilities" (Vol. 1, Section II. Project Description, page 99). Several of the Project Objectives address energy efficiency through reduced reliance on the automobile with its resulting energy efficiencies with regard to gasoline consumption. Other objectives of the Project that also address energy efficiency include the improvement of jobs/housing balance (Draft EIR. Vol. 2, Section II, Project Description, page 99) and the encouragement of the use of public transportation to and from the downtown through the use of bus, train, and other transit systems such as the existing Metro Red Line Civic Center Station, and through Red Line connections to Union Station and the region by commuter train, as well as by regional bus transit and local bus transit" (Project Description, page 98).

The Project, by also providing housing in a range of unit size and affordability within a dense urban center, would improve the jobs/housing balance in a jobs-rich area and through its location adjacent to two Red Line subway stations, regional bus lines, and the DASH it would encourage the use of transit. A primary strategy of the Southern California Association of Governments (SCAG) for the improvement of air quality is through the reduction of vehicle miles, with resulting benefits with regard to energy consumption. The consistency of the Project with SCAG's Regional Comprehensive Plan and Guide (RCPG) pertinent to energy consumption is addressed in the Draft EIR (Vol. 1, Section IV.A, Land Use, Table 10, pages 199 through 206). As discussed in this table, the Project would be consistent with RCPG policies to encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices (Policy 3.04); to encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities (Policy 3.05); to encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk or bike (Policy 3.12); to encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and development (Policy 3.13); to support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers (Policy 3.14); to support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors (Policy 3.15); and to encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment (Policy 3.16). The full discussion of the Project's consistency with these policies is presented in Table 10 (Draft EIR, Vol. 1, beginning on page 199). The Project would particularly comply with SCAG policies for the reduction of vehicle miles traveled through the placement of housing within a jobs-rich urban center (jobs/housing balance); through infill development that would not cause the unnecessary development or

energy expenditure required for the construction of offsite infrastructure; through the encouragement of transit use in its proximity to existing transit lines; and through features that encourage pedestrian traffic.

However, the conclusion that the Project would not be an "inefficient, unnecessary, or wasteful" energy consumer is not based solely on the above references to the Draft EIR. Energy consumption is one of the sources of air emissions that are analyzed in the Project's air quality analysis. The Project's air quality analysis addresses emissions from fuel consumption by motor vehicles as well as consumption of natural gas and electricity during Project operations (Draft EIR, Vol. 2, Section IV.F, Air Quality, pages 536, & 542). The consumption of electricity by the Project was calculated according to factors provided in the SCAQMD's CEQA Air Quality Handbook, Appendix to Chapter 9 (1993). The SCAQMD recommends the URBEMIS 2002 program for the assessment of a project's emissions attributable to energy consumption from sources including natural gas consumption associated with space and water heating, landscape maintenance equipment, and consumer products, to name just a few. According to the Draft EIR (page 542), on-site facilities that would use natural gas would include chillers, boilers (used for water and space heating), and emergency generators. Calculation sheets for electricity and natural gas consumption for both the County Office Building Option and Additional Residential Development Option are provided in Appendix D-3 (Draft EIR, Vol. 3).

The Draft EIR also discusses the role of Title 24 of the California Code of Regulations, with regard to energy conservation through efficient building design. The incorporation of Title 24 requirements into the Project are presented as Regulatory Measure F-2, which states: "all residential and non-residential buildings shall, at minimum, meet the California Title 24 Energy Efficiency Standards for water heating, space heating and cooling". [1] By way of background, Title III of the Energy Conservation and Production Act (ECPA), as amended by the Energy Policy Act (EPAct) in 1992 and 2005, requires states to adopt commercial building energy efficiency requirements that meet or exceed the stringency of the ASHRAE/IESNA Standard 90.1-1999, jointly developed by the American Society of Heating and Refrigeration Engineers (ASHRAE) and the Illuminating Engineering Society of North America (IESNA). However, it does not dictate the adoption of a specific set of requirements. This drives state legislatures to adopt or develop some sort of energy code or standard to meet the EPAct ruling.

[1] *In addition to Regulatory Measure F-2, Mitigation Measure F-14 is incorporated into the Draft EIR as one of several feasible mitigation measures intended to reduce stationary-source emissions (Draft EIR, page 564), which would also provide for a reduction in energy demand.*

A few states, such as California, Florida, Oregon, and Washington, have developed their own energy codes, but most choose to adopt a nationally available code or standard such as ASHRAE 90.1 or the International Energy Conservation Code (IECC) developed by the International Code Council. Even though faced with this federal mandate, several states have yet to adopt a code, and others have one on the books that is not quite up to the required level of stringency.

According to the US Department of Energy, California's state-developed residential energy code, Part 6 of Title 24, exceeds 2003 IECC and is mandatory statewide as of October 1, 2005 and the state-developed commercial energy code, Part 6 of Title 24, which meets or exceeds ASHRAE/IESNA 90.1-2001, is mandatory statewide as of October 1, 2005.

Amended Title 24 (2005 Title 24) of the State Building Code is incorporated into the City Building Codes and has been enforced since October 2005. Title 24 (2005) applies to all new development and establishes standards for heating and cooling efficiency of a building envelope, mechanical systems, indoor and outdoor lighting, signs, residential HVAC and residential water heating. The 2005 updates to Title 24 amended prior performance standards to mandate an additional energy usage reduction of 15 percent. New Title 24 regulations require non-residential buildings to comply with basic building commissioning (testing) for HVAC and lighting equipment controls, demand control ventilation (sensors that vary ventilation depending on $CO_2$ levels in spaces with varying occupancy like conference rooms, dining rooms, lounges, gyms), insulation at the roof or on hard ceilings (insulate on t-bar ceilings is not allowed), installation of R-8 level duct insulation, and lower power limits on lighting to encourage new efficient equipment. Title 24 energy saving measures also apply to non-residential outdoor lighting, and include lighting power limits, shielding, and bi-level controls to be reduced to half level when not needed. For residential buildings, Title 24 requires high efficacy (e.g., fluorescent) in all permanent lighting or controls; high efficacy lighting in kitchens, high efficacy or motion sensors in bathrooms, utility rooms, garages, laundry rooms, and high efficacy or combined photosensor/motion sensor for exterior lights. Residential exterior lights must also be high efficacy or provide a dimmer and can lights must be airtight. High-efficacy or motion sensor/photocontrol is required for outdoor fixtures attached to buildings. With respect to signs, Title 24 requires lighting power limits or efficient lighting sources, indoors and outdoors. Title 24 is structured so the builder can choose from a list of specific measures that are identified as "prescriptive" building measures, or design its building to meet performance based standards articulated in Title 24 governing energy consumption. The revised Title 24 would reduce heat transfer and urban "heat islands." The Project would comply with all requirements of Title 24 applicable to the Project's residential and non-residential Project components. Given the enforcement of the current version of Title 24, which would reduce energy demand by approximately 15 percent compared to former Title 24 requirements, and the other reasons

discussed in the Initial Study and these Responses to Comments, Project impacts with respect to energy demand are not potentially significant. Therefore, the Project would not be an "inefficient, unnecessary or wasteful" energy consumer. As a result, the analysis of energy consumption beyond that provided in the Draft EIR is not required.

Section VI of the Draft EIR also discusses energy use as a potential significant irreversible change that could occur with Project development, in accordance with CEQA Guidelines Section 15126.2(c). As described in the Draft EIR (Vol. 2, Section VI, Other Environmental Considerations, page 858), construction of the Project would require the use of nonrenewable resources, such as wood, the raw materials in steel, metals such as copper and lead, aggregate materials used in concrete and asphalt such as sand and stone, water, petrochemical construction materials such as plastic, and petroleum based construction materials. The Draft EIR also states that fossil fuels used to power construction vehicles would also be consumed. According to the Draft EIR, operation of the Project would involve the ongoing consumption of nonrenewable resources, such as electricity, petroleum-based fuels, fossil fuels, and water, which are commonly consumed in the existing surrounding urban environment. The Draft EIR also states that energy resources would be used for heating and cooling of buildings, lighting, and transporting of patrons to and from the Project site and that the use of such resources would continue to represent a long-term commitment of essentially nonrenewable resources. This analysis also states that operation of the Project would occur in accordance with Title 24, which sets forth conservation practices that would limit the amount of energy consumed by the Project. Although the Project would consume energy in the form of natural gas, electricity, and petroleum, with the implementation of Title 24 and the other measures and aspects of the Project discussed above, the Project would not result in an inefficient, wasteful, or unnecessary use of energy. Therefore, mitigation measures, with the explicit intent to reduce energy demand in cases of inefficient, wasteful or unnecessary use of energy would not be required.

Comments regarding the shortfall in the State's energy reserves in July 2006 are not applicable to the Project as within the City of Los Angeles, energy is owned and generated by the City's Department of Water and Power (LADWP). As such, the LADWP is not strictly controlled by market forces or reliant on regional reserves. With regard to the comments on the large scale of the Project, the Project would not exceed regional growth expectations or LADWP's projected demands.[2] In fact as an infill development, the Project would reduce energy demand compared to a development of similar scale in an outlying area. In reference to the

[2] *Los Angeles Department of Water and Power, Draft 2006 Integrated Resource Plan, Section 4.0 (Key Assumptions, Load Forecast, & System Reserve Margin)(May 2, 2006),*

comments regarding the "urban heat island effects" of projects that do not contain energy efficient materials or trees, the Project would contribute to reducing the heat island effect by landscaping added as part of all Project components. Landscaping would be added on each of the five development parcels and the Grand Avenue Streetscape Program, and it is also anticipated that the level of landscaping would be increased over existing levels with the creation of the proposed Civic Park. In addition, development within the five parcels would also comply with the most recent requirements of Title 24, which would result in notable energy savings.

This comment also invites the Project to review the Project using LEED criteria and to pursue LEED certification as a way of "moving in the direction of City policy". LEED stands for the Leadership in Energy and Environmental Design Green Building Rating system ™ which was developed by the U.S. Green Building Council, or USGBC, an organization representing the nationwide building industry. LEED is a voluntary rating system created to define "green buildings" and to define a common standard of measurement, promotion of whole-building design practices, and recognition of environmental leadership in the building industry, as well as to impact the building market. See USGBC website at www.usgbc.org,

Although the City, which is a responsible agency under CEQA for this Project requires LEED certification for City developed new public works buildings of more than 7500 square feet, that requirement does not apply to this Project. The Authority did not require LEED certification in its competitive call for a private developer to propose a mixed use project for the four public parcels in downtown Los Angeles now used as surface parking lots. Neither the County nor the CRA/LA nor the City of Los Angeles require private project applicants to use the LEED system .

A project can, as in this case, analyze the project's impacts on the environment for purposes of CEQA without a requirement for LEEDS certification. There is no direct correlation between LEED certification and compliance with a stringent building code such as Title 24 of the California Building Code . A number of the categories of analysis covered by the LEED NC version 2.2 rating system for new construction are covered in the design of this Project and analyzed in the Draft EIR. For example, the credits in the "new construction "category (LEED-NC Version 2.2 Registered Project checklist) are earned in the following categories: Sustainable Sites, Water Efficiency, Energy & Atmosphere, Materials and Resources, Indoor Environmental Quality, and Innovation and Design. These areas , with the exception of those dependent on final building design plans, are addressed in the Project, its design and analysis for CEQA purposes and in design guidelines for the Project. As the Project's final building designs have not been developed as of this date, a commitment to specific LEED building design measures would be premature and thus, the discussion of specific energy design features would be speculative.

No further analysis of this issue in the Final EIR is required. Your comment that the Project be requested to seek Platinum certification from the LEED rating system will be provided to the decision makers before action on the Project.

**RESPONSE NO. 13-5**

The comment expresses the opinion that the Project would exacerbate "already low levels of service at a number of key intersections in and around the Project site." However, as discussed in the Draft EIR, these intersections would be operating at predominantly high (good) levels of service. As identified in the Traffic analysis (Vol. 1, Section IV.B, Traffic and Circulation, Table 16, pages 259-260, and Figure 3-4 in Appendix B), of twelve intersections adjacent to or within one block of the Project, under the Future Without Project Conditions, only three intersections would operate at worse than level of service (LOS) C in the A.M. peak hour and only four intersections would operate at worse than LOS C in the P.M. peak hour.

With respect to the significant impacts caused by the Project, the comment is correct in reference to the number of impacts. However, the comment that in "all but two of these intersections (in and around the Project area) the resultant level of service would be rated at D (fair), E (poor) or F (gridlocked)" has generalized the discussion of levels of service in a way that could be misleading. In the traffic analysis (Vol. I, Section IV.B, Traffic and Circulation, pages 265-271), the Draft EIR concludes that, of the seven significant impacts in the A.M. peak hour, three intersections would continue to operate at LOS D or better and four intersections would operate at LOS E (three of which would operate at LOS E without the Project). Of the seventeen significant impacts in the P.M. peak hour, ten intersections (the majority) would continue to operate at LOS D or better, four would operate at LOS E (two of which would operate at LOS E without the Project), and three would operate at LOS F (of which two would operate at LOS E without the Project and one that would operate at LOS F without the Project).

With respect to conditions after mitigation, the Draft EIR traffic analysis (Vol., Section IV.B, Traffic and Circulation, pages 322-326) concludes that the Project with County Office Building Option, would cause one significant impact in the A.M. peak period, where the resultant level of service would be LOS D; and that of the thirteen remaining significant impacts in the P.M. peak hour, nine intersections (the vast majority) would operate at LOS D or better. Two of the nine intersections would operate at LOS E and two would operate at LOS F. The comment fails to mention that the Draft EIR traffic analysis also concludes (Vol. 1, Section IV.B, Traffic and Circulation, page 328) that the Project with Additional Residential Development Option would cause fewer remaining significant traffic impacts. No remaining significant traffic impacts would occur in the A.M. peak hour and, of seven remaining significant

traffic impacts in the P.M. peak hour, six intersections would operate at LOS or better, and one intersection would operate at LOS F.

Based on further discussions with the City of Los Angeles' Department of Transportation (LADOT), it has been determined that a physical roadway improvement is feasible at the intersection of Hill Street and Third Street. This intersection is located at the east entrance to the Third Street Tunnel under Bunker Hill, a two-lane one-way westbound tunnel. The proposed improvement would be a restriping of the westbound approach on Third Street, within the existing roadway width, from the existing configuration of one left turn lane, one through lane, and one shared through/right-turn lane to a future configuration of one left turn lane, two through lanes, and one exclusive right-turn lane. The implementation of this measure would also require a slight widening of Third Street west of Hill Street before the entrance to the tunnel within the public right-of-way. With this measure (in combination with the other mitigation measures), the P.M. peak volume/capacity ratio at the Hill Street and Third Street intersection for the Project with County Office Building Option would be reduced from 1.103 (LOS F) to 1.007 (LOS F). This improvement in roadway operating conditions would fully mitigate the Project's impact at this particular intersection. The impacts at this intersection for the A.M. peak hour and for both peak hours under the Project with Additional Residential Development Option are less than significant without this measure.

With the implementation of this additional mitigation measure, the number of significant unavoidable impacts in the P.M. peak hour for the Project with County Office Building Option would be reduced from the 13 locations identified in the Draft EIR to 12 locations. Therefore, and on an overall basis, there would still be one significant unavoidable impact in the A.M. peak hour and 12 significant unavoidable impacts in the P.M. peak hour, which are summarized as follows:

A.M. Peak Hour

- Broadway / First Street (LOS D)

P.M. Peak Hour

- Olive Street / First Street (LOS C)
- Olive Street / Fourth Street (LOS C)
- Hope Street / First Street (LOS D)

- Hope Street / GTK Way /Second Place (LOS D)
- Grand Avenue / Temple Street (LOS D)
- Grand Avenue / First Street (LOS D)
- Olive Street / Fifth Street (LOS D)
- Hill Street / Second Street (LOS D)
- Hill Street / Fourth Street (LOS D)
- Hope Street / Temple St. (US-101 Ramps)(LOS E)
- Broadway / First Street (LOS E)
- Grand Avenue / US-101 / I-110 Ramps (LOS F)

As can be seen from the above list, all of the identified intersections would continue to operate at LOS D or better, except for two which would operate at LOS E in the P.M. peak hour (Hope Street / Temple St. / US-101 Ramps, and Broadway / First Street), and one which would operate at LOS F in the P.M. peak hour (Grand Avenue / US-101 / I-110 Ramps). These corrections are presented in Section IV, Corrections and Additions of this Final EIR.

**RESPONSE NO. 13-6**

The comment expresses the opinion that the commuting times of the estimated numbers of onsite construction workers is not adequately explained. With respect to the number of workers onsite, the Draft EIR traffic analysis (Vol. 1, Section IV.B, Traffic and Circulation, page 255) states that 250 workers would be typically expected to be on-site, although the number of workers could peak at about 600 workers at certain times.

The Draft EIR traffic analysis is based on the construction industry standard of a 7:00 A.M. to 3:30 P.M. work shift, and the fact that many projects in the Los Angeles area, in fact, work a 6:00 A.M. to 2:30 P.M. shift. Work shifts start early in the morning to both avoid the normal peak traffic, to begin work in the cooler morning hours, and to maximize work hours within the timeframe allowed by the City Code (7:00 A.M. to 9:00 P.M.). Note that the developer has voluntarily agreed to restrict the hours of certain construction work so exterior construction utilizing heavy equipment would end at 8 p.m. Further, the Project developer has agreed to a condition of Project approval that would establish the 7:00 A.M. to 3:30 P.M. shift as the standard shift for the majority of construction workers for the Project. For these reasons, among others,

allowing Project construction to 8:00 P.M., as analyzed in the Draft EIR, is maintained, as it is likely that a second shift, or overtime shift would be required to meet the schedule, but with a smaller work crew than the normal shift. Workers will, therefore, arrive before the morning peak hour of traffic and depart before the evening peak hour of traffic, and will not arrive or depart during peak hours. In addition, using the standard shift allows the Project to work a second shift, or overtime shift, by working until the end of the time allowed by the City Code. Such a shift may be utilized, at times, to meet the overall Project schedule and shorten the construction period, but with a smaller work crew than the normal shift. As with the first shift, the travel would be in off peak hours since they would be arriving in the early afternoon and leaving in the late evening. Therefore, as stated in the Draft EIR traffic analysis (Vol. 1, Section IV.B, Traffic and Circulation, page 255), no significant peak hour impacts would occur. No further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-7**

The comment expresses the opinion that trip generation assumptions in the Draft EIR traffic analysis may not be realized. The first paragraph of the comment accurately references the summary discussion on page 232 of the Draft EIR, except that the overall reduction applied for office trips was 43 percent, and not 45 percent, as stated in the comment.

With respect to the second paragraph of the comment, the analysis presented in the EIR is not "argument, speculation, or unsubstantiated opinion or narrative, or evidence which is clearly erroneous or inaccurate," as stated in the comment. In fact the Draft EIR very carefully and comprehensively documents in detail (Vol. 1, Section IV.B, Traffic and Circulation, pages 229-232, and Appendix B pages 61-66) the need for adjustments to the standard ITE trip rates, the actual adjustments made, and the rationale and sources for making those adjustments. The methodology, and resultant trip rates, were approved by LADOT for this specific Project prior to the study commencing, and are consistent with studies of similar large development projects previously approved in downtown Los Angeles (as stated in the Draft EIR traffic analysis).

As identified in the Draft EIR, "the typical methodology of estimating trip generation using trip rates from Institute of Transportation Engineers (ITE) data[3] does not adequately reflect the characteristics of the proposed Project and the downtown environment in which it is located, since ITE trip rates are derived from data typically collected from stand-alone (single use) suburban sites" (Vol. 1, Section IV.B, Traffic and Circulation, page 229).

[3] *Institute of Transportation Engineers, 7th Edition Trip Generation Manual, Washington D.C., 2003*

The Draft EIR traffic analysis also states the adjustments that were made to these standard trip rates reflect not only higher transit use but also a number of other factors, as follows:

"Trips Internal to the Project: With a project as large as the proposed Project, some trips will both start and end within the Project itself – and thus will be walking trips not requiring use of a car. These will include people who live in the Project making a trip to the retail, restaurant, and/or other commercial uses and the health club, or even to the office building if they both live and work in the Project. It will include office workers who visit the commercial uses in the Project. It will also include people who drive to the Project, but visit multiple destinations within the Project (for example retail and restaurant, or restaurant and health club). Because these people walk between those multiple destinations they will make only one vehicle trip rather than driving to each destination[4].

"Trip Interaction with Adjacent Uses in the Downtown: The Project site is located in the heart of downtown, adjacent to or near many other uses including office buildings, entertainment uses, and residential towers. Some of the visitors to the Project commercial uses will come from these uses and thus will walk to the Project rather than drive, for example office workers or nearby downtown residents visiting the retail or restaurant uses and the health club. Similarly some visitors will be already visiting the Walt Disney Concert Hall and/or the Music Center, and will park there, and then walk across to the Project to eat at a restaurant or to shop before the show. In addition, some people who live in the Project, will make trips to other adjacent or nearby downtown uses (such as to work in office buildings or to restaurants), and will walk rather than drive a car.[5] The ability to make trips to other local destinations in the downtown without using a car will be a major appeal to those choosing to live in the Project and have an urban downtown lifestyle."

"Trips Using Transit: As previously identified, the Project site is served by very significant levels of transit service, including both rail and bus transit. The Metro Red Line station with two portals on the Project site (on Parcel W-2 at Hill Street & 1st Street, and at the

[4] Experience and research shows that dense concentrations of land use mixes results in substantial interaction between uses, For example, a study of major suburban activity centers (NCHRP Report 323, *Travel Characteristics at Large-Scale Suburban Activity Centers*, Washington D.C., 1989) indicates various such trip-making characteristics, including: that 30 percent of residents in major activity centers also work there; that 10 percent to 15 percent of office trips make at least one stop on the way to/from work; that 15 percent to 30 percent of retail trips are internal to the activity center; and that 19 percent to 27 percent of hotel trips remain internal to the center. As these data are for suburban centers, the numbers would be expected to be higher in the denser and transit rich environments of downtowns.

[5] *See note 2, above.*

Court of Flags on the Civic Mall) provides direct access to the entire rail system in the metropolitan Los Angeles area, and 58 bus lines provided by eight transit operators serve the area of the Project site. In addition the LADOT DASH service provides shuttle bus service around downtown. The Downtown Los Angeles Cordon Count[6], conducted by LADOT in 2002, shows that transit use into and out of the downtown core including the Bunker Hill area is very high with about 41percent of all peak period trips into/out of the entire downtown area occurring on transit and as rideshare passengers (32 percent on transit and 9 percent as rideshare). This data relates to all uses in the downtown but is heavily oriented to work-related trips because of the large number of jobs downtown[7]. The data in the Downtown Los Angeles Cordon Count show that the 2002 counts reflect a higher percentage using transit than in 1990 – largely due to the addition of rail transit to downtown Los Angeles (with 25 percent of all transit trips using rail).

"Pass-By Trips: The majority of trips to and from the Project would continue to be by automobile, even accounting for the types of adjustments identified above, and significant levels of transit and walk trips. However, pass-by trips also account for an adjustment of total trips, since some of the Project's vehicle trips may already be passing by the site as existing trips on adjacent roadways. Although pass-by trips would add trips to the Project driveways by stopping at the Project site, they would not add additional traffic to the street system. Pass-by trip reductions are based on standard LADOT adjustment factors by type of use" (Vol. 1, Section IV.B, Traffic and Circulation, pages 229-232).

Trip adjustments were based on a variety of sources as noted in the Draft EIR traffic analysis, and in the text and footnotes in the preceding discussion, including actual observations in downtown Los Angeles ("City of Los Angeles Downtown Cordon Count," May 2002, and the research documented in The Los Angeles Downtown Center Business Improvement District, "Live, Work & Play Downtown L.A.," 2005). The adjustments made were conservatively low in that they were invariably and consistently less than, or at/towards the lower end of the ranges documented in these reference sources.

As discussed in the Draft EIR traffic analysis and as further shown in the Appendix B Tables A-1 thru A-6 (Draft EIR, Vol. 3), the adjustments were not only made for higher transit

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[6] *City of Los Angeles,* Downtown Cordon Count, *May 2002*

[7] *A recent survey of residents in Downtown Los Angeles (The Los Angeles Downtown Center Business Improvement District, Live, Work & Play Downtown L.A., 2005) identified that about 17 percent of downtown residents walk or bike to work and school; that about 9 percent take transit to work and school; and that 46 percent of residents also work at downtown locations.*

use and lower car ownership, but also for the proximity of the Project to other nearby uses in the downtown that can be reached by walking, for the fact that the size and mixed use nature of the Project means that some trips will stay internal to the Project, and that some trips will already be passing by the site and therefore will not be new trips.

The comment expresses the opinion that anticipated adjustments to trip generation may not be realized and suggests that the DEIR assumption that residents of the Project will use cars at a lower rate is just speculation. That is not the case. Adjustments made in the Draft EIR traffic analysis for transit use by residents were, in fact, conservatively small, often no more than 5 percent of trips for most land uses. The comment states that one could also "speculate" that project residents will be more likely to use cars than transit. The DEIR in fact states this to be the case. Only 5 percent of the trips to/from the condominiums were assumed to be on transit (Draft EIR Appendix B, Tables A-1 thru A-6). A higher reduction was made for the affordable apartment residents, based on anticipated lower income levels and, thus, lower car-ownership.

In summary, the trip generation analysis in the Draft EIR is substantial, comprehensive, reasonable and follows a methodology specifically approved by LADOT, and backed up by considerable supporting evidence including sources specific to downtown Los Angeles. Therefore, contrary to the view expressed in the comment, the basis for the mitigation analysis is also sound, and no further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-8**

The comment expresses the opinion that the Project's design does not conform to urban development patterns that support non-automobile travel. The characteristics that the comment mentions ("narrow streets with short blocks and all storefronts and buildings abutting the sidewalk, a plethora of diverse, small and medium businesses, a predominantly low-to middle income demographic profile, a lack of off-street parking, etc.") do not necessarily, in of themselves, give rise to high rates of non-auto travel, and the comment provides no evidence to support the contention. Nor are these urban features the only characteristics that give rise to high rates of non-auto travel.

Key factors that do give rise to high rates of non-auto travel (as identified in the Draft EIR traffic analysis (Vol. 1, Section IV.B, Traffic and Circulation, pages 229-232), particularly in downtown locations, are proximity to substantial levels of transit service, proximity to nearby land uses and destinations within walking distance, and proximity of multiple uses within a single large development, whereby, trip destinations can be satisfied internally without leaving the Project. All these conditions clearly exist for the Proposed Project in its downtown location

as identified in the Draft EIR Traffic Analysis (Vol. 1, Section IV.B, Traffic and Circulation pages 229-232) and the metrics to support anticipated reductions in automobile trips by users of the Project, because these reasons are clearly identified in the Draft EIR Traffic Analysis (Proposed Project in its downtown location as identified in the Draft EIR Traffic Analysis (Vol. 1, Section IV.B, Traffic and Circulation, pages 229-232). Assumptions for trip reductions are also articulated in the response to Comment No. 13-7

**RESPONSE NO. 13-9**

The comment expresses the opinion that the DEIR "incorrectly states that the jobs/housing ratio is reduced" and " the jobs/housing ratio may actually be increased" . The comment is not supported.

As background, a jobs/housing ratio is a statistic that urban planners use as a way of measuring the relationship between the number of jobs and housing within an area. It is recognized that if jobs and housing are located in the same general area that there is a greater likelihood that people would work and live in proximity to another, thereby resulting in a reduction in traffic congestion, with resulting improvements in air quality and noise, when compared to traditional commuting patterns where the residence and job location are separated by great distances. The benefits of jobs/housing balance have been recognized by regional planning agencies such as the Southern California Association of governments (SCAG) as well as the City and County of Los Angeles.

A jobs/housing ratio is calculated by dividing the number of jobs by the number of housing units for a geographic area. The geographic area can be as small as an individual development site or as large as the entire southern California region or anything in between. The jobs/housing ratio is an important statistic that indicates how "balanced" an area is relative to the amount of jobs and housing within the same geographic area. The regional jobs/housing ratio in 2006 was forecasted in the Draft EIR to be 1.27 (see page 497 of Volume II of the Draft EIR). Areas which have jobs/housing ratios that are greater than 1.27 are considered to be jobs-rich, whereas areas which have jobs/housing ratios that are less than 1.27 are considered to be housing-rich. As a result, increasing housing within areas that are jobs-rich are concluded to have a positive impact on the area's jobs/housing balance, as it brings the area into a more balanced condition. As confirmed in the Draft EIR, the downtown area is a jobs-rich area.

Based on that methodology, the Draft EIR correctly concluded that the Project would incrementally balance the jobs/housing ratio in the downtown area, since it reduces the ratio of employee per resident. The Project also would incrementally balance the cumulative

jobs/housing ratio created with the implementation of the related projects, since the Project would result in a higher proportion of residential uses than if the related projects were developed without the Project. While the Project would increase population in relation to existing Community Plan projections, this increase, in itself, would not create an imbalance in terms of jobs/housing balance.

The determination of significance for the Population, Housing, and Employment analysis, is based on the Project's consistency with the established significance thresholds for that issue (Draft EIR, Vol. 2, Section IV.E, Population, Housing and Employment, page 499). The first threshold addresses Project consistency with SCAG's population and housing projections. SCAG's population and employment projections are based on U.S. Census data and forecasts provided by each participating jurisdiction. SCAG then applies a statistical analysis to create a reliable estimate of growth in the area's subregions. SCAG population and employment forecasts are what SCAG and the SCAQMD use in their plans with regard to managing traffic and air quality within the southern California region, and are therefore the standard by which the significance of growth is determined. Furthermore, forecasting population and employment growth for relatively small geographic areas, such as a City of Los Angeles Community Plan area, are more speculative as it is very difficult to forecast exactly where growth is going to occur. Therefore, SCAG forecasts for the City of Los Angeles subregion are used as the threshold standard for the significance of a population and employment increase in the Draft EIR. As indicated in Table 48 (Draft EIR, page 502), the Project would represent approximately 1.7 percent of SCAG's 2006-2015 population forecasts of 176,692 for the City of Los Angeles subregion. Also, as shown in Table 48, the Project would represent approximately 1.8 percent of SCAG's 2006-2015 housing projections for the City of Los Angeles subregion. Therefore, the Project would not cause population or housing growth in the City of Los Angeles subregion to exceed SCAG's 2015 projections and, with respect to SCAG projections, the Draft EIR correctly concluded that the Project would result in a less than significant impact and that no mitigation measures would be required (Draft EIR, page 512).

The Project would increase population over the projections contained in the Central City Community Plan. However, this would not constitute a potentially significant impact, since consistency with the Community Plan, as with other plans, is based on consistency with the objectives and policies of the adopted plan (Draft EIR, page 499). The population projections in the Central City Community Plan area are forecasts, and are not Community Plan policies or objectives. In order to address the trend in which downtown Los Angeles was increasingly jobs rich in relation to housing, a primary objective of the Central City Community Plan is to increase the range of housing choices available to Downtown employees and residents (Objective 1-2). Since the Project would provide up to 2,060 residential units (under the County Office Building Option) or up to 2,660 residential units (under the Additional Residential Development Option),

20 percent of which would be affordable, it would strongly support Objective 1-2 of the Central City Community Plan and, as such would be consistent with Community Plan policies.

In addition, the Project would strongly support the policies of the General Plan Housing Element and the General Plan Framework Element. As discussed in Table 49 (Draft EIR, page 503), the Project would support the policies of the Housing Element to encourage and plan for high intensity residential development in centers and along transit corridors (Policy 2.3.1). The Project would also strongly support the policies of the General Plan Framework which provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center (Objective 3.11) (Draft EIR, Vol. 1, Section IV.A, Land Use, Table 5, page 175). Therefore, with respect to the Central City Community Plan, the General Plan Housing Element, and the General Plan Framework, the Draft EIR correctly concludes that the Project would support existing policies and objectives and, as such, would result in a less than significant impact (Draft EIR, page 512). As a result, no further analysis of this issue in the Final EIR is required nor is there an obligation under CEQA to establish mitigation measures with regard to the issues addressed in this comment.

**RESPONSE NO. 13-10**

The comment expresses the opinion that the City General Plan's "standard" for affordable housing in new development will not be achieved unless projects like this one contribute to affordable housing. The Grand Avenue Authority, in the competitive procurement which led to the Developer's proposal, required any developer of these properties to propose at least 20 percent of residential housing be affordable as defined by the CRA.

The comment incorrectly states that the Housing Element of the City's General Plan states that 47 percent of all new housing should be affordable, when in fact it does not contain a policy or objective identifying that 47 percent of all new housing should be affordable. This percentage is primarily based on growth projections that state that Low and Very Low income housing should comprise approximately 47 percent and Moderate and High income housing should comprise approximately 53 percent of the City's housing stock. In reference to State law (Section 65915 et seq. of the California Government Code), the shortage in affordable housing is addressed though requiring local jurisdictions to implement density bonuses based on incentives or concessions. Neither the State nor the General Plan Housing Element requires the construction of 47 percent affordable housing.

The Draft EIR correctly reflects a 20 percent commitment by the developer in the mix of residential units in both versions of the project description, the project with a County office building and the project with additional residential units instead of a County office building. These units are currently proposed to be subsidized by a combination of affordable housing funds from the CRA/LA and by the Developer. Thus, the Project has from the beginning incorporated affordable housing in an integrated manner in the residential development plans. The issues of traffic, transportation, and air quality mitigation raised in this comment are addressed in specific responses below.

**RESPONSE NO. 13-11**

The comment expresses the opinion that additional air quality mitigation measures are needed since air emissions during construction and operation would be significant even with proposed mitigation measures and states that " much more could be done" to mitigate air quality impacts. These comments are addressed in detail below.

The Draft EIR analyzes criteria pollutants and toxic air contaminants (TACs). Criteria pollutants are those pollutants for which an ambient air quality standard has been established, whereas all other air pollutants are classified as TACs. The air quality analysis in the Draft EIR was undertaken for both daily conditions and conditions over the course of the Project's entire construction period. As identified in the Draft EIR, it is correct that the localized emissions associated with the Project's daily construction activities would exceed threshold standards for $NO_X$, CO and VOC (i.e., criteria pollutants) after implementation of all feasible mitigation measures (Draft EIR, Vol. 2, Section IV.F, Air Quality page 566). This analysis is based on a conservative estimate of overlapping and accelerated construction schedules (Draft EIR, Vol. 2, Section IV.F, Air Quality, pages 538-539). Actual daily construction emissions have the potential to be lower under the Project's anticipated construction schedule, since Project construction would be spread out over a longer time period, as discussed in the Draft EIR (Vol. 2, page 538). Construction emissions generated under the Project's anticipated construction schedule, in which construction of the parcels would occur one parcel at a time, are presented in Appendix D-1 (Draft EIR, Volume 3). As shown in Appendix D-1, all regional emissions would be incrementally less under the anticipated construction schedule and that regional CO (carbon monoxide) emissions would be reduced to a sufficient extent so as to result in a less than significant impact. Conclusions regarding all other impacts are the same under both of the analyzed construction scenarios. In recognition of the significant impacts identified in the Draft EIR, all feasible air quality mitigation measures to reduce construction emissions, including two new measures as set forth in Response Nos. 13-26 and 13-27, are recommended for implementation.

In recognition of the potential health effects associated with the use of off-road heavy duty diesel vehicles used in construction, the Draft EIR analyzes construction vehicle diesel exhaust (primarily diesel particulate emissions associated with on-site heavy equipment and haul trucks) and the associated health risks over the Project's entire construction period. The results of this analysis yields a maximum offsite individual cancer risk of less than one in a million at the Colburn School of Performing Arts (exterior), the nearest receptor site to Project construction activities and concluded that emissions of toxic air contaminants (TACs), including, but not limited to diesel exhaust, would not individually or cumulatively exceed the maximum individual cancer risk of ten in one million. As such, TAC emissions of diesel particulates emitted over the course of the Project's entire construction period are concluded to be less than significant (Draft EIR, Vol. 2, Section IV.F, Air Quality, page 541). Since thresholds are set at levels that provide a reasonable margin of safety and protect the health of the most sensitive individual in the population, diesel emissions emitted over the course of the Project's entire construction period are concluded to be less than significant (Draft EIR, Vol. 2, page 541) and, therefore, would not be "dangerous," as stated in the comment. The Draft EIR also addressed the cumulative impact of toxic air contaminants and concluded that the Project's contribution to cancer risk from construction activities would be less than significant and is a localized impact. Related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. Also, any related project that has the potential to emit notable quantities of TACs would be regulated by the SCAQMD rules and regulations (e.g., SCAQMD Rule 1401, New Source Review of Toxic Air Contaminants) such that TAC emissions would be negligible and, therefore, TAC emissions from the related projects are anticipated to be less than significant unto themselves, as well as cumulatively in conjunction with the Project (Draft EIR, Vol. 2, Section IV.F, Air Quality, page 556).

The comment re-states the conclusions of the Draft EIR that the Project would also exceed regional emission standards during Project operation (Draft EIR, Vol. 2, Section IV.F, Air Quality page 566). The Draft EIR analyzes emissions at both a regional and local level (Draft EIR, Vol.2, pages 522 and 524, respectively), as discussed further in Response No. 13-12, below. Regional emissions are those that occur throughout the South Coast Basin, whereas local emissions are those that occur in the vicinity of the Project site. During Project operation, localized emissions would be less than significant, while regional emissions associated with Project operations would be significant (Draft EIR, Vol. 2, Section IV.F, Air Quality). Furthermore, as with, construction emissions, all feasible air quality mitigation measures to reduce the Project's operational emissions have been recommended for implementation (refer to Section III, Mitigation Monitoring and Reporting Program and Section IV, Additions and Corrections, Subsection IV.F, Air Quality, of this Final EIR).

**RESPONSE NO. 13-12**

The comment expresses the opinion that the Draft EIR inadequately addresses the Project's air quality impacts on downtown residents and the City's homeless population. In fact, as explained below, the air quality analysis in the Draft EIR used conservative assumptions, followed all SCAQMD protocols, and did not discriminate against or exclude any particular group of sensitive receptors from that air quality impact analysis that should have been included. The commentator's assertion that the air quality analysis excluded the downtown homeless population may be based on a misunderstanding of Figure 43 and its relationship to the air quality analysis. Sensitive receptors for air quality impacts include any residential area or locations where children, the elderly, the acutely and chronically ill would possibly reside or congregate (Draft EIR, pages 518 and 529). Figure 43 (Draft EIR, page 530) identifies sensitive receptor sites that would be subject to Project-related local emissions impacts and those that would be subject to cumulative local emissions impacts. The cumulative sensitive receptor sites extend to residential uses that reach to both sides of Main Street, between Second and Sixth Streets, which area would encompass that portion of the skid row area that would be nearest to the Project. Figure 43, however, does not call out any particular group of homeless persons given the mobile and dispersed nature of that sector of our population. The information in Figure 43 was provided solely to provide information about the existing environmental setting. Whether any group of persons was identified in Figure 43 as sensitive receptors was not determinative of the significance of the Project's impact on air quality for the reasons described below.

For example, the localized effects of the Project's emissions during construction and operation are evaluated in the Draft EIR (Vol. 2, Section IV.F, Air Quality, pages 524 – 529, 539 – 541, 543 – 548, and 555 – 559). Localized impacts, which differ from regional impacts in that the latter are dispersed throughout the Los Angeles Basin, include the evaluation of CO and the evaluation of toxic air contaminants (TACs) in accordance with SCAQMD requirements. Local emissions are those that would have the greatest effect to the surrounding community and local sensitive receptor sites. The Draft EIR's analysis of localized air quality impacts is based on SCAQMD modeling protocols that use mass emissions as one of the bases for analysis. The Draft EIR's conservative estimate of maximum on-site daily emissions for CO, $NO_X$, and $PM_{10}$ was compiled for each of the individual construction site locations and compared to the applicable screening threshold. Individual construction projects that are expected to occur simultaneously and are adjacent to one another were considered collectively as well as individually. SCAQMD's screening thresholds are set so that emissions that are below the threshold would not pose any significant risk to the health of even the most sensitive receptor groups (which would include any residential population of any type), or in other words not exceed an ambient air quality standard which have been established to provide a reasonable

margin of safety and "protect the health of the most sensitive individual in the population" (Table 54, Footnote A, page 516). The air quality analysis in the Draft EIR concluded that localized CO emissions would not exceed the applicable threshold for any of the construction phases and, therefore, no significant impact attributable to CO emissions would occur. In contrast, the Draft EIR determined that localized $NO_X$ and $PM_{10}$ emissions would exceed their applicable SCQAMD screening thresholds and, therefore, the Draft EIR concluded that localized $PM_{10}$ and $NO_2$ impacts during short-term construction activities would be significant (Draft EIR, page 541). It is important to note that this conclusion was not limited to any particular group of sensitive receptors, but was conservatively assumed to apply to the entire surrounding community.

For projects like the proposed Grand Avenue Project, the SCAQMD recommends that during Project operations, a localized analysis of CO concentrations be conducted where the Project adds notable traffic to intersections operating at a Level of Service C or worse (i.e., Project traffic increase the volume-to-capacity ratio by two (2) percent or more). This analysis, as presented on pages 543 through 546 of Volume I of the Draft EIR, was conducted using the CALINE4 air quality model, which was developed by Caltrans, and recommended for use in these types of analyses by the SCAQMD. This particular air quality analysis focuses on whether the Project causes, or worsens, an exceedance of the ambient CO air quality standard, regardless of whether or not a sensitive population is present in the area. As such, the analysis was not limited to any particular group of sensitive receptors, but was conservatively assumed to apply to the entire surrounding community. With regard to the analysis itself, localized CO concentration levels (as a result of traffic during Project operations) were forecasted at 19 intersections that would be most impacted by the Project's traffic, in accordance with the modeling protocols established by Caltrans for the CALINE4 dispersion model. The Draft EIR concludes (Table 59, page 545) that Project-generated traffic volumes would have a negligible effect on the projected 1-hour and 8-hour CO concentrations at these 19 intersection locations. Since a significant impact would not occur at the intersections that operate at the highest V/C ratios, no significant impact would occur at any other analyzed roadway intersections as a result of Project-generated traffic volumes, such as those within the Skid Row area. Potential localized impacts from Project-related stationary source operational emissions are anticipated to be minimal, since the proposed Project would not include any industrial, manufacturing or other large stationary combustion equipment (Draft EIR, page 544).

The Draft EIR also evaluates TACs resulting from Project construction and operation. The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. The Draft EIR evaluated the health effects from carcinogenic air toxics according to SCAQMD methodology. This particular air quality analysis started with a quantification of the

$PM_{10}$ emissions generated by on-site construction equipment, as well as haul trucks, and then analyzed how these emissions would affect the closest sensitive downwind receptor. This particular receptor was selected for analysis as these types of emissions are transported by the wind, and thus emissions would be greatest at downwind locations. As concluded in the Draft EIR, the Project would not emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million and, therefore, impacts attributable to TAC emissions would be less than significant (Draft EIR, page 541). Furthermore, it is concluded that TAC emissions during construction, which as with all emissions are based on exterior (outdoor) conditions, would not exceed health risk thresholds in the vicinity of the Project site, including the skid row community. The Draft EIR states that typical sources of acutely and chronically hazardous toxic air contaminants would not be present during Project operation, and as a result, the Project would not release substantial amounts of TACs. Therefore, impacts on human health with regard to any particular group of sensitive receptors would be less than significant. (Draft EIR, Vol. 2, Section IV. F, Air Quality, page 548).]

The Draft EIR also evaluates the Project's operational mobile and stationary source emissions of VOC, $NO_X$, $PM_{10}$ $SO_X$, and CO that would contribute to regional air quality conditions. Daily regional emissions during Project operations were forecasted according to the URBEMIS 2002 model, in accordance with the procedures set forth by the California Air Resources Board (CARB) and SCAQMD guidelines and methodologies. The URBEMIS 2002 methodology identifies whether the SCAQMD threshold levels for emissions, are exceeded on a regional basis. Note that as with construction emissions, operational emissions are based on a conservative estimate of stationary sources in that electricity is produced at various locations within and outside the Los Angeles Basin. Since it is not possible to isolate where electricity is produced, stationary emissions from power generation are conservatively considered to occur within the Basin (Draft EIR, Vol. 2, Section IV.F, Air Quality page 536). As a result, actual emissions during Project operation may be less than those analyzed in the Draft EIR. As concluded in the Draft EIR, the Project would exceed the SCAQMD daily emission threshold for VOC, $NO_X$, $PM_{10}$, and CO. These emissions occur in a regional context and are not specific to any group of people.

With regard to cumulative emissions, the Draft EIR followed the same methodologies as described above. Thus, the Draft EIR concluded that CO, $NO_X$ and VOC regional emissions, and localized $NO_2$ and $PM_{10}$ emissions associated with the Project are already projected to result in a significant impact to air quality. As such, cumulative impacts to air quality with regard to these emissions would also be significant and unavoidable. As with the air quality analysis for Project-specific impacts, the cumulative air quality analysis did not discriminate among or against any particular group of sensitive receptors.

In sum, the Draft EIR does not distinguish between the most and least healthy residents, since the assumption is that all sensitive receptors could be equally affected. For instance, the Draft EIR does not discern between the senior residents of Angelus Plaza or younger student occupants of the Colburn School. Neither does the Draft EIR distinguish between these receptors and residents who may be living outdoors in the vicinity of Main Street. The conclusions of significance in the Draft EIR with regard to constructional and operational air quality impacts would apply equally to all residential and other sensitive receptor locations in the Project area, including, but not limited to those discussed in this comment. No further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-13**

The comment expresses concern that during construction, temporary lane closures and the presence of combustibles could increase the time for emergency response to elderly or disabled residents in downtown as well as temporarily increase the demand for fire services.

Information in the Draft EIR supports the conclusion that there will be no significant impact to these public services arising from Project construction. As shown in Table 74 (Draft EIR, Vol. 2, Section IV.I.1, Fire Services, page 625), the average response times for Fire Stations 3, 4, 9, and 10, which would serve the Project and currently serve the surrounding area are 5.3 minutes, 4.6 minutes, 4.8 minutes, and 4.9 minutes, respectively. These are all below the Citywide average response times of 5.5 minutes to EMS and 5.4 minutes to fire incidents and indicate that existing service is more than adequate. As also discussed in the Draft EIR, the LAFD would be notified of all construction scheduling in order to plan appropriate alternative response routes. Public detour routes would be established where required to divert traffic from the affected street segments. Due to the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, lane closures are not anticipated to significantly affect emergency access or emergency response times. In addition, emergency vehicle access to adjoining and nearby properties would be required to be maintained at all times (Regulatory Measure IV.I.1-1). The Draft EIR concludes that the LAFD's ability to respond to emergency incidents would not be significantly impacted by construction activities (Vol. 2, page 627). It is also concluded that as the area's intersections generally operate at acceptable levels of service, adequate emergency response times would be maintained. The better than City-wide response times, the large number of fire stations in the Project area, and the levels of traffic on the existing street network in the Project area support the conclusion in the Draft EIR that the ability of the LAFD to respond to emergency incidents would not be significantly impacted by Project construction or operational activities.

**RESPONSE NO. 13-14**

The comment expresses the opinion that "downtown residents currently face high waiting times for police assistance". This view is not supported by the data provided by the LAPD as presented in the Draft EIR (Vol. 2, Section IV.1.2, Police Services, page 645). According to the Draft EIR, the LAPD's Central Area, which serves the Project area, has one officer per 130 residents compared to the Citywide ratio of one officer per 478 residents (Draft EIR, Vol. 2, Section IV.1.2, Police Services, page 645). The higher number of officers per resident indicates that more people are served per officer in the Central Area Citywide. However, compared to the Citywide rate of 19 crimes handled per officer, 20 crimes were handled per officer annually in the Central Area, which indicates that conditions in the Project area are comparable to average Citywide conditions. The comments that the ratio of officer to handled crime would increase to 23.4 per officer with the Project and to 59 per officer under cumulative conditions and that the Draft EIR concludes that cumulative impacts with regard to police protection services would be significant unless the City added resources in response to the projected growth are correct. (Draft EIR, page 648). However, if the City added police resources in response to such growth, then the cumulative impact to police services would be less than significant. Yet, it is conservatively assumed that the City may not be able to add such resources commensurate with such population growth, and, therefore, the cumulative impact to police services is determined to be significant.

Under the proposed Project, it is anticipated that activity in the Civic Park would increase on both a daily basis and during special events. As the current Civic Center Mall is currently used extensively on a daily basis, the additional increase in activity on a daily basis is not anticipated to increase to such an extent so as to exceed the capabilities of the County Office of Public Safety. During special events, when the numbers of people using the park would increase substantially, the park operator would employ private security personnel to supplement police services during these events and, therefore, reduce the demand on police services created by these large events. The use of additional security staff would be commensurate with the size of the event. Access to the park would be governed by a set of rules that are consistent with those used throughout public parks in the area. Those who comply with the posted rules will not be denied access to the park, whereas on the other hand, those individuals who chose not to comply with the rules would, out of courtesy to others, be required to leave the park.

**RESPONSE NO. 13-15**

The comment contains opinions on the requirements of the Quimby Act (California Government Code 66477) and the City's implementing local ordinances. The Draft EIR provides that these requirements would mitigate the Project's impact on local parks. To satisfy the

requirements of the Quimby Act, the Project would carry out one of the following: (1) dedicate additional parkland beyond any credited park/recreation space, such that the Project would provide a total of 3 acres per 1,000 Project residents; (2) pay all applicable in-lieu fees for any land dedication requirement shortfall; or (3) provide a combination of the above (Draft EIR, Vol. 2, Section IV.I.4, Parks and Recreation, page 683). The determination of compliance with the Quimby Act requirements and the disposition of fees will rest with City's Department of Building and Safety and the Department of Recreation and Parks. With the implementation of Quimby requirements, no significant impacts with respect to parks and recreational facilities would occur and no further mitigation measures would be required. Therefore, a mitigation measure to ensure inclusive access is not necessary under the CEQA Guidelines and, furthermore, would be inappropriate, since public access to public parks is the right of any visitor or citizen of the City. Further, with respect to the comment inquiring as to the use of the Quimby fee, applicable law requires that law imposing the fee establish a nexus between the needs of the new residents and any new park or recreational facilities. Accordingly, the City's ordinance implementing the Quimby fee program expressly (i) requires that the Quimby fees be used only for the purpose of providing park or recreational sites and facilities which will serve the residential project, (ii) provides that such park facilities shall bear a reasonable relationship to the use of the proposed park and recreational facilities by the future residents of the project, and (iii) establishes criteria for determining that a reasonable relationship exist based on the location of existing park facilities in the City. (Refer to Los Angeles Municipal Code Sections 12.33 and 17.12.) Therefore, no further analysis of this issue or mitigation measure mandating public access in the Final EIR is required.

**RESPONSE NO. 13-16**

This comment makes a number of statements concerning CEQA's requirements concerning mitigation measures and the analysis of such measures in an EIR. While such general statements of law are correct, the commentator's assertion that the Draft EIR for the Project did not comply with those legal requirements is incorrect for the reasons discussed in these Responses to Comments.

**RESPONSE NO. 13-17**

The commentator is correct that CEQA requires that the mitigation measures identified in the EIR be enforceable through permit conditions, agreements, or other legally binding instruments. The Authority, as the lead agency for CEQA purposes, will comply with this requirement by incorporating CEQA mitigation measures identified in the Final EIR into the permits or agreements, as appropriate, to be acted upon by the Authority when it considers the Project. Those permits or agreements would be enforced in accordance with all applicable laws,

including case and statutory law concerning when a permit or agreement approved by a government agency can be enforced by a private third party. Such law carefully balances the interests of the public agency, the parties to the permit or agreements, and the public at large, and compliance with that body of law would properly ensure enforcement of the CEQA mitigation measures identified for the Project.

**RESPONSE NO. 13-18**

The comment expresses the opinion that the Draft EIR has an insufficient number of mitigation measures to reduce Project energy impacts and recommends the LEEDS Guidelines as a basis for analysis. The sufficiency of the Project's two energy-related mitigation measures, the purpose of Regulatory Measure F-2 and Mitigation Measure F-14 to address potentially significant stationary emissions, the Project's energy demand, and the issues of energy evaluation and LEED features are addressed in Response No. 13-4. Please refer to Response to Comment No. 13-4. No further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-19**

The comment expresses the opinion that the traffic mitigation measures are vague in describing implementation. The Draft EIR Traffic Analysis (Vol. 1, Section IV.B, Traffic and Circulation, pages 317-320) identifies and describes transportation Mitigation Measures B-1 through B-6. Mitigation Measure B-6 identifies a series of actions that the Developer of the five development parcels would undertake to further reduce the Project's potential traffic and circulation impacts. To be clear, the Developer of the five development parcels would implement each of the measures described in the first sentences in each of the five bullet points under Mitigation Measure B-6 . The word "menu" in the first sentence of Mitigation Measure B-6 is meant to refer to the mix of programs with each bullet point in Mitigation Measure B-6 that may be chosen to implement each of the five measures listed in the mitigation measure. For example, the first measure listed in Measure B-6 concerns enhanced walking connections, and then a "menu" of options on how to accomplish that performance goal is listed under this measure. Such an approach to mitigation measures is expressly sanctioned by CEQA Guidelines Section 15126.4(a)(1)(B), which provides that measures may specify a performance standard when such measures can be accomplished in more than one way.

Further, with respect to these measures, the traffic report contained in Appendix B (Draft EIR, Vol. 3, Appendix B, page 163) identifies that "these measures would certainly be beneficial to traffic flow, transit service, pedestrian circulation, and overall mobility in the area". While they might potentially mitigate significant impacts at least three locations in the P.M. peak hour (at Hope Street / Temple Street / US-101 Ramps, at Grand Avenue / Temple Street, and at Olive

Street / 5th Street), because the increases in v/c ratios at these locations are close to the threshold of significance, it is difficult to forecast the specific effects and thus to confirm such mitigation quantitatively. For the purposes of providing a conservative analysis it is assumed that while beneficial, and partially mitigating certain significant impacts, they may not reduce remaining impacts to a less than significant level.

It is the intent that the Project will implement the listed mitigation measures in B-1 through B-6 as recommended, in coordination with direction from LADOT

The Mitigation Monitoring and Reporting Program (MMRP) (Section II of this Final EIR) identifies exactly what mitigations have been recommended, as well as the responsibilities for implementation and monitoring of the measures. If the decision makers certify the Final EIR and adopt the MMRP, these will be enforceable mitigation measures for the Project. See also the response to Comment No. 13-20.

**RESPONSE NO. 13-20**

The comment expresses the opinion that the Draft EIR fails to provide evidence in the analysis showing the means and the extent that Mitigation Measures B-4 and B-5 would mitigate traffic impacts. With respect to the ATSC Program identified in Mitigation Measure B-5 (Draft EIR, Vol. 1, Section IV. Traffic and Circulation, page 318-319), which is an area-wide program that typically covers many intersections, LADOT has conservatively determined that implementation of an ATCS program provides a minimum improvement of 3 percent in the capacities of intersections to handle traffic in the system. This level of capacity improvement was, therefore, incorporated into the mitigation analysis of study intersections per the LADOT approved methodology.

With respect to the Transportation Demand Management (TDM) Program identified in Mitigation Measure B-4 (Draft EIR, Vol. 1, Section IV. Traffic and Circulation, page 318), the Draft EIR traffic analysis (also Draft EIR, Vol. 3, Appendix B, Traffic Report, page 161) states that a TDM Program would realistically be limited to the County Office Building component of the Project. Such measures are most effective for office buildings – where transit is often an attractive alternative to drive-alone commuters and high day-long parking charges. However, they are less effective for retail and restaurant trips – where many car trips already have multiple occupants and parking convenience is often more important to visitors than parking cost, and where vehicular trip restraint policies may impact the competitiveness and economic vitality of the land uses. For these reasons vehicle trip reduction programs are rarely applied to commercial land uses other than office uses. Similarly, vehicle trip reduction programs cannot be

realistically applied to residential uses. The traffic analysis also states that such a program, that included the provision of an on-site transportation coordinator, provision of information on transit and logistical support for formation of carpools an vanpools, priority locations for carpool and vanpool parking, and other incentives to use transit and rideshare, and for which the County as a governmental agency would be responsible for funding and implementing, might increase the existing transit and rideshare mode split from 40 percent to 50 percent. This is based on the fact the County already has a successful history of workers using transit and rideshare and, currently, achieves a 42 percent mode-split in this regard (County Hall of Administration Employee Travel Survey, June/July 2005) compared to the 40 percent conservatively assumed in the Draft EIR analysis. Also, as shown in the Draft EIR traffic analysis (Draft EIR, Vol. 1, Section IV. Traffic and Circulation, page 231), there has been an increase in the use of transit and rideshare to downtown in general between the Downtown Cordon Counts of 1990 and 2002. This use is reasonably expected to continue, and also to apply to the County Office Building, particularly given the planned additions to rail transit capacity into the downtown (including the Metro Gold Line Eastside Extension and the Metro Mid-City Exposition Light Rail Transit Project). In addition, as the County is a large centralized and governmental employer, it is able to organize more effective and far-reaching trip reduction programs than smaller and more fragmented offices and businesses. It is, therefore, reasonable to expect that, based on existing data and experience, such an increase in transit and rideshare trips could be achieved for the County Office Building.

This level of increase, and the associated reduction in car trips, was factored into the estimated trip generation for the Project for analysis of this mitigation. Because it would only apply to the Project if it includes a County Office Building, and not all Project uses, it would only mitigate one significant intersection impact in the P.M. peak hour. No further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-21**

The comment expresses the opinion that traffic impacts should be further mitigated and that the traffic analysis fails to recognize combined truck traffic and worker trips. The conclusion of the Draft EIR traffic analysis referenced in the comment that "truck activity may cause significant traffic impacts during construction" actually specifically states: "The highest periods of truck activity would be in the initial six to eight months of construction for each block, when haul trucks would carry excavated material from the site. During those periods it is estimated[8] there may be from 130 trucks a day to a peak of 300 trucks a day. Because some of

[8] *Ibid*

these trips would occur in the A.M. peak hour, they could cause significant but short-term traffic impacts" (Vol. 1, Section IV.B, Traffic and Circulation, page 254).

In the preceding paragraph the Draft EIR traffic analysis states that: "The number of truck trips would vary throughout the construction period, with the highest levels of truck activity occurring in the early stages of construction (for example during excavation). Precise numbers of truck trips are therefore not known at this early stage of Project planning. However, estimates[9] of truck activity indicate that for at least about half of the construction period the number of truck trips would be less than 40 trips per day. For much of the remainder of the construction period the number of truck trips would be in the range of 40 to 120 trips per day. Because of the low volume of trips and the fact that they would mostly occur outside the peak hours, the impact of truck trips during these periods is not expected to be significant" (Vol. 1, Section IV.B, Traffic and Circulation, page 254).

The Draft EIR then identifies Mitigation Measures B-1, B-2, and B-3, including the development of a Construction Traffic Control/Management Plan to be approved by LADOT, to address the potentially significant short-term construction impacts (Vol. 1, Section IV.B, Traffic and Circulation, page 317-318).

With respect to the comment that the traffic analysis fails to recognize that truck traffic and worker traffic would cumulatively cause significant traffic impacts: the traffic analysis considered (a) that the construction worker trips would occur outside of the peak hours (before the A.M. peak hour and before the P.M. peak hour), and that therefore the impact of construction worker trips on the peak hours would be negligible (Vol. 1, Section IV.B, Traffic and Circulation, page 255); and (b) that the number of construction truck trips would typically be in the range of 40 to 120 trips a day (Vol. 1, Section IV.B, Traffic and Circulation, page 254). While these trips would generally be outside the peak hours, they would also be spread out over all of the construction work hours, and so would not be concentrated in the same hours as the construction workers trips. Because there would be no simultaneous concentration of trips, the construction truck trips would not cause cumulative impacts with construction worker trips.

See also the response to Comment 13-6 regarding the work shifts which provide the basis for the analysis that construction worker trips will occur outside the peak hours.

[9] *The Related Companies, April 2006*

**RESPONSE NO. 13-22**

The comment expresses the opinion that the "the Project would result in significant traffic impacts, thus exacerbating an already well-below acceptable traffic situation," and concludes that an increase in the Developer's requirement for affordable housing should be added as additional mitigation of this impact.

The comment's characterization of future traffic is not accurate with respect to the Future Without Project conditions. As the traffic analysis identifies (Draft EIR, Vol. 3, Appendix B, Traffic Report, pages 43-44), for the Future Without Project conditions, the majority of intersections (25 of the 32 studied) will continue to operate at LOS C or better during the A.M. peak hour, with three operating at LOS D, and only 4 operating at LOS E; and in the P.M. peak hour, again the majority of intersections (21 of the 32 studied) will continue to operate at LOS C or better, with five operating at LOS D, five operating at LOS E, and only one operating at LOS F.

With respect to conditions after mitigation, the Draft EIR traffic analysis identifies that for the Project with County Office Building Option, there would be one significant impact remaining in the A.M. peak period, where the resultant level of service would be LOS D; and that of the 12 remaining significant impacts in the P.M. peak hour, nine intersections (the vast majority) would operate at LOS D or better, two would operate at LOS E and one would operate at LOS F (Vol. 1, Section IV.B, Traffic and Circulation, pages 322-326). The comment fails to mention that the Draft EIR also identifies that for the Project with Additional Residential Development Option, there would be fewer remaining significant traffic impacts, with no remaining significant traffic impacts in the A.M. peak hour and seven remaining significant traffic impacts in the P.M. peak hour, of which six intersections would operate at LOS D or better, and one intersection would operate at LOS F (Vol. 1, Section IV.B, Traffic and Circulation, page 328).

With respect to the suggestion for more affordable housing in the Project as a "mitigation measure" for residual air quality impacts your request will be forwarded to project decision makers before they act on the Project. As noted in Response No. 13-2 above, mitigation measures for CEQA purposes have a precise definition and must be imposed within legal constraints, including constitutional limits. The developer has committed to 20 percent of the overall housing units in the Project being affordable units, which involves both private and public subsidies, and additional subsidies from the LA/CRA or others for an even greater number of affordable housing units in the Project are not available or feasible at this time, and key

Project objectives would not be achieved if more financial resources were required for additional affordable housing units.

**RESPONSE NO. 13-23**

The comment expresses the opinion that a strong local hiring program will "mitigate truck and worker traffic." At the outset, it should be noted that the mixed use nature of the Project and its strategic location near mass transit centers will greatly reduce the number of traffic trips to and from the Project. In addition, although not required as a CEQA mitigation measure, the Project Developer plans to have a local hiring program. While they are currently working on the specifics of such a program, the program is not finalized and so no details are available at this time. In addition, representatives from the City, County, CRA and the developer are now working on the creation of a job outreach and training program that would provide opportunities for local residents to access both the construction and permanent jobs created by the Grand Avenue Project. The developer has offered funding assistance for jobs programs tied directly to the Grand Avenue Project. To supplement this commitment the City, County and CRA are examining both in-kind and actual cash contributions to create an effective local hiring and training program. Finally, it should be noted that the DEIR identifies that there would be no significant transportation impacts due to construction worker trips, so no mitigation measures are justified under CEQA (see also Response to Comment 13-6 and Comment 13-21).

**RESPONSE NO. 13-24**

The comment expresses the opinion that the Project's air quality impacts need to be further mitigated. The Draft EIR complies with CEQA's mandate that all feasible air quality mitigation measures shall be implemented. The Draft EIR also complies with CEQA Guidelines Section 15126.4(a)(1)(B) in that the Draft EIR discusses the effects of the mitigation measures, as listed in Draft EIR, Vol. 2, Section IV.F, page 566, Level of Significance After Mitigation. Feasible mitigation measures are based on, and consistent with, SQAQMD Rules and other recommendations, as set forth in the SCAQMD's CEQA Air Quality Handbook. Air quality Mitigation Measure F-1 has been expanded and additional mitigation measures, which are intended to address the environmental effects of the Project, are provided in the Final EIR (refer to Section III, Mitigation Monitoring and Reporting Program, and Section IV, Corrections and Additions, Subsection IV.F, of this Final EIR). With respect to the commentator's citation to the CEQA Guidelines requiring certain findings by the lead agency, the Authority will comply with that requirement. No further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-25**

The comment states that the Draft EIR does not evaluate local hiring as a mitigation measure to reduce air quality impacts. Please refer to the "hiring program" response in Response to Comment No. 13-23.

**RESPONSE NO. 13-26**

The Developer has agreed to the use of selective catalytic reduction systems (e.g., catalytic converters) to mitigate nitrogen oxide emissions for major earth moving equipment, haul trucks, and excavation equipment, since these are the primary source of on-site construction emissions. Please refer to Section III, Mitigation Monitoring and Reporting Program and Section IV. Corrections and Additions, Subsection IV.F, Air Quality, of this Final EIR.

**RESPONSE NO. 13-27**

The Developer has agreed to the use of diesel particulate filters to mitigate nitrogen oxide emissions for major earth moving equipment, haul trucks, and excavation equipment, since these are the primary source of on-site construction emissions. Please refer to Section III, Mitigation Monitoring and Reporting Program and Section IV. Corrections and Additions, Subsection IV.F, Air Quality, of this Final EIR.

**RESPONSE NO. 13-28**

The comment expresses the opinion that the Draft EIR fails to evaluate the extent to which each air quality mitigation measure decreases the corresponding impact. The Draft EIR provides this information consistent with current methodologies. With the exception of Mitigation Measure F-1, which requires the implementation of AQMD Rule 403 in dust abatement, and Mitigation Measure F-4, which requires haul truck cleaning prior to exiting construction sites, no mitigation measures are quantifiable under current SCAQMD methodology and cannot be directly applied to the "corresponding" impact. The extent of emission reduction cited in the Draft EIR (Vol. 2, Section IV.F, page 566, Level of Significance After Mitigation), which states: "$PM_{10}$, VOC, $NO_x$, $SO_x$, and CO would be reduced by a minimum of 5 percent and fugitive dust emissions would be reduced by an additional 16 percent," is based on the URBEMIS 2002 program approved by the SCAQMD. The URBEMIS 2002 program reflects the quantifiable reductions available from Mitigation Measure F-1, which requires the implementation of AQMD Rule 403 in dust abatement and Mitigation Measure F-4, which requires cleaning haul trucks prior to exiting construction sites (Draft EIR, page 560). Although

the Project's mitigation measures are consistent with recommendations contained in the SCAQMD's CEQA Handbook, no other mitigation measures are quantifiable or directly connected to the Project's air quality impacts. It is also known that certain enforceable measures would reduce emissions, but information regarding the extent of these emission reductions is not currently available from the SCAQMD. As an example, although a range of mitigation and regulatory measures and design features would be required during Project operation, none of these are quantifiable. Therefore, with the exception of the two measures described above, to ensure a conservative and quantifiable analysis, none of the enforceable mitigation and regulatory measures or design features is factored into the Draft EIR's conclusions of significance, since such measures are not quantifiable under current SCAQMD methodologies. Thus, actual emission levels would be less than the levels described in "Level of Significance After Mitigation" section of the Draft EIR (pages 566-577), since the identified mitigation measures are known to reduce emission levels. The Draft EIR provides the most complete and clear analysis of the impacts and mitigation measures currently available under SCAQMD methodologies. No further analysis of this issue in the Final EIR is required. With respect to the commentator's citation to the CEQA Guideline requiring certain findings by the lead agency, the Authority will comply with that requirement.

**RESPONSE NO. 13-29**

Please refer to Response No. 13-4 regarding the comment's suggestions about LEED.

**RESPONSE NO. 13-30**

The comment suggests that the developer should be required to pay for free transit passes for workers and residents of the Project. Public transit may not be a practical alternative for the majority of construction workers who need to transport tool cases and other equipment daily. Regardless, the proximity of existing transit facilities to the Project site would facilitate the use of transit. In addition, local air quality impacts associated with worker trips during construction would be reduced through the implementation of offsite (outside the Civic Center) parking. In addition, a new mitigation measure (Mitigation Measure F-11) has been added to the Mitigation Monitoring and Reporting Program, presented in Section III of this Final EIR. Mitigation F-11 will require the developer to provide shuttle service to construction workers who are required to park in offsite parking lots that are located more than 1,100 feet of the respective construction sites. Further, a measure has been formulated that requires the developer to pay for a transit pass for those construction workers who commit to not parking their automobiles for the life of the particular construction project for which they have been assigned.

With respect to the proposal that the developer pay for transit passes for residents at the Project, such a measure is not feasible given the turnover in residency that would occur during the life of the Project, and the current need to design and build the parking structure based on the assumption that, at any given time in the future, all residents would forego the transit passes and desire the parking spaces required by Los Angeles City Code. It is further infeasible for the developer to pay upfront for transit passes, because after construction, the travel activity of the Project is related not to the developer, but to the individual commercial lessee entities and to individual residential unit owners, over which the developer has little control. It is, therefore, infeasible for the developer to bear an unlimited and continuing future financial cost for which no specific actions or benefits are guaranteed. In addition, the provision of a transit pass cannot reduce or eliminate the City's requirement for providing parking spaces as per the Los Angeles Municipal Code.

**RESPONSE NO. 13-31**

The comment suggests that air quality impacts would be mitigated through the Developer funding of environmental health programs to study health needs and the establishment of clinics. Emissions that exceed established threshold standards would not be reduced through the funding of such facilities and, therefore, this suggested mitigation measure does not respond to the significant impacts of the project In addition, CEQA Guidelines Section 15126.4(a)(4) requires that a CEQA mitigation measure can only be imposed when there is an "essential nexus" between the impact and the mitigation measure. Further, the comment seems directed at the effects of the existing air quality in the City, and CEQA requires a project to mitigate the impacts that it causes and not the effects caused by prior development. Accordingly, no further analysis of this issue in the Final EIR is required.

**RESPONSE NO. 13-32**

The comment expresses the opinion that the Draft EIR inadequately and inconsistently addresses economic and social issues as an introduction to its request that a number of community benefits be adopted as mitigation measures as set out in Comment No. 13-33. . Further, the comment expresses and opinion that mitigation measures should be adopted to "minimize the negative economic impact of the Project and to render the Project consistent with its stated purposes". The record indicates that the Draft EIR complies with all requirements of the CEQA Guidelines by disclosing the potentially significant environmental impacts of the Project and identifying and analyzing mitigation measures and alternatives that can reduce or eliminate these impacts in a constitutional manner. Please see also the specific responses to specific comments. The decision makers will be balancing the impacts and benefits of the

Project. These comments will be forwarded to the public agency decision makers for consideration as part of their review of the Project.

**RESPONSE NO. 13-33**

This comment recommends that specific community benefits be implemented in order to, among other stated reasons, address "economic and social impacts of the Project." As a general rule, an EIR is required to evaluate only the environmental impacts of a project, and economic and social effects of a project are not treated as significant effects on the environment. CEQA Guidelines Section 15131. Further, the impacts analyzed in an EIR must be "related to a physical change." CEQA Guidelines Section 15358(b). Thus, economic or social effects that are not related to physical impacts need not be evaluated in an EIR. *See, Goleta Union School District v. Regents of the University of California* (1995) 37 Cal.App.4th 1025,1031-1032; *see also, El Dorado Union High School District v. City of Placerville* (1983) 144 Cal.App.3d 123, 131. For example, in *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1989) 209 Cal.App.3d 1502, the construction of childcare facilities as a mitigation measure was held unnecessary in response to a project's social and economic impact. *Id.* at 1516. (The mitigation measure would have been in response to an employer's need for a secure labor force comprised of employees with accessible and affordable child care. *Id.)*

Although the lead and responsible agencies are planning on incorporating a number of required community benefits into the Project, they are not mitigation measures within the meaning of CEQA. These programs are not appropriate as mitigation measures and are not incorporated into the Final EIR for the reasons discussed in earlier responses to comments. For example, with respect to the suggestion that a local job hiring program should be adopted to mitigate traffic and air quality impacts, refer to Response No. 13-23; refer to Response No. 13-22 with respect to the suggestion that additional affordable housing units in the Project be required as a mitigation measure; refer to Response No. 13-2with respect to the suggestion concerning the use of the $50 million of Project lease payments for alternative park facilities; and refer to Response No. 13-12 concerning the EIR's analysis of the Project's impacts on the homeless. With respect to the suggestion that a Project labor agreement be required for the Project, the comment does not suggest that such an agreement would mitigate any significant environmental impacts and, therefore, such a measure cannot be imposed under CEQA as a mitigation measure.

**RESPONSE NO. 13-34**

As requested, the notice specified in California Public Resources Code Section 21092(b)(3) will be sent to the address provided. We have confirmed in addition that this

address is also on the Project mailing list for occasional additional mailings beyond the notice specified in that statute.

**RESPONSE NO. 13-35**

The concluding comment requests that the Authority "include in the administrative record these comments and attached exhibits." As no exhibits are attached to the Legal Aid Foundation's letter, nor are any exhibits referenced in any prior comments, the Authority contacted the author of the comment and confirmed that no exhibits were, in fact, attached. These comments and responses as well as the comments from all other participants in the public review process and responses will be a part of the Final EIR. The Authority has provided a good faith reasoned analysis in response to the comments on the Project's Draft EIR as required by CEQA, and appreciates the interest in the Project evidenced by the public participation.

Letter No. 14

RECEIVED AUG 0 3 2006

LOS ANGELES CONSERVANCY

August 2, 2006

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Re: Draft Environmental Impact Report – Grand Avenue Project

Dear Ms. Welborne:

I am writing on behalf of the Los Angeles Conservancy to provide comments on the Draft Environmental Impact Report (DEIR) for the Grand Avenue Project. The Conservancy, the nation's largest local preservation organization, was founded in 1978 to preserve Los Angeles's historic and cultural resources through advocacy and education. 14-1

*Significance*
Our review of the DEIR focuses on the project's potential impact on the historic and cultural resources of the Los Angeles Civic Center. The Conservancy agrees with the document's conclusion that the Civic Center contains a potential California Register Historic District as delineated in Figure 41 (page 441). **We believe that it is critical that no aspect of the proposed project jeopardize this district's eligibility or potential future designation**. The project site that is depicted in Figures 2 and 3 (pages 102-103) overlaps with identified cultural resources at only one location, the Civic Center Mall, which is located at the heart of the potential historic district. This area, therefore, is the focus of our commentary. The project site does, however, abut several identified and/or potential historic resources including the County Hall of Administration, the County Courthouse, the Music Center, Disney Hall, the Hall of Records, the County Law Library, and City Hall. Though no work is proposed in the DEIR that will directly impact sites outside of the project boundary, the Conservancy reserves the right of future comment regarding potential direct or ancillary impacts on these sites as the current conceptual design scheme(s) are finalized. 14-2

The DEIR correctly identifies the portion of the existing Civic Center Mall bounded by Grand Street on the west, the Kenneth Hahn Hall of Administration on the north, Hill Street on the east, and the County Courthouse, on the south, as a significant historic landscape that is individually eligible for listing on the California Register and would be 14-3

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a contributing feature of the potential Civic Center historic district. The Conservancy additionally believes that this area, also known as the Paseo de Los Pobladores (the Paseo) may also be eligible for listing on the National Register of Historic Places, both individually and as part of a larger district, despite the DEIR's finding to the contrary. 14-3

The DEIR finds that the portion of the Mall between Hill Street and Broadway, known as the Court of Flags, is not individually eligible for listing on the California Register, but appears eligible as a contributing feature of the potential Civic Center historic district. This finding is predicated on the area's spatial relationship with the adjacent open space and structures, rather than for any intrinsic design importance or other significance acquired over time. The Conservancy feels that if this area is treated as an open, landscaped space that reflects and enhances the historic axiality of the Mall, substantial alterations to it will be acceptable. We believe that the same holds true for the open parking lot at the eastern end of the Mall between Broadway and Spring Street. 14-4

*Project Impacts*

The Conservancy believes that the Grand Avenue Project must respect and retain the historic features and character that define the Paseo. This portion of the Mall continues to reflect an important point in time at which the city's long-planned and oft-delayed Civic Center was finally realized. It is a critical aspect of the story of the historic development of downtown Los Angeles and is also one of the most important and intact mid-20th century public spaces to be found anywhere in the city.

That said, we also recognize that this space has never realized its full potential in terms of public accessibility and use. Hidden from the view of both passing pedestrians and motorists, its primary users appear to be employees and visitors of the adjacent government buildings. The Conservancy sees the lack of visual and physical access from Grand and Hill Streets as the primary impediment to making the Paseo a vital and widely-used component of the Civic Center. A revitalized Paseo and expanded Civic Center Mall will become a tremendous asset not only for the Grand Avenue Project, but also for those working in and visiting the Civic Center, as well as the thousands of new residents choosing to make downtown their home. We see the potential for significant alterations and modifications to this area that will increase its accessibility. At the same time, we believe these changes can be made in a manner that will retain not only specific character-defining historic features, but also the historic character and ambiance that make the Paseo one of the city's most important historic landscapes. 14-5

The "Conceptual Plan for Civic Park" depicted in Figure 7 (page 121) indicates that the Paseo portion of the Mall is being considered for a radical alteration that would remove and/or relocate many, if not most, of its identified historic features. **If this plan is implemented, the Conservancy strongly believes that the Paseo's potential eligibility for listing on the California Register will be lost.** The DEIR states that the Conceptual Plan "does not represent the only development scenario that would be possible." We hope that the project team will develop a new design that allows for significant changes at the east and west ends of the Paseo to improve accessibility while also preserving the integrity of the historic landscape through the retention of its significant features. 14-6 14-7

Recognizing that the Conceptual Plan (shown in Figure 7 and discussed on pages 121-123 of the DEIR) is preliminary and highly schematic, it does offer the clear suggestion that the design team is entertaining certain concepts that we find unacceptable. Specifically, we are concerned about:

- The relocation and/or resizing of the Arthur J. Will Fountain. The fountain is one of the most important components of the Mall's historic landscape and we believe it should be left in place and made something to be celebrated rather than tucked in the corner. Its importance on the Mall's central axis is underscored by its relationship with the Music Center fountain and the DWP Building. 14-8

- The steps and terraces shown descending into the park from Grand Avenue appear to necessitate the proposed relocation of the fountain. We fully support the new grade-level plaza on Grand Avenue that will overlook the new park. We feel, however, that new steps and landings on either side of the existing fountain could create the dramatic sense of entry the designers appear to seek, while also preserving the symmetry that is an important aspect of the Paseo's historic Modernist design. 14-9

- The loss of all historic circulation paths, retaining walls, and elevator enclosures will remove significant historic fabric and eliminate the Paseo's Modernist design integrity, which is still remarkably intact. We also believe that the meandering walkways and amorphously-shaped lawn area shown in Figure 7 do not respond to the project's stated goal of finding design solutions that work with the Modernist design of the County Buildings. This drawing also suggests that the cross-axial plaza that currently links the *Mall-facing entries of the County Buildings will be eliminated. Given the steady* traffic between the buildings, we believe that this area should remain paved and would perhaps serve as a suitable location for some of the new pavilions and/or kiosks being proposed for businesses serving the patrons of the new park. 14-10

*Character-Defining Features*

The Historic Resources Technical Report [DEIR, Volume 3, Appendix C, page 66] identifies seven "architecturally specific character-defining features of the park [Paseo] that support its individual eligibility for State designation." These are:

1. the Arthur J. Will fountain and pools
2. the pink granite-clad planters and retaining wall, along with the concrete benches
3. the circulation system (concrete walkways and open space)
4. the elevator enclosures at the center of the Paseo
5. the light poles and speaker poles
6. the spiral automobile ramps at Hill Street
7. the spiral automobile ramps and granite-clad stairs at Grand Avenue

14-11

Four of these, numbers 1, 2, 4, and 5, are identified as "key features." The Conservancy agrees with the report's finding that the removal or substantial alteration of the majority of these "key" features would lead to a substantial adverse impact, and believe that they

should be retained *in situ* to the greatest extent possible. This is especially true of the Arthur J. Will Fountain, which is perhaps the most important individual feature of the Paseo's historic design as well as one of the few notable public Modernist fountains to be found anywhere in the city. We do concur with the report's finding that the spiral automobile ramps will be largely retained even if they undergo grade-level alterations to improve access to the park and that this work will not result in a significant impact. Additionally, we do not believe that the loss of the existing stairways at Grand Street will result in any change in the Paseo's eligibility for listing on the California Register.

We do believe the Paseo's existing circulation plan (number 3 above) is historically important. Though we see room for the reconfiguration of the paved walkways to accommodate changes related to increased accessibility at the east and west, we believe that the linearity and symmetry of the existing design should be respected in any new design and that the cross-axial plaza area that connects the entrances to the County buildings should be retained. We also believe that many of the mature trees that make the Paseo a pleasant site today should be allowed to continue to do so in the new design, particularly along the north and south edges of the site.

14-11

*Alternatives*

Alternative 4: Alternative Design [DEIR pages 813-827] comes very close to meeting the Conservancy's goal of retaining the Paseo's historic character and its eligibility for listing on the California Register. We believe that a slightly modified version of this alternative could meet all project goals, allow alterations that will greatly enhance accessibility to the Civic Park, and also retain the character-defining features and overall character we hope to see protected.

14-12

Our issue with Alternative 4 is its creation of an artificial nexus between the design of the Civic Park and the placement of the two towers on Parcels L and M-2. The location of the proposed towers is not related to either the design of the Civic Park or the Paseo's historic features and character. The DEIR states that, "the change in location of the towers on Parcels L and M-2 would not have any effect on historic resources...." Given this, we see no reason for Alternative 4 to link these unrelated aspects of the project. Our concern is that the preservation-minded portion of this alternative may be dismissed because of independent issues related to the construction of the towers.

14-13

Overall, we believe the preservation-oriented portion of Alternative 4 will meet our goals and strongly support the adoption of its preservation-oriented portion in the Final EIR, calling it, perhaps, the "Preservation Alternative." We also think it critical that the document reference not only the Secretary of the Interior's *Standards for Rehabilitation*, but also the *Guidelines for the Treatment of Cultural Landscapes.*

14-14

The Conservancy could also support Alternative 2, which proposes that no work occur at the existing Civic Center Mall. We do, however, see great value in increasing the Paseo's visual and physical accessibility from the street, as well as in the development of enhanced and additional park space on the lots between Hill and Spring Streets, and therefore have focused our comments on Alternative 4.

14-15

*Conclusion*

The Conservancy sees a magnificent opportunity in the Grand Avenue Project's inclusion of the Civic Center Mall within its scope. Once one ascends or descends into the park from the street, there is a sense of surprise about how pleasant the space seems. What was a moment before invisible, reveals itself to be a hidden oasis, awaiting discovery. By allowing more people than ever to discover and use the Paseo, the project will be doing a great favor to the city. But by erasing what is there today, by removing not only a beautiful and functional park, but also an important part of the history of the city and its development, is a disservice - we will lose something that cannot be brought back.

As we have noted above, we see many failings in the design of the Paseo in terms of how it addresses Grand Avenue and Hill Street. Improvements in accessibility, and the consequent alterations and new construction that this will require, will undoubtedly change the appearance of the Paseo. But these do not need to obliterate what is there. The Secretary's *Guidelines for the Treatment of Cultural Landscapes* allow for significant interventions when they are made in conjunction with significant preservation – a situation we hope to see recommended as the Conceptual Design is refined and the Final EIR is prepared. 14-16

We believe that our preservation goals will mesh smoothly with the project goals if the following elements are retained in the manner we propose:

- the Arthur J. Will fountain and pools – *in situ*
- the granite-clad retaining planters and retaining walls – *in situ* and/or reconfigured to meet needs of new design
- the pedestrian circulation system – in concept, respecting the linearity and axiality of the historic design
- the granite-clad elevator enclosures – *in situ*
- the light poles and speaker poles – *in situ* or relocated as required by the new design
- the mature trees located along the north and south edges of the Paseo – *in situ* or relocated as required by new design

Thank you for your consideration of our position. Please feel free to contact me if you have any questions.

Sincerely,

Jay Platt
Preservation Advocate

**LETTER NO. 14**

Los Angeles Conservancy
Jay Platt
Preservation Advocate
523 West Sixth Street
Suite 826
Los Angeles, CA 90014

**RESPONSE NO. 14-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Los Angeles Conservancy.

**RESPONSE NO. 14-2**

The Conservancy's comment concurs with the conclusion of the Draft EIR that the Civic Center contains a potential California Register Historic District. The Conservancy's position that it is critical that no aspect of the Project jeopardize this district's eligibility or potential future designation is also acknowledged. The Conservancy's identification of the Project's geographical proximity to potential historical resources including the County Hall of Administration, the County Courthouse, the Music Center, Walt Disney Concert Hall, the Hall of Records, the County Law Library, and City Hall is reflected in the analysis of historic resources as presented in Section IV.D, Historical Resources, within Volume 1 of the Draft EIR. It is also understood that the Conservancy concurs that the Project overlaps with only one identified cultural resource, the Civic Center Mall.

**RESPONSE NO. 14-3**

The Conservancy's concurrence with the conclusion of the Draft EIR that the Civic Center Mall is individually eligible for listing on the California Register and would be a contributing feature of the potential Civic Center historic district is acknowledged. However, the Conservancy and the Project's historian have a difference of opinion on whether the Civic Center Mall is also eligible for listing on the National Register, both individually and as part of a larger potential historic district. The Conservancy's comment indicates that it may also be eligible for the National Register. The most important point, however, is that for CEQA purposes, a resource

need only be recognized at the local or state level in order to be afforded full protection as a historical resource. Therefore, a difference of opinion on this point is a difference without a distinction for the protection of this cultural resource, or for the CEQA analysis. In other words, whether a historical resource is eligible or listed in the National Register or just the California Register, the resource would be afforded the same protections. The Civic Center Mall is a publicly owned park and would continue to remain in the public domain and, as such, would not be as susceptible to development pressures as would a private property. The Draft EIR has evaluated the property and has made conclusions of significance regarding the potential removal of the existing character defining features (Draft EIR, Vol. 1, page 489), thus complying with CEQA requirements.

Although this difference of opinion among experts need not be resolved for purposes of an adequate CEQA analysis, the basis for the view set out in the Draft EIR that the Civic Center Mall is not eligible for the National Register either as part of a district or individually is explained briefly here . See also Draft EIR Vol. I, Section IV D and the Historic Resources Study in Appendix C. At a technical level, the Draft EIR identifies the portion of the existing Civic Center Mall, bounded by Grand Avenue on the west, the Kenneth Hahn Hall of Administration building to the north, Hill Street to the east, and the County Courthouse to the south as a significant historic landscape eligible for individual listing in the California Register. The Draft EIR also identified this site as a contributing feature to the Civic Center Historic District, which is also potentially eligible for California Register listing. This resource was not identified in the Draft EIR as eligible for listing in the National Register of Historic Places (National Register) because the National Register criteria consideration for properties less than 50 years of age is more explicit than the California Register's special consideration for properties less than 50 years old. Besides needing sufficient time to elapse to gain a proper perspective into the historical importance of a property, properties potentially eligible for the National Register must also have extraordinary importance. As noted in the National Register Bulletin "How to Apply the National Register Criteria for Evaluation," such properties have included the launch pad at Cape Canaveral from which men first traveled to the moon, military installations associated with the Cold War, and the Chrysler Building in New York, which epitomized the "Style Moderne" architecture.[10] Accordingly, for the potential Los Angeles Civic Center Historic District to be eligible for the National Register, it must demonstrate exceptional importance for historical and/or architectural associations. The properties in question include the Court of Flags (1968), the Los Angeles County Law Library, the Mildred E. Lillie Building (1953), and the Clara Shortridge Foltz Criminal Justice Center (1972). Because "exceptional significance" cannot be

[10] *National Register Bulletin: How to Apply the National Register Criteria for Evaluation, U.S. Department of Interior, National Park Service, 1997, p. 42.*

demonstrated collectively in all of the contributing properties within the historic district, it is concluded in the Draft EIR that the Civic Center Mall does not satisfy the specifications defined under the National Register's "Criteria Consideration G: Properties that have Achieved Significance within the Last Fifty Years" and therefore, it was concluded, in the Draft EIR, that the property would be ineligible for National Register level designation.

As for the Civic Center Mall (El Paseo de los Pobladores de Los Angeles) itself, which is also less than 50 years of age, the collectiveness of features within the site does not rise to a level of "exceptional significance" necessary for individual listing in the National Register. Overall, as described in the Draft EIR, in consideration of the National Register's required "exceptional importance" for properties less than 50 years of age, the park does not appear to adequately possess such a level of historical or architectural significance necessary to merit National Register listing. Nonetheless, using the criteria and integrity factors at the state level, the property is eligible for California Register listing. The Conservancy agrees with this critical portion of the analysis in the DEIR. The Conservancy's view that the Paseo may also be eligible for the National Register both individually and part of a district will be provided to the Project decision makers prior to any action on the Project.

**RESPONSE NO. 14-4**

The Conservancy's comment agrees with the Draft EIR's conclusion that the Court of Flags is not individually eligible for listing in the California Register, but may be a contributing feature of the potential Civic Center Historic District. It is also understood that the Conservancy feels that if this area, as well as the parking lot at the east end of the Civic Center Park, is treated as an open, landscaped space, it would enhance the historic axis of the Mall and that subsequent alterations would be acceptable.

**RESPONSE NO. 14-5**

The Conservancy's comment states that the Grand Avenue Project must respect and retain the historic features and the character that define the Paseo. The comment also states that the Paseo section of the Civic Center Mall continues to reflect an important point in the development of the Civic Center and that it represents one of the most important and intact mid-20th Century public spaces in the City. These views are consistent with the Draft EIR, which identifies the importance of the Civic Center Mall and presents mitigation measures that are intended to protect the Paseo and the surrounding Civic Center to the greatest extent feasible (Volume 1 of the Draft EIR, pages 481 through 488). The Conservancy also concurs with the discussion in the Draft EIR that the Civic Center Mall has never realized its full potential in

terms of public accessibility and use, since it is hidden from view of both passing pedestrians and motorists. The Conservancy also sees the lack of visual and physical access from Grand Avenue and Hill Street as the primary impediment to making the Paseo a vital and widely used component of the Civic Center.

The Conservancy acknowledges that the objective of the Project, which includes a revitalized Paseo and expanded Civic Center Mall, would become a great asset for visitors and residents choosing to live in downtown Los Angeles. The Conservancy sees the potential for significant alterations and modifications to increase the Mall's accessibility and, at the same time, expresses the view that changes can be made in a manner that retains character-defining features and historic character and ambience that make the Paseo one of the City's most important historic landscapes. The intent of the Project is to create a welcoming public open space that would create, define, and celebrate the City's civic and cultural center as a regional destination and to improve both pedestrian and visual access to the park through the elimination of barriers such as the parking garage ramps at Grand Avenue and at Hill Street.

It is important to recognize that the park design that is presented in the Draft EIR is a conceptual design for the park that continues to evolve through a process of public input and design refinement. Furthermore, it is the intent of the Project to maintain the character of the park, as described in Section IV.D, Historical Resources, as well as enhance public enjoyment. The design team for the park includes Brenda Levin, from Levin and Associates and Mark Rios from Rios Clemente Hale Studios, a team that brings to this project design professionals with both experience and honors for historic rehabilitation projects in the City. The design process for the park has included a great deal of public outreach and research, and its progress can be followed on the website for the Grand Avenue Committee at www.grandavenuecommittee.org. See also Response No. 14-7 below on this process. The final park design seeks to balance the interests of historical preservation and accessibility. Even though the final park design will evolve and vary from the conceptual plan presented in the Draft EIR, the conclusions and mitigation measures presented in the Draft EIR regarding the significance of certain changes (primarily the potential removal of the park's four character defining features) continue to be valid.

The Conservancy's concerns and views that changes to the park can be made in a way which retains character defining features as well as its historic character and ambiance are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 14-6**

The Conservancy's comment expresses concern that the Conceptual Plan for the Civic Park, as depicted in Figure 7 on page 121 of Volume 1 of the Draft EIR, illustrates the Paseo portion of the Civic Center Mall as being altered from its present state, with many of the identified character-defining features removed or relocated within the park. However, Mitigation Measure D-5 (see page 483 of Volume 1 of the Draft EIR) which states that "prior to the start of each construction phase of the Civic Center Mall, the responsible parties for implementing the Civic Center Park project under applicable agreements shall submit plans to the Authority for review and approval to ensure that impacts to the potentially eligible Civic Center Mall is reduced to the maximum extent practicable" is incorporated in the Final EIR . Four key character-defining features are listed in this mitigation measure. The objective of this measure is to ensure, to the maximum extent practicable, that those qualities that make the property eligible for the California Register are not altered to such an extent as to compromise the property's overall historical character. This measure is also in place to ensure that any work conducted on this property in connection with the proposed Project is done so in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (more specifically the Standards for Rehabilitation), as well as the *Guidelines for the Treatment of Cultural Landscapes* (hereinafter collectively referred to as the Standards). If the Standards are followed as set forth in the mitigation measure then the Paseo's potential eligibility for listing on the California Register would be retained. According to CEQA, if work on a historic resource is done in a manner consistent with the Standards then it shall be considered mitigated to a less than significant level. See the Class 31 categorical exemption for rehabilitation work consistent with the Standards on historical resources in the State CEQA Guidelines. Please see also Response No. 14-7 about the evolution of the park design.

**RESPONSE NO. 14-7**

The comment refers to the Draft EIR statement that the Conceptual Plan for the Civic Park depicted in the Draft EIR does not represent the only possible development scenario (Volume 1, Section II, Project Description, page 120). The design of the Civic Park is an on-going public effort and, in this regard, continues to evolve. The park's design team has developed a program for the park that involved the community, compared and contrasted design strategies, reviewed other national and international park designs, and studied the history and evolution of the Project site. The Project Developer and the Grand Avenue Committee sponsored the first public outreach session after the Conceptual Plan in June 2006. Participants at the workshop and those contributing via the internet (approximately 500 total respondents) were surveyed to gather information about the existing park facilities as well as those they would

like to see in the future. Elements of the existing park design that were identified as important included, but were not limited to, maintaining the fountain, moving or relocating the ramps to the subterranean parking garage, improving access to the park, and maintaining passive quiet places. A second workshop was held on August 19, 2006 in which roughly half of those who attended were also present at the first workshop. The design team appreciated the attendance and participation of Conservancy representatives at that public workshop and the continued interest of the Conservancy as the park design refinements are developed. The attendees were encouraged to respond specifically to a proposed park design that reflected a "four parks" concept, which provided for a Fountain Plaza, an Urban Terrace, a City Garden, and a Civic Green. Based on the extensive public input, the current thinking of the park designers is that some of the existing park elements would likely be recommended to be retained, including the Arthur J. Will Memorial Fountain, as well as the view of City Hall, as well as passive and quiet spaces and mature landscape. The concerns of the Conservancy that the Project team develop a new design that allows for significant changes to improve accessibility while preserving the integrity of the historic landscape are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 14-8**

The comment provides an introduction to the Conservancy's concern that the preliminary Conceptual Plan for the park suggests specific concepts, including the relocation and resizing of the Arthur J. Will Fountain, that are unacceptable to the Conservancy. In considering this comment it is important to note that the design of the Civic Park is an ongoing process in which its design has evolved and will continue to evolve in response to public input and more detailed design considerations. See also Response No. 14-7. In response to comprehensive public input, subsequent to the release of the Draft EIR, the park designers have concluded, on a preliminary basis, that the Arthur J. Will Fountain should be retained in its current location. Notwithstanding, it is important to note that the conclusion of a significant impact must remain as the actual extent of the significant impacts to the park is dependent upon the Civic Park's final design and that the possibility remains that the fountain may need to be modified in a manner that is not consistent with the Standards (Draft EIR, Vol. 1, Section IV.D, page 489). It is also important to note that in the event that the fountain is retained or modified in a manner consistent with the Standards, that this possible outcome has been disclosed and analyzed in the Draft EIR. Therefore, the retention of this feature would not alter the conclusions of the Draft EIR. The Conservancy's views on the importance of retaining the fountain in its current location are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 14-9**

The comment states that the steps and terraces shown descending into the Civic Park from Grand Avenue appear to necessitate the relocation of the Arthur J. Will Fountain. The Conservancy in this comment also expresses support for a new grade level plaza that would overlook the new park and supports new steps and landings on either side of the existing fountain that would create a dramatic sense of entry. The Conservancy also states that the design of the staircase would preserve the symmetry that is an important aspect of the Paseo's historic Modernist design. The Conservancy's support of the staircase design is appreciated since the creation of a distinguished entrance from Grand Avenue is an important goal of the Project. The design of the park is an ongoing process in which the park's designers need to balance the interests of good design, accessibility, and preservation, to the extent feasible. The interests of the Conservancy regarding the staircase are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 14-10**

The Conservancy's comment states that the loss of all of the historic circulation paths, retaining walls, and elevator closures would remove significant historic fabric and eliminate the park's Modernist history, which is now intact. The Conservancy states that the meandering walkways and amorphously shaped lawn area do not respond to the Project's stated goal of finding design solutions that work with the Modernist design of the County Buildings. In its concluding comment 14-16, the Conservancy summarizes its view on this issue by concluding that the pedestrian circulation system should be retained "in concept, respecting the linearity and axiality of the historic design". With respect to the identified character defining park feature of the circulation system (concrete walkways and open space)shown in the Draft EIR, the Conservancy and the Project's historical resources consultant may have some difference of emphasis, or opinion as to what degree of alteration of the pedestrian circulation system could lead to a significant impact. It is the opinion of the Project's historic resources consultant that with the retention of the park's key character-defining features identified in the Draft EIR, a possible loss of the original circulation paths would not compromise the overall integrity of the Civic Center Mall to a level that would make the property ineligible for California Register listing. The possible removal of the cross-axial plaza and pedestrian circulation paths between the mall facing entrances of the County Hall of Administration and the Courthouse are of note, however, it is anticipated that the final design of the basic walkway plan proposed within the park would sufficiently emphasize the continuity of its distinctive historic characteristics while acknowledging the new changes, and that, overall, , enough of the physical characteristics of the pedestrian circulation system that convey its historical significance and justify its inclusion in the California Register would be retained in the Civic Park's final design. The Conservancy's

concerns on this issue and their interest in these features as a way to respect the linearity and axiality of the current mall's design will be incorporated into the Final EIR and provided to the Project's decision makers for their review and consideration before any action on the Project.

**RESPONSE NO. 14-11**

The Conservancy's comments concur with the Draft EIR's identification of the seven architecturally specific character-defining features of the park that support its individual eligibility for California Register designation. However, all of these features are not identified in the Draft EIR as key features, the modification of which not in accordance with the Standards would create a potentially significant historical resources impact. The comment also indicates that key features should be retained in place to the extent possible, particularly the fountain. See Response No. 14-9 for discussion on the fountain. The Conservancy's comment also expresses agreement that the proposed changes in the spiral ramps and the loss of the current stairs to Grand Avenue would not lead to significant impacts. See Response No. 14-10 for a discussion of the Conservancy's view that the historic circulation plan in the Paseo is important, particularly that the "symmetry and linearity of the existing design be respected and the cross- axial plaza area" between the Hall of Administration and the Courthouse be retained while accommodating changes to the east and west sides to increase accessibility. The dynamic quality of this cultural landscape is balanced by the continuity of distinctive character defining features retained over time. Even under the proposed Project, the property can still exhibit the continuity of form, order, use, features, and in some instances, materials, all of which are qualities that define the site as eligible for the California Register. With respect to the Conservancy's view that many of the mature trees, particularly on the north and south edges of the site should remain,. . the current approach to the park includes the retention of the mature trees currently in the park to the extent feasible. Furthermore, a landscaped public area with mature trees and plantings is part of the historical significance of the site; therefore, this aspect of the park should be and would be retained under the proposed Project.

**RESPONSE NO. 14-12**

The comment expresses support for a modified version of Alternative 4. According to the comment, Alternative 4 would meet the Conservancy's goal of retaining the Paseo's historic character and eligibility for listing in the California Register. Alternative 4 is the "Alternative Design" alternative developed in response to the potential significant impact of the Project on historical resources in the Civic Park and the significant view aspects for locations south of Parcels L and M due to the position proposed for the towers on those parcels. Under this Alternative, the Draft EIR concludes there would not be a significant impact on historic

resources. The Conservancy's support of a modified version of this Alternative, as discussed in its Comment 14-13, is incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 14-13**

The Conservancy expresses the concern that "an artificial nexus" is created between the design of the Civic Park and the placement of the two towers on Parcels L and M-2. The conclusion that the towers on Parcels L and M-2 bear a relationship to the historical significance of the Civic Center Mall is a misunderstanding of the statement in the Draft EIR. The intent of the Draft EIR is to state that there is no relationship between the placement of the towers to the historical character of the area, or to any aspect of the Civic Park. These two changes to the Project were grouped together so as to present in one alternative, an alternative design to the Project responsive to two important but distinct potentially significant impacts of the Project as proposed. The Alternative Design alternative proposes a way to avoid two identified potential impacts of the Project. It is within the purview of the Project's decision-makers to approve the Project as proposed or through some combination of the alternatives presented in the Draft EIR.

**RESPONSE NO. 14-14**

The Conservancy expresses its support of the preservation-oriented Alternative 4 in meeting its preservation goals. The Conservancy is correct in referencing the Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes*. The Secretary of the Interior's *Standards for the Treatment of Historic Properties*, as well as the *Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* and the *Guidelines for the Treatment of Cultural Landscapes* were utilized in preparing the Draft EIR historic resources technical report (Draft EIR, Vol. 3, Appendix C). Additionally, the National Park Service (NPS) publications entitled *Preservation Brief No. 36: Protecting Cultural Landscapes* and *How to Apply the National Register Criteria for Evaluation* were also used in the CEQA analysis of the Civic Center Mall, but not included in the bibliography.

In particular, the *Guidelines for the Treatment of Cultural Landscapes* were utilized in the understanding and assessment of the Civic Center Mall's existing conditions, site analysis and evaluation of integrity and significance, development of a management philosophy and strategy for ongoing maintenance and rehabilitation work, and recognition of the landscape's ever-changing nature over time. While the *Standards* recognize the site's relative significance in history, it also acknowledges the need to balance change and continuity in the landscape resource. Overall, the *Standards* stress the need to retain the landscape's historic character while

allowing for change to meet continuing or new uses. It was this guidance and the recommendations provided herein that assisted in the Project's impact analysis and the development of appropriate and feasible mitigation measures.

The omission of these documents from the Draft EIR Bibliography has also been corrected. These additional references are presented in Section IV, Corrections and Additions of this Final EIR.

**RESPONSE NO. 14-15**

The comment expresses that the Conservancy could also support Alternative 2, a No Project alternative, which proposes no work on the Civic Center Mall, but has focused its comments on Alternative 4 as discussed in earlier comments due to the great value it sees in increasing the Paseo's visual and physical accessibility from the street and the incorporation of open space on the lots between Hill and Spring Streets. The Conservancy's comments are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 14-16**

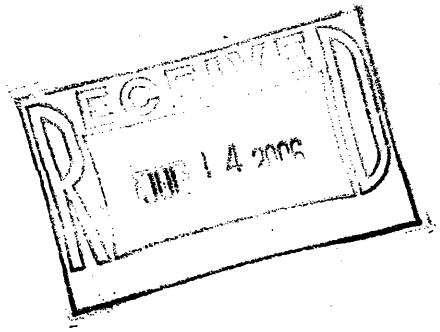
The comment provides a summary of the opinions of the Conservancy as expressed in detail throughout their letter with regard to the manner in which the Project is implemented, with particular focus on the Civic Park. For example, the comment indicates the Conservancy's support of the inclusion of the Civic Mall as part of the Project and the Project's intent to allow more people to discover and use the Paseo as a great City resource. The comment also expresses concern with regard to the removal of existing features within the Paseo, which would impact the recognition of the Paseo as an important part of the City's history. The comment also expresses the Conservancy's opinion that it sees many failings in the Conceptual Plan for the Civic Park as presented in the Draft EIR with regard to Grand Avenue and Hill Street. According to the comment, improvement in accessibility and the consequent alterations and new construction may, but do not need, obliterate what is there. The comment also states that the Secretary's Guidelines for the Treatment of Cultural Landscapes allow for substantial interventions when they are made in conjunction with significant preservation, and that it is the Conservancy's hope that such would occur as the Conceptual Design is refined. As previously stated, ongoing changes in the Project's design are occurring and will continue to occur (please refer to Response No. 14-7) and that the Authority hopes that the Conservancy continues with their participation in the design process.

The comment also states the Conservancy's position that the fountain and pools and the granite-clad elevator enclosures should be maintained *in situ*; the granite-clad planters and retaining walls, the mature trees on the north and south edges of the park, and the light poles and speaker poles be maintained *in situ* and/or relocated to meet the needs of the new design; and that the pedestrian circulation system be maintained in concept to respect the linearity and axis of the park's historic design. These summarized concerns have been addressed specifically in the responses to the individual comments in this letter. The interests of the Conservancy in implementing this position are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

Letter No. 15

MUSIC·CENTER
PERFORMING ARTS CENTER
OF LOS ANGELES COUNTY

July 13, 2006



Martha Welborne
Managing Director
Grand Avenue Committee
c/o California Community Foundation
445 South Figueroa Street, #3400
Los Angeles, CA 90071

Bruce Lackow
Principal
PCR Services Corporation
233 Wilshire Boulevard, Suite 130
Santa Monica, CA 90401

Re: The Grand Avenue Project – Response to the Draft E.I.R.

Dear Martha and Bruce:

I am writing on behalf of the Music Center of Los Angeles County, including our resident companies: the Los Angeles Philharmonic Association, the Center Theater Group of Los Angeles, the Los Angeles Opera and the Los Angeles Master Chorale.

First let me state that all of us at the Music Center are fully supportive of the Grand Avenue Project. We are certain that the project will bring enormous economic, social, civic and cultural benefits to the Los Angeles region. And, we are certain that the project as conceived will be a positive for cultural organizations Downtown. The Grand Avenue Committee and The Related Companies have been conscientious in seeking our views and we appreciate that. 15-1

The Music Center and the Project have a unique relationship. As Los Angeles' leading arts institution – serving close to 2 million patrons a year – the Music Center is situated directly across the street from the Grand Avenue Project. One of our venues, Walt Disney Concert Hall, home to the Los Angeles Philharmonic and the Los Angeles Master Chorale, will be at ground zero for Project impacts between 1st and 2nd Streets along Grand Avenue. The rest of the Music Center campus – including the major parking facility – sits directly across from the proposed Civic Park. Indeed the Music Center

Plaza is conceived as being integral to that Park complex. So, while we applaud the Project and look forward to its completion, we must take steps to assure that project impacts relative to construction disruptions, access, traffic and noise are thoughtfully mitigated with special involvement from and timely consultation with representatives from the Music Center. 15-1

The Music Center, with its four venues and plaza, is an active performing arts, educational and community center that is busy from early morning to late at night 365 days a year. The business of the performing arts and related educational programming involves access by patrons via all modes of transportation; regular pedestrian access; frequent large convoys of school buses; and large vehicular traffic bringing sets, equipment and supplies. Two of the largest civic-center parking complexes sit beneath our buildings. As such vehicular and pedestrian access to our facilities during construction will be of major concern to us. 15-2

Of course, as a performing arts center, construction noise is of concern as well. We were able to work through these concerns while building Walt Disney Concert Hall and the recent Grand Avenue Street improvements. But we know that heavy impact or sustained, high pitched construction noise can impact rehearsals and performances. Advance planning and preparation can allow the Project managers and Music Center representatives to work together to mitigate the adverse impacts upon Walt Disney Concert Hall and our other venues. 15-3

I want to keep our points simple and direct and will avoid section-by-section referencing of the report which would be repetitive. We hope and expect that the Grand Avenue Committee and Related Companies will embrace our recommendations for a cooperative effort.

With respect to the impacts of construction and eventual operations upon access, parking, street closures, traffic disruptions and related **traffic and circulation** impacts, the Music Center strongly urges that the governing authority require the formation of a standing working committee comprised of Music Center representatives (including LA Phil representatives) and appropriate Project construction managers. The purpose of this committee will be to assure that the Music Center is regularly consulted well in advance of the preparation of specific mitigation plans and that there is close, collegial and cooperative communication between Related and the Music Center on a day-by-day basis during construction so we mutually work around problems that we may create for each other. 15-4

We are also concerned about impacts from **noise**. We operate world class performance facilities. It might not be apparent, but performances, rehearsals, technical sound preparations and the like are going on all the time; from early morning until late at night.

15-5

While Disney Hall and the other venues are designed to insulate the performances from the world outside, we have learned that high levels of external noise, rumbling and reverberation may interfere with the performing, rehearsing and technical work in the theaters. We believe that with thoughtful and cooperative advance planning we can mitigate all or most of these potential problems. The working committee that we have recommended can also address these noise concerns.

In nearly every one of the proposed mitigation measures in the report there is a requirement that "prior to the start of each construction work phase..." Related and the Civic Park parties submit the specific mitigation plan(s) to the appropriate City and County authorities. While each of the mitigation measures does require that the Music Center (which includes Walt Disney Concert Hall) be given a copy of the specific mitigation plan, we believe that this is not sufficient nor in the best interests of all parties. The Music Center's unique location relative to the Project, our mission and our strong need to preserve access for our patrons, calls for a level of regular, timely and meaningful communication. This ought to take place on a regular basis so as to allow Related and the Civic Park developer to take the Music Center's requirements into their construction planning and to help shape the specific mitigation plans. I should note as well that the Music Center's normal operations have the potential to impact the Project construction. With advance planning we may be able to avoid such impacts.

15-6

We know that plans can be affected by the day-to-day realties of construction. We are realistic about this. Our principal concern is that there be an established, working mechanism for communication between the developer and the Music Center so that we can all avoid surprises. The fact is that the drama and impacts of the Grand Avenue Project will play out right in front of Disney Hall on a daily basis over several years. In our view, the establishment of a working committee, with regular participants, will facilitate the sort of collegiality and cooperation that can solve problems when they arise and minimize the negative impacts. The communications can develop into a mix of face-to-face interaction and e-mail or phone contacts. It will save time and cost over the long run.

I have every reason to believe that the Grand Avenue Committee, led by Martha Welborne, will embrace our recommendation and that, together, we can prepare a plan to establish such a working committee to be incorporated into the Final EIR. 15-6

Thank you for your attention to this matter.

Sincerely,

Stephen D. Rountree
President

SDR: es

cc: Supervisor Gloria Molina
Councilwoman Jan Perry
David Janssen, Chief Administrative Officer, County of Los Angeles
Deborah Borda, President, Los Angeles Philharmonic
Charles Dillingham, Managing Director, Center Theatre Group of Los Angeles
Mitch Heskel, Operations Director, Los Angeles Opera
Terry Knowles, Executive Director, Los Angeles Master Chorale
John Emerson, Chairman, Music Center Board of Directors

**LETTER NO. 15**

Music Center
Performing Arts Center of Los Angeles County
Stephen Rountree
President
135 North Grand Avenue
Los Angeles, CA 90012

**RESPONSE NO. 15-1**

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR on behalf of the Music Center of Los Angeles County and its resident companies. The Grand Avenue Authority appreciates the Music Center's support of the Grand Avenue Project as a positive influence for downtown cultural organizations and its acknowledgement of the efforts of the Grand Avenue Committee and Project Developer to seek the views of the Music Center.

.In your comment letter on the Draft EIR, you suggested the formation of a working committee that would meet and/or communicate on an as needed basis to address issues concerning construction noise and traffic and any attendant impact on the Center's performances and related activities. As you say in your comment letter, the purpose of the working committee would be to assure that the Music Center is regularly consulted in advance concerning the interplay of the Project's construction activities and the continued operations at the Music Center. Based on recent meetings between representatives of the Authority, the developer and the Music Center, all parties are committed to a process where the developer and the Music Center meet on an ongoing basis to exchange all necessary information and formulate programs so as to best ensure that the Center's activities would not be significantly disrupted by the construction of the Project. Staff for the Authority will recommend to the Authority's Board that it include an appropriate condition in any resolution approving the Project that would obligate the developer to lead such a coordination and communication process.

**RESPONSE NO. 15-2**

The comment raises concerns about vehicular and pedestrian access to the Music Center during construction. Direct access to the Music Center's facilities (i.e. parking driveways and pedestrian entrances) would not be impacted by the Project, as they would all remain open and

unimpeded. The Draft EIR addresses traffic impacts during construction (pages 253-257of Volume 1 of the Draft EIR), and also identifies mitigation measures to minimize construction impacts (pages 317-318 of Volume 1 of the Draft EIR) including the development of a Construction Traffic Control/Management Plan (to be approved by LADOT), which would also address the adjacent land uses to the proposed Project, including the Music Center.

**RESPONSE NO. 15-3**

The comment raises concerns about the potential impact of construction noise on the Music Center. The Draft EIR analyzed potential construction noise impacts and identified potentially impacted sensitive receptors, including the Los Angeles Music Center (Draft EIR, Vol. 2, Section IV.G, Noise, pages 577 and 578). As discussed in the Draft EIR, the Project's construction activities would exceed threshold levels at adjacent sensitive land uses thereby resulting in a significant impact (Vol. 2, Section IV.G, Noise, pages 588-589). During construction, the higher noise-producing activities are anticipated to occur for one to two months during demolition, between four and five months during excavation, and for brief durations during building construction. The Project would implement all feasible mitigation measures to reduce impacts, including, but not limited to, the placement of 8-foot-high sound attenuating fencing (Mitigation Measure G-3), quieting factors of 10 dBA on pile drivers (Mitigation Measure G-4), designation of a construction liaison between the Project and surrounding uses who would implement remedial measures (Mitigation Measure G-7). In addition, refer to Response No. 15-1 with regard to the process the Authority is seeking to implement with regard to entering into a cooperative program with the Music Center to coordinate Project construction activities with the scheduling needs of the Music Center so that construction noise impacts can be further reduced to the greatest extent feasible. Your reference to the successful coordination in the past with construction of the Walt Disney Concert Hall and the Grand Avenue improvements projects adjacent to the Music Center is appreciated, and another cooperative effort is anticipated for this Project as well.

**RESPONSE NO. 15-4**

This comment raises concerns about traffic and circulation impacts both during construction and operation. Please refer to Response No. 15-1 with regard to the process the Grand Avenue Authority is seeking to coordinate construction activities with the scheduling needs of the Music Center so that Project construction traffic and circulation impacts can be further reduced to the greatest extent feasible. The County will continue to control the Civic Park directly or through an operator, and continued event coordination such as now occurs for mall events can be anticipated to maximize the success of all venues.

## RESPONSE NO. 15-5

This comment raises concerns about noise impacts. The comment states that the Music Center is an active, year-round performing arts educational and community center, from early morning until late at night. As previously discussed, it is the intention of the Authority to reduce construction noise impacts to the greatest extent possible through the implementation of several construction noise mitigation measures. It is also the intention of the Authority to require the developer to meet with the Music Center and to actively coordinate construction activities with the needs and scheduling of programs and activities at the Music Center.

Mitigation Measures G-1 through G-7 (pages 603-605 of Volume 2 of the Draft EIR), which would be implemented in addition to active coordination of Project construction activities, have been developed to reduce construction noise levels at nearby sensitive receptors, which include the Walt Disney Concert Hall and other buildings within the Music Center. For example, during the initial stage of each construction phase (site demolition and site preparation/excavation) for each Project parcel, and when construction activities are within 200 feet of noise sensitive land uses, a temporary, 8-foot, ½-inch-thick plywood fence shall be erected along the boundaries of each construction site adjacent to the noise sensitive uses such that the "line of sight" between on-site construction activities and the other sensitive uses is blocked, where feasible. In addition, during each construction phase, pile drivers within the individual activity/development site under construction at that time shall be equipped with noise control devices having a minimum quieting factor of 10 dBA, as well as locating construction loading and staging areas within each respective construction site and away from noise-sensitive uses to the extent feasible. In addition, during each construction phase, a construction relations officer who is responsible for responding to any concerns regarding construction noise shall serve as a liaison between the Project managers and surrounding property owners. The liaison shall coordinate with the Project construction manager(s) to implement remedial measures in the shortest time feasible.

## RESPONSE NO. 15-6

The comment requests regular and meaningful communication during the construction process to minimize impacts of the Project on the Music Center and the impact of the Music Center operations on the Project's construction. Due to the unique proximity of the Music Center to various components of the Project, it is the intention of the Authority to address the concerns of the Music Center in a cooperative manner through direct meetings and through the coordination of construction scheduling. The intent of coordination is to mutually work around problems of disruption that may be created by construction activities and to reduce construction

impacts to the greatest extent feasible. The cooperative effort would create a working mechanism for communication between the developer and the Music Center. The day-to-day coordination of activities would create an understanding of the mutual needs of the Project and the Music Center, to the benefit of both. See also Response No. 15-1.

Letter No. 16

**From:** Joyce Dillard [dillardjoyce@yahoo.com]
**Sent:** Thursday, August 03, 2006 3:30 PM
**To:** Grand Avenue Committee
**Subject:** Grand Avenue EIR Comments Due August 3, 2006

Grand Avenue EIR Comments Due August 3, 2006

The Civic Park in any of the plans should remain in the public as is the land ownership and current governance. Under no circumstances should the governance be privatized in any way, shape or manner including the formation and/or use of a public non-profit corporation. No programs in other states should be substituted as examples of governance in our City.

Our heritage is of a Spanish system through the Mexican government. Eastern cities, like New York, grew on a British system of governance, without the focus on the Ciúdad or city. The land use was much different. The Plaza Church is the true center of the City of Los Angeles, and consequently, the County of Los Angeles. The Four League measurements (four corners of the city) emanated from the Plaza Church. This park, Paseo de los Poblosdores Park is the journey outward and not the main focal point of Los Angeles.

16-1

Today, we consider Downtown LA as the center of the city, but the historical perspective must be retained.

The governance of the Civic Park should be retained in the public domain as a County Parks and Recreation asset or a City Recreation and Park asset with a Park Advisory Board who can guide usage for events and activities. The Ralph M. Brown Act can allow the public an input on park issues.

A public non-profit corporation is excluded from the Ralph M. Brown Act law which would disenfranchise the resident user.

The value of parks is most clearly stated by J.F. Mendenhall in the Office of the Commissioners of City Parks Report of the Superintendent from December 12, 1901:

I quote from a former report, There is no expenditure of money for a public improvement of any kind, aside from a good supply of pure water,

well-paved and well-kept streets, and good schools, that pays so well as public parks. This is a recognized fact in all parts of the world, and there is no idea spreading so fast and taking such deep hold upon the people of this County as the Park idea. People flock to the parks if they have but an hour for recreation, and its is to our parks the stranger is always first taken that we may impress him in the most favorable manner as to the beauty of our City and its surroundings, as well as to inform him of the enterprise and cultivated tastes of our people.

And our people in Los Angeles are varied from origin of ancestry, language, culture and tastes. Here, this park can reflect a welcome mat to our residents and to our visitors.

Quoting from J.F. Mendenhall from the Office of the Commissioners of City Parks Report of the Superintendent from December 12, 1901:

In conclusion we wish to impress upon the minds of our citizens, every man, woman and child, that public parks are owned by them. This ownership should be fully realized and every one should be brought to feel that they are heartily welcome to enjoy to the fullest extent all the benefits such grounds afford, subject only to such rules and regulations as are indispensable, both for their protection and the proper maintenance of the property. We wish the people to know that this is the first aim and end of the Park Department, and that only by such cooperation can the full blessings of the parks be enjoyed.

16-1

Superintendent J.F. Mendenhall stated in the December 11, 1901 Office of the Commissioners of City Parks Report of the Superintendent :

The increase in attendance of visitors to the parks has been gratifying. As greater advantages for picnic resorts and pleasure grounds are provided, the people find their interest increased, and the parks have become an attraction to all classes. Instead of being a mere luxury for the special benefit of the rich they are pleasure grounds for the poor and are the cheapest luxury a city can enjoy.

In looking over the history of the past few years we find that public parks, as now conducted, are of modern conception. In the year 1855 New York City purchased 800 acres north of 59th street, at that time quite a distance in the country, and the foundation of the renowned Central Park was laid. The example set by the City of New York, in the creation of Central Park has fulfilled a mighty and truly civilizing mission,

surpassing by far the most sanguine hopes and predictions of its far seeing founders. It has given rise to a chain of public parks and boulevards encircling, as it were, all centers of wealth and population in the country. Before this purchase the famous Boston Common, consisting of 48 acres, was the only public park worthy of mention in the United States. The Common was originally designed as a cow pasture for the benefit and convenience of the public in the early days of Boston Town. The good citizens of Boston could not agree as to the measure of its disposal and it was retained as a play ground for the children, and a practice ground for the militia on training days, and all idea of disposing of it for utilitarian purposes was forever abandoned. I had the pleasure of visiting this park, or play ground, 27 years ago, and just before the era of improvement began. About this time Boston purchased additional ground, and from time to time kept adding to the park area until the present time, which now embraces 2378 acres, and the expenditures in the past 27 years has been over $18,000,000. The park area of Los Angeles is 3737 acres, and the total expenses to this date has (sic) been about $620,000. A conservative estimate of the park land, without the improvements, would be $780,000. This value appears to be increasing at a greater rate than the annual expenditures of the Park Department. What would be the value of our park land at this time if park development had been entirely neglected in the past few years?

16-1

The history of the marvelous development of many of the leading cities of the United States is intimately interwoven with that of their Public Parks, the material and moral force of which has been a powerful factor in the increase of population and enhancement of values of real estate.

The ownership and development of a Public Park is the cheapest luxury a city can enjoy, because the thing itself creates the very wealth from which its cost is paid.

A suitable and attractive system of Parks and Boulevards is of great and unmeasurable (sic) advantage to any city, in the promotion of the health, happiness, culture and well-being of its citizens and in its attractive power to draw to itself constant accessions of cultivated and agreeable people from other parts of the Country---- He who plants a tree works for posterity.

Posterity should be the key in design of the Park.

With that, the modern era of design should be considered historical in nature. The fountain should be restored. Because of increased costs and liabilities, splash fountains have replaced those earlier designs. The pools should have the same consideration. We should restore and honor that work and keep it in its original place.

As a user of this park, the pink granite marble works for the area.

16-2

This park acreage is 16 acres small but critical to the Central City. Commercialization is NOT the key to a successful park. We have shopping areas to satisfy that greed.

According to this EIR document, The intent of the Civic Park is to revitalize activity and with improved public facilities and enhanced security.

This area is also close to the Pasadena Freeway, not known as the Arroyo Seco National Scenic Byway. This is a gateway to the northeast section of Los Angeles, the Los Angeles River and the Arroyo Seco. That Arroyo Seco identity is one of greenery and open space. This is historical in nature and a point of tourism with its Museums of the Arroyo Seco.

The modern era design of the Grand Avenue Streetscape Plan needs to take into account that Spanish and Victorian eras and honor it with some aspect of the design from those eras as a flow through to the Arroyo Seco.

Rename the park PASEO DE LOS POBLOSDORES PARK and connect TWO grand avenues!

16-3

No where do you mention the work of the Integrated Resources Water Management Plan (IRWMP) in its twenty year vision in progress of water assessment, water quality and watershed. How is this Environmental Impact Report integrated with that work? This park can utilize methods of conservation and reuse. How do you plan to integrate the IRWMP goals into this report? Please refer to the website:

www. lawaterplan.org

16-4

On page 62 of Volume I, the word METHANE is used, but in relationship to testing. In Volume II, page B-16 under Hazard and Hazardous Waste; you consider the impact Less Than Significant Impact. About 35 years ago, my husband was a construction worker building the Hall of Records at Temple and Broadway. They hit oil.

16-5

Where is that mitigation mentioned? Is there an ongoing monitoring of methane gas already? Is there a cover-up? 16-5

How safe is the park with an underground area of oil resource? Where is your research of the Environmental Impact Reports from the surrounding buildings in the plan?

HOW SAFE IS THE AREA FOR CHILDREN? 16-6

Greenbuilding has not been considered in this document? Why was that alternative disregarded for this project considering it is in the boundaries of a City that is part of the LEEDS program? 16-7

The entire project is very adult in concept. Where is the integration of Downtown LA?
Where in this design is the inclusion of children and families and their needs, especially during the weekends? Where are the weekday jurors and court employees needs taken into consideration? Can all cultures reflected in today s Los Angeles feel welcome and not excluded? To quote Superintendent J.F. Mendenhall, where is plan for the enterprise and cultivated tastes of our people ? 16-8

The concepts lack a vision of inclusiveness. The impacts are more than significant, require mitigation and proper planning and should be reflected in this Environmental Impact Report. 16-9

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

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## LETTERS FROM INDIVIDUALS

## LETTER NO. 16

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

### RESPONSE NO. 16-1

Thank you for your interest in the Project and comments regarding the ownership and governance of the existing Civic Center Mall. The comment states that the Civic Park should not be privatized or operated by a public non-profit corporation. As under existing conditions, the Civic Park would remain under the jurisdiction and authority of the County of Los Angeles. The County may engage an operator in the future for the revitalized Civic Park, and that operator could be a non-profit agency.

The comment expresses interest in the Spanish heritage of the City and the location of the Plaza Church as the true center of the City. As stated in the comment, today, downtown Los Angeles is considered the center of the City, but the historical perspective must be retained. The Draft EIR addresses the historical and architectural importance of the Civic Center as a civic and cultural center of the City (Draft EIR, Vol. 1, Section IV.D, Historical Resources, page 443).

The comment further expresses the concern that the governance of the Civic Park should be retained in the public domain as a County or City asset, with a Park Advisory Board that can guide events and activities. As previously stated, the Civic Park would remain under the jurisdiction and authority of Los Angeles County. The Grand Avenue Committee has recently sponsored public workshops (June 21, 2006, August 19, 2006 and October 7, 2006) to encourage public participation in the design and future use of the park. As described in the Draft EIR, a goal of the Project with respect to the Civic Park is to create an active, welcoming setting for daily activity as well as a gathering place for community celebrations (Draft EIR, Vol. 1, Section II, Project Description, page 97).

The comment states the concern that a public non-profit corporation would exclude public participation. However, as a continuing public facility, public input and participation in the ongoing management of the Civic Park would be assured under applicable laws.

The comment also expresses support for a park that can reflect the varied origins, ancestries, and cultures of the City of Los Angeles. This comment supports the goal of the Project to provide a gathering place for cultural and ethnic celebrations and festivals (Draft EIR, Vol. 1, Section II, Project Description, page 97). The comments in the letter in support of public parks are consistent with the goal of the Project to create welcoming public open spaces that would create, define, and celebrate the Civic and Cultural Center as a regional destination (Draft EIR, Vol. 1, Section II, Project Description, page 95). Your views on the park will be incorporated into the Final EIR for review and consideration of the public agency decision makers prior to any approval actions on the Project.

**RESPONSE NO. 16-2**

The comment states that the modern era of design should be historical in nature and expresses the opinion that the fountain should be retained. The Draft EIR evaluated the historical context of the Civic Park and the surrounding Civic Center and made conclusions based on the historical and cultural value of the area, including the Civic Center Mall (please refer to Draft EIR, Vol. 1, Section IV.D, Historical Resources). The design of Civic Park is an on-going public effort and, in this regard, is continually evolving. Based on extensive public input during recent workshops, some of the existing park elements would likely be preserved, including the Arthur J. Will Memorial Fountain, the view of City Hall, and passive and quiet spaces. It is the intent of the Civic Park plan to retain as many of the character-defining historical features of the Civic Center Mall, as feasible, while providing a landmark park that signifies the diversity and regional importance of downtown Los Angeles. As described in the Draft EIR, no significant impacts with respect to the fountain would occur if it no longer served as a focal point for the park (Draft EIR, Vol. 1, Section IV.D, Historical Resources, page 489). Your interest in the retention of the fountain in its current location and pink granite fixtures are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 16-3**

The comment expresses the concern that the intent of the Civic Park is to revitalize activity with improved public facilities and enhanced security. It is the intent of the Civic Park plan to retain as many of the character-defining historical features of the Civic Center Mall, as

feasible, while providing a landmark park that signifies the diversity and regional importance of downtown Los Angeles. Although vendors may participate in park activities to create and improve ambience associated with various festivals and other civic activities, it is not the intent of the park to support commercialization that would detract from the function of its primary purpose as a civic open space.

The comment also discusses the proximity of the Civic Park to the Pasadena Freeway, now known as the Arroyo Seco National Scenic Byway, and describes how the Arroyo Seco's identity is one of greenery and open space and, that by maintaining its historical identity, the Arroyo Seco has been a point of tourism with its museum and other historical features. The comment also suggests that the design of the Civic Park take into account its historical context and honor the City's Spanish and Victorian eras with a flow through to the Arroyo Seco. The comment also suggests that the park be renamed "Paseo de los Poblosdores Park" and connect two grand avenues. The reference to "two grand avenues" is assumed to be Grand Avenue and the Pasadena Freeway (also known as the Arroyo Seco National Scenic Byway). The existing Civic Center Mall is named El Paseo de los Pobladores de Los Angeles , which would continue to be used to refer to the existing mall area. The Project supports the comments in that it would maintain the historical context of the Civic Mall while enhancing its use as a public open space that would create, define, and celebrate the City's civic and cultural center. The Project would also tie the Civic Park to the historical area north of the Hollywood Freeway, through the Grand Avenue streetscape improvements to Cesar E. Chavez Avenue. Attention to the historical integrity of the Civic Center Mall, as described in the Draft EIR (Vol. 1, Section IV. D, Historical Resources, pages 467-468 and 481-488), would contribute to the historical value of downtown Los Angeles and the surrounding area. The Pasadena Freeway, which begins just to the west of the Project, follows the Arroyo Seco, a tributary of the Los Angeles River running between Interstate 5 and the City of Pasadena. Although the Arroyo Seco terminates at the Los Angeles River, the Pasadena Freeway continues through the Elysian Hills, north of the Hollywood Freeway and, thus, forms a scenic byway created by the City's hilly terrain. The Arroyo Seco Park is located at the boundary of the City of Los Angeles and South Pasadena, approximately eight miles from downtown Los Angeles. Through enhancing the linkage between historical uses to the north and south of the Hollywood Freeway, the Grand Avenue streetscape program enhances connectivity to the Arroyo Seco National Scenic Byway and, thus, to the Arroyo Seco Park. Your comments are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

**RESPONSE NO. 16-4**

The comment asks about the IRWMP. The Greater Los Angeles County Integrated Resources Management Plan (IRWMP) is currently in its preliminary planning stage. Currently,

the IRWMP has no established policies, except for the intent to contribute to regional water conservation efforts. Since there are no specific policies or an adopted plan, there is no basis by which a discussion of the plan can be incorporated into the Draft EIR. However, the Los Angeles Department of Water and Power (LADWP), a participant in the California Urban Water Conservation Council (CUWCC), is the purveyor of water to the Civic Park. Under the LADWP Urban Water Management Plan (2005), the LADWP implements numerous water re-use and conservation measures in accordance with CUWCC Best Management Practices for the reduction of water demand.

**RESPONSE NO. 16-5**

The comment asks about the presence of methane gas on the site and mentions oil being found during construction of the Hall of Records. The Initial Study for the Grand Avenue Project (October 2005) acknowledged that the Project site is surrounded by several oil fields, including the Los Angeles City Oil Field, north of the Project site. This field is located in the vicinity of Sunset Boulevard and the Hollywood Freeway. Other oil fields in the area include the Union Station Oil Field, located east of the Project site, in the vicinity of Alameda Street; and the Los Angeles Downtown Oil Field, located west of the Project site in the vicinity of STAPLES Center. According to Division of Oil and Gas and Geothermal Resources (DOGGR) records, the Project site is not located within an oil field or an oil drilling area. This information is reiterated in the City of Los Angeles Safety Element Oil Field and Oil Drilling Area map. Furthermore, there is no record of oil having been recovered in any of the excavation sites for the Civic Center. However, due to the proximity of active and formerly active oil fields to the Project site, trace amounts of oil may occur due to a variety of reasons, none of which would indicate the presence of a productive or former oil field. The greatest hazard associated with oil production sites (fields) is the presence of naturally occurring methane. In this regard, the Project site is located outside any City of Los Angeles "Methane Zones."[11] On these bases it is concluded that there would be a less than significant risk of encountering hazardous materials or potentially hazardous materials during Project construction. However, to assure additional safety, Regulatory Measure H-2 in the Draft EIR, which involves testing for the presence or absence of hydrogen sulfide and methane beneath the site by subsurface sampling, would be required at all excavation sites. Should the sampling result in the discovery of hydrogen sulfide and/or methane, appropriate health and safety measures would be implemented, in accordance with applicable regulations. The City's Department of Building and Safety, or other appropriate City agency or department, shall determine compliance with this measure.

[11] *Oral communication with Genevieve Proctor of Iris Environmental, March 30, 2006.*

**RESPONSE NO. 16-6**

The comment raises the question of safety if there is underground oil. As previously discussed in Response No. 16-5, the park would be unsusceptible and protected from geologic hazard, including oil and methane gas. As such, the area would be safe for any of the City's citizens, including children. Please refer to Response No. 16-5.

**RESPONSE NO. 16-7**

The comment asks about "greenbuilding" and refers to the City LEED program. CEQA does not require the evaluation of LEED programs with respect to a specific project in its environmental evaluation. In addition, the decision to implement LEED programs in a building design would occur during the design stage and would be up to the discretion of the developer. The Project would be required to comply with the requirements of Title 24 of the California Code of Regulations, with regard to energy conservation through efficient building design. Title 24 (2005) applies to all new development and establishes standards for heating and cooling efficiency of a building envelope, mechanical systems, indoor and outdoor lighting, signs, residential HVAC and residential water heating. The 2005 updates to Title 24 amended prior performance standards to mandate an energy reduction of 15 percent. The Project would comply with all requirements of Title 24 applicable to the Project's residential and non-residential Project components. With the enforcement of the revised Title 24, which would reduce energy demand by approximately 15 percent compared to former Title 24 requirements, no potentially significant impacts with respect to energy demand are anticipated.

Although the City, which is a responsible agency under CEQA for this Project, requires LEED certification for City developed new public works buildings of more than 7,500 square feet, that requirement does not apply to this Project. The Authority did not require LEED certification in its competitive call for a private developer to propose a mixed-use project for the four publicly owned parcels in downtown Los Angeles now used as surface parking lots. Neither the County nor the CRA/LA nor the City of Los Angeles require private project applicants to use the LEED system.

A project can, as in this case, analyze the Project's impacts on the environment for purposes of CEQA without a requirement for LEED certification. There is no direct correlation between LEED certification and compliance with a stringent building code such as Title 24 of the California Building Code. A number of the categories of analysis covered by the LEED NC version 2.2 rating system for new construction are covered in the design of this Project and are analyzed in the Draft EIR. For example, the credits in the "new construction "category (LEED-

NC Version 2.2 Registered Project checklist) are earned in the following categories: Sustainable Sites, Water Efficiency, Energy & Atmosphere, Materials and Resources, Indoor Environmental Quality, and Innovation and Design. These areas, with the exception of those dependent on final building design plans, are addressed in the Project, its design and analysis for CEQA purposes and in design guidelines for the Project. As the Project's final building designs have not been developed as of this date, a commitment to specific LEED building design measures would be premature and thus, the discussion of specific energy design features would be speculative. See also the discussion of sustainability and the LEED program in Response No. 13-4.

No further analysis of this issue in the Final EIR is required. Your comment that the Project be a part of the City's LEED program will be incorporated into the Final EIR for the review and consideration of the Project's decision-makers prior to any approval action on the Project.

**RESPONSE NO. 16-8**

The comment characterizes the Project as "adult" in nature and asks about inclusiveness for families and others. No information or data is presented in the Draft EIR that would indicate or suggest that the Project would be "adult" in nature. The intent of the Civic Park is to provide an expression of the City's cultural diversity, through a variety of cultural festivals and celebrations. Such activities would be highly attractive to people of all ages and income levels and would be inclusive in nature. Please refer to Tables 5, 6 and 8 in the Land Use section (pages 175-178, 180-183, and 189-192 of Volume 1 of the Draft EIR) for a discussion of the Project's diversity and cultural objectives. With respect to the concern raised in the comment about the needs of courthouse employees and jurors, the Civic Park and mixed-use development would provide many options for break and leisure time activities.

**RESPONSE NO. 16-9**

The comment expresses a view that the Project lacks inclusiveness and that the EIR should include mitigation. The Project's goal and supporting objectives make it clear that the Project is designed to be inclusive. Please refer also to the Draft EIR Land Use section (Section IV.A in Volume 1 of the Draft EIR) for a discussion of the Project's cultural diversity goals. Also refer to Response to Comment Nos. 16-1 and 16-8 for a discussion of the intent of the Civic Park to be an inclusive cultural center that would be inclusive of all of the City's citizens. The Draft EIR discloses a full range of significant environmental impacts and appropriate mitigation measures that would guide the construction and operation of the Project consistent with CEQA.

Letter No. 17

**From:** NatureBase@aol.com
**Sent:** Wednesday, July 19, 2006 11:04 AM
**To:** EIRcomment@grandavenuecommittee.org
**Subject:** A comment

Hi. This project would be a great opportunity to demonstrate how southern California native plants can be used in public landscaping. Native plants use less water, fertilizer (none!) and soil amendments than most ornamental varieties. Native plants also represent our local natural heritage and they provide beauty throughout the year.

Successful large-scale native plant projects already installed include the 7-acre berm around the Donald Tillman Water Reclamation Plant in Van Nuys and approximately 500,000 native plants used for landscaping along the 13-mile MTA Orange Line across the San Fernando Valley.

17-1

The time is right for California natives! Please specify southern California native plants for landscaping this project.

Sincerely,

Steve Hartman
4444 Longridge Avenue
Sherman Oaks, CA 91423

## LETTER NO. 17

Steve Hartman
4444 Longridge Avenue
Sherman Oaks, CA 91423

## RESPONSE NO. 17-1

Thank you for your interest in the Project and your comments on the Grand Avenue Project Draft EIR. The comment states that the Project would be a great opportunity to demonstrate how native Southern California plants can be used in a public landscaping and points out the advantages of native plants with respect to water use, feeding, and soil amendments. The design of the Civic Park has been ongoing, and the Authority has welcomed public participation in the formulation of ideas in the design of the Civic Park. The public has been invited to participate in three community workshops (June 21, 2006, August 19, 2006 and October 7, 2006), to receive the public's ideas. The park designers also welcomed e-mail from the public in this regard. The type of landscaping for the Civic Park has not yet been decided upon, and work is in progress to determine the selection of plant materials. There has been strong public interest in sustainable measures, which would include planting native or low water consuming plants, as well as interest in a demonstration or educational garden, and these options are being considered by the park designers. Your interest in the landscaping of the Project is appreciated and your comments are incorporated into the Final EIR for the review and consideration of the Project's decision makers prior to any approval action on the Project.

THE GRAND AVENUE PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

OPEN HOUSE AND PUBLIC INFORMATION MEETING HELD
TUESDAY, JULY 18, 2006
6:02 P.M.

CATHEDRAL OF OUR LADY OF THE ANGELS
CENTER AT CATHEDRAL PLAZA
MEETING ROOMS 6, 7 AND 8
555 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012

REPORTED BY:
CATHERINE PONICSAN, RPR
CSR NO. 8271

FILE NO. P06621

SPEAKERS FROM THE DAIS:
MARTHA WELBORNE
Managing Director
Grand Avenue Committee
BILL WITTE
The Related Companies
BEA HSU
The Related Companies
BRUCE LACKOW
Christopher A. Joseph & Associates

SPEAKERS FROM THE AUDIENCE:
LINDA VALVERDE
ROBERTO CARBAJAL
SISTER DIANE DONAGHUE
GENERA DOGON
DEBORAH BURTON
SAMUEL SANCHEZ
GILDA HAAS
ALBERTO TLATOA
RUSSELL BROWN
BEN BEACH
ESTHER ALEJANDRO
BENJAMIN TORRES

ALSO PRESENT:
NATHAN SPRINGER
Outreach Specialist
Lee Andrews Group
English/Spanish Translater

JOAN EARLY
Vice President
Lee Andrews Group

ROXI REEVES
Community Outreach
Lee Andrews Group

LOS ANGELES, CALIFORNIA; TUESDAY, JULY 18, 2006
6:02 P.M.

MS. WELBORNE: Good evening, everyone. I think we'd like to get going so we have plenty of time for the meeting.

I'd like to welcome you all here. My name is Martha Welborne. I'm managing director of the Grand Avenue Committee.

The committee -- I think many of you know this, but Grand Avenue Committee acts as staff to the Los Angeles Grand Avenue Authority, which we commonly refer to as the JPA, which is responsible for this project.

It's important for you to know that the Joint Powers Authority is the lead agency for SEQA, and so it's the JPA that will ultimately review and take action on the EIR.

The purpose of the meeting tonight is for us to listen to you. This is not a general community meeting. It's not one of our typical outreach meetings.

Tonight we are focused exclusively on the draft EIR.

The EIR was made available to the public on June 14.

And there are several forms of comment -- of ways for you to comment on the EIR. We are offering this meeting tonight as one additional way.

You can -- if you speak tonight, your comments will be recorded, and will be responded to when we complete the final EIR.

You can also submit comments in writing through the mail, by E-mail, by filling out a comment form tonight.

And these were out on the desk when you checked

in.
Comments are due August 3rd.
And after August 3rd, we will then launch into the drafting of the final EIR.
The process for the evening is that we will start with two brief presentations.
First, Bill Witte, the lead developer from The Related Companies, will give an overview of the project components.
Next, Bruce Lackow, our environmental consultant, will describe the SEQA process, and give a summary of the draft EIR analysis.
After that, we then open the floor to public comment.
To join in on giving us your comments, we would

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ask you to fill out the blue card, the speaker card, and either bring it up to the table here or hand it to Roxi back in the back -- in the back of the room there.
We need to have your name and address for the record. There is a place for that on the card.
And we will use these cards to call on you as a speaker and to bring you up to the microphone. The microphone is right up here in front.
As is typical at an event like this, we have a court reporter here tonight to record everyone's comment. And she would like to ask that each of you when you get up to speak, once again repeat your name and affiliation and address.
So that everyone who has a chance to speak who wants to speak, we are allowing each speaker a maximum of three minutes. There will be a timer that comes on to the screen that will run the three minute countdown.
With that, I would like to introduce Bill Witte, who will, I think because of his voice, introduce Bea Hsu. But here is Bill.
MR. WITTE: That's exactly what I will do. I apologize, but I don't have much of a voice tonight.
So without further ado, I'm going to ask Bea Hsu, our vice president for development, to briefly describe the project.

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MS. HSU: Hi, my name is Bea Hsu with The Related Companies, and I'm today the voice of Bill Witte, and I'm just going to briefly walk you through a project overview.
First, lights please.
There are basically three major components to the Grand Avenue Project.
The first is the Civic Park, and the second is the Grand Avenue streetscape.
The third is the development parcels, which includes five development parcels -- parcels Q, W-1, W-2, and parcels L and M.
Here is another look at the development site, just with the conceptual plan that was prepared last year.
The Civic Center Park is a 16-acre area. It's to be delivered as part of phase one.
This is the mid-block area stretching from Grand all the way to Spring Street.
And the goal of the park is to revitalize and expand upon and activate the existing Civic Center Mall

through a new design that's functional and accessible to it.

The design intent will be to facilitate a program of ongoing special civic events and activities, and three blocks will be designed to either function separately or as a whole for larger events.

The idea is the streets would stay open and you would still have three blocks: One from Grand and Hill, one from Hill to Broadway, and one from Broadway to Spring.

And those blocks could be used individually, or altogether, if there were to be a larger event.

The next major component is the streetscape program, which is planned to run from all the way from Cesar Chavez to Fifth Street, and there would be a phased development along with the three development phases.

The anticipated improvements would include: Widening shady sidewalks where feasible, and landscape and streetscaping, and arrange the street furnishings, which may include lighting, benches, trash receptacles and way finding systems, as needed.

Finally, development parcels.

Starting with parcel Q, which is the block right across from the Disney Hall just easterly of Grand Avenue -- that's intended to be phase one of development, which would include:

500 units of housing, 20 percent of the units -- or 100 -- would be affordable.

A 275-room hotel.

And 284,000 square feet of retail.

Parcels L and M, which are the parcels westerly of Grand Avenue and just to the south of Disney Hall, would be developed as phase two.

It includes:

850 units of housing, 20 percent of which would be affordable, or 170 units.

And 101,000 square feet of retail.

Parcels W-1 and W-2, which are the blocks easterly of parcel Q, are anticipated to be developed as phase three of the project, and it includes:

710 units of housing, 20 percent of which would be affordable, or 142 units.

64,000 square feet of retail.

And 681,000 square feet potential county office building, which would be the replacement office building for the current Hall of Administration.

Or, should the county not elect to locate a replacement Hall of Administration on this site, that square footage would instead be converted to an additional 600 units of housing -- again, 20 percent of which would be affordable, an additional 120 units of affordable housing.

And with that, I'm going to turn it over to Bruce Lackow, with Chris Joseph, who will provide the rest of the program tonight.

MR. LACKOW: Great. Thank you, Bea. Let's see.

Let's start out with that you have probably heard a lot about the project before at any number of

community meetings or any other forms of communication, whether it be the Authority's website or some mailings of that sort.

But you probably -- but it's possible you may not have heard a whole lot about the environmental impact report, or one of acronyms which we will use -- we will try to keep the acronyms to a minimum -- and that is the EIR.

So what I'd like to do is walk you through not only the process for the EIR and what the purpose of tonight's meeting is, but I'd also like to walk you through some of the key findings of the draft EIR as a means of helping to bring you into the project's environmental review process, which is a very important and critical process that's not only required by state law, but is very, very important for public participation, and is an important way for you as the public to become involved with the project at this level.

Let's start out with a little bit about the purpose of the meeting tonight.

As Martha had indicated, the draft EIR is currently in public review.

It started in public review on June 14 and will continue through August 3rd.

The August 3rd date is a very key and important date, because that is the statutory required deadline for submitting your comments on the draft EIR.

There are several ways to review the draft EIR.

You can see it at the county or CRA's offices.

It's also available at the local public libraries.

It's available on the Internet.

And you may also purchase a CD, some of which we have available tonight; and if we run out, we will just take your name and well be able to forward a copy of the CD to you very shortly.

The purpose of tonight's meeting really is to listen to your comments.

While the presentations are an important point of departure for your comments, the real purpose of the meeting tonight is to listen.

Because the main purpose of the meeting is to listen, we will not be responding to specific questions about -- criticizing or making comments about the environmental impact report.

However, we will answer factual questions about both the project and the draft EIR.

As Martha had also indicated, there are three ways to comment on the draft EIR.

Tonight's meeting is one of them.

You may also mail in written comments to the Authority.

Or you may E-mail written -- you may E-mail comments to the Authority as well.

All comments, whether they are given tonight or in writing or via E-mail, will be responded to in writing in the final EIR.

And once again, to reiterate the importance of the deadline, the deadline for submitting comments is August 3rd of 2006.

The final EIR will also include a transcript of tonight's meeting.

I just want to walk through some of the major milestones in the SEQA process. Some of them are history. Some of them are current. And some of them are in the future.

Obviously, we know a lot about the past and we know a lot about the present, and we have some

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projections about the future.

The notice of preparation, which is the start of the SEQA process, was issued on August 31st of last year. It circulated for a 30-day period.

Within that 30-day period we held a public scoping meeting, which we invited the public -- just as we are tonight -- to come in and help us understand what are the issues of concern for the community.

We then started to prepare the draft EIR. We started that in September of 2005. And it took us about nine months to complete the draft EIR.

And then it got circulated in June.

There is typo up on the screen. The start date for the draft public review period is actually June 14, not June 10. And I apologize for that typo.

So the draft EIR public review period under SEQA can be no less than 45 days.

We decided to add a few extra days because of the importance of the project to the community and to the decision makers to allow the public and other public agencies a couple extra days to respond to the comments -- to respond to the draft EIR.

So actually the public review period for this project is set at around 50 days.

At the close of the public review period, we

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are going to take in all the input you provided -- tonight's meeting, E-mail, written comments -- then we are going to sit down and we are going to start writing responses and prepare the final EIR.

We are currently forecasting this will occur over the summer and fall of this year.

Once the final EIR is prepared, the environmental impact report is ready for public review -- for public hearing, rather. I apologize for that.

We are currently forecasting that the public hearing process for the project will be conducted in the fall of 2006, with certification of the EIR by the Authority, by the Board, in -- also in fall the 2006.

The SEQA process starts with a document called an initial study.

What the initial study does is that it provides a first review of the potential environmental impact of the project, and it looks at everything that could possibly be affected by the project.

In conducting this analysis, we determined that the following issues would not have significant impacts, and therefore did not require further review in the draft EIR, those being:

Obviously, agricultural resources -- don't see very much crop growing in this part of Los Angeles.

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Biological resources; archaeology and paleontology; earth resources; and hydrology.

In contrast to this relatively short list, what's provided next is an overview of the issues analyzed in the draft EIR.

There were a total of 16 different environmental issues analyzed in the draft EIR, including:

Land use; traffic, circulation and parking; esthetics and visual resources; historical resources; population and housing; air quality; noise; hazards and hazardous materials; fire services; police services; schools; parks and recreation; libraries; water supply; wastewater; and solid waste.

An important part of an environmental impact report or EIR is not only the analysis of the impacts that the project will have on the environment, but also looking at alternatives to the project.

In conducting this EIR, we identified a total of five different alternatives for the project.

SEQA, which is the California Environmental Quality Act, which is the law that governs the preparation of EIRs, says that you can analyze a no-project scenario, which is leaving things the way they are.

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And that the no-project scenario can happen in one of two ways:

It can be a do-nothing scenario, which in the case of our document called the "No-Project A" alternative.

Or the project could develop under its existing land use regulatory controls.

Normally, that's defined by the permitted zoning on the project site.

In this case, because parcels Q and W-2 were part of an earlier owner participation agreement, dating back to the early 1990s, that document and the permitted land uses in that document defined the alternative, the No-Project B alternative relative to those parcels.

We did use zoning to define the land uses permitted under parcels L/M-2and W-1.

Under this alternative, development was on the order of:

800 residential units.

About 65,000 square feet of retail.

About a million and a half square feet of office development.

And 400 surface parking spaces.

The next alternative that we looked at, which is very standard and typical for EIRs, is a reduced

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density alternative.

In this case, the reduced density alternative was set at a 25 percent reduction in all the developed land uses at the project site.

This resulted in an alternative that consisted of:

About 1500 residential units.

About 200 hotel rooms.

About 340,000 square feet of retail.

And about 510,000 square feet of office development.

We also looked at an alternative design for the project -- one of the things that we will get into a

little bit later is this notion of significant impacts.
And under SEQA, significant impacts are the most important impacts of all.
So what this alternative tries to do is it tries to reduce or eliminate some of the significant impacts of the project.
There were two specific types of significant impacts this alternative was designed to respond to.
One was potential significant impacts associated with the implementation of the proposed Civic Park and with regard to historic resources.
And the other was looking at ways to reduce

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view impacts for those who live in the Grand Promenade Tower residential building by moving the towers on parcels L and M-2.
The land to be -- the amount of land to be developed under this alternative is the same as the project.
The last alternative that we analyzed in the draft EIR is we said: How would the impact to the project change if we eliminated almost all of the commercial development and made this almost an exclusive residential development?
And that alternative became known as the alternative land use alternative.
Under that, the alternative calls for the development of about 3400 residential units, and about 35,000 square feet of retail floor area.
One of the things that SEQA asks you to look at is: What are the impacts to the project if you developed it in a different location?
When we looked at the project, this project is so integrally linked to these specific development parcels -- obviously, the Civic Park is a fix, the Grand Avenue streetscape is a fix -- so there really wasn't a way to really relocate this project to another location.
So the alternative site analysis was determined

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to be not appropriate for this project.
Now, let's take a look at the EIR analysis itself, now that we have a basic primer on what SEQA is and what SEQA is trying to do.
The first thing that's very important when looking at a project is: When is it going to finish?
Because SEQA asks you to look at the project at its completion.
The completion year for the Grand Avenue project as currently contemplated is 2015, or roughly an eight-, nine-year time frame from the point of certification and project approval.
As Bea had mentioned in her presentation, the project may be developed in one of two ways -- and this really has to do with a decision on the part of the County of Los Angeles to proceed with a county office building on the project site.
So we have two scenarios that were both analyzed in the draft EIR equally.
So we have the project with county office building option, and, as Bea had indicated, that has:
2060 residential units, 412 of which would be affordable.
It has 681,000 square feet of office

development.

449,000 square feet of retail development.
And 275 hotel rooms.
In comparison, the project with additional residential option -- and this is what happens if the county decides that this particular development -- this particular project location is not the right place for the relocation of the Hall of Administration or if they decide not to relocate the Hall of Administration at all -- under that scenario, you exchange the 681,000 square feet of office development it for an additional 600 residential units.
So then you get under this scenario:
2,660 residential units, 532 of which would be affordable.
No office development.
And the same amount of retail and hotel development.
Also, what's important is that under both development options, what happens in the Civic Park and what happens with the Grand Avenue streetscape is the same.
Now, let's talk about some very specific environmental issues.
When everyone thinks of development in Los Angeles, it really comes down to first and foremost

on a development of this size and magnitude is: What are the traffic impacts of this project?
We analyzed the traffic impacts in consultation and under the guidance of the Los Angeles Department of Transportation.
They reviewed the project's traffic study, and they approved the project's traffic study.
The traffic analysis analyzed both construction impacts -- impacts that happen during construction of the development -- as well as impacts after the development is completed and fully operational.
The analysis of construction impacts identify three types of short term temporary traffic significant construction impacts:
One is associated with haul trucks, particularly those traveling during AM peak hour, when everyone is trying to get to work.
Temporary lane closures during construction.
And one of the aspects of the Civic Park improvements is reconstructing the ramps that lead to the parking garage under the main block of the Civic Park.
Now, focusing on the -- now focusing on the operational side, the traffic analysis analyzed 32 intersections in an area bounded by the 101 Freeway on

the north, Spring Street on the east, Sixth Street on the south, and Figueroa Street on the west.
In addition, the traffic analysis analyzed 14 different freeway locations along the Harbor, Hollywood, Santa Monica, Golden State and Pomona Freeways.
Now, it's time to talk about the results of that analysis.
What I have done here is given you a tally of the traffic impacts before and after mitigation, so we

can understand what are the traffic impacts of the project, but it also gives us an opportunity to understand the effectiveness of the traffic mitigation measures that have been developed for the project.

As you can see, the impact profile under the two development options is fairly similar, but, not surprisingly, the development option with residential -- with more residential has fewer traffic impacts because what we are doing is: We are trading residential units for office development, and residential units generally have less traffic impacts, particularly during the peak hours, in comparison to office development.

So before mitigation, with the office building, there are:

Seven significant impacts in the AM peak hour.

17 in the PM peak hour.

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And two of the freeway locations are significantly impacted.

In comparison, the residential option has:

One less significant impact in the AM peak hour.

The same number of significant impacts in the PM peak hour.

And the impacts on the freeway locations go away.

Then the mitigation package was developed for the project's traffic impacts.

The seven significant impacts under the office building option dropped to one in the AM peak hour. Very effective mitigation package.

In the PM peak hour, it dropped from 17 to 13, also a fairly effective mitigation package.

And then -- but most importantly and what we all like to see is: The significant impacts on the freeways went away.

With regard to the residential option, the mitigation package was even more effective.

With regard to the AM peak hour, all of the significant impacts went away.

In the PM peak hour, the number of significant impacts were reduced from 17 to seven.

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And there were no impacts on the freeway under the residential option.

There were a few other aspects of the traffic analysis that we also thought were relevant and important to talk about tonight, one of which is about the Civic Park.

If the Civic Park is successful, as everyone hopes it will be, it will also create some activity in the area, so that the Civic Park events will infrequently cause significant traffic impacts.

Now, turning our attention to parking -- because while traffic is important -- and very important -- parking is also very important.

The project meets the Municipal Code requirements, the zoning requirements for parking.

However, there is a policy that is currently under review for revision that establishes a higher parking rate than what is in the Municipal Code.

And what the project is doing is it is requesting a variance in the event that the policy is

not changed prior to certification of the final EIR.
Variances of the type that are requested by the project are very typically granted by the city for projects in the downtown area, as the policy is really geared towards the parking demands of projects that are

more in the -- what are, quote, the more suburban areas of the city, not the downtown core.
One last point on traffic is that the project impact to the off-site parking supply -- that's the parking that's available in all the buildings and surface parking lots around the project site -- are also less than significant.
That takes care of traffic.
Another very important environmental issue and impact area is historical resources. Some people think traffic is the most important.
If you love old buildings, you probably think that historic is the most important.
Let's start by saying there are several culturally and historically significant buildings in the project area.
These include not only old buildings but new buildings as well -- Walt Disney Concert Hall, the Music Center, the County Courthouse, the Cathedral we are in tonight, the Kenny Hahn Hall of Administration, and other buildings in the area.
The Civic Center buildings, structures, objects and sites also appear eligible for designation as a potential historic district.
So that's where not only are individual

buildings important, but that there is some fabric that is created that ties the buildings together that also creates an importance at a historic level.
When we look at the impact of the project on these historic resources and potential historic resources, we see that there are no impacts associated with the development parcels.
That's parcels Q, W-1, W-2, L, and M-2.
If the Civic Park and the Grand Avenue streetscape improvements are developed in substantial compliance with the current conceptual plans, then no impacts to off-site historic resources would occur.
However, to make sure that the impacts are not significant, we have identified a series of mitigation measures to further support and protect the resources.
Looking at the existing Civic Center Mall, which is the location of the future Civic Park, it appears to be eligible for individual listing in the California Register, as well as a contributor to the potential historic district.
Implementation of the proposed Civic Park may result in the removal of what are called character-defining features.
What character-defining features is is a really important term and concept with regard to historic

resources, so I'll take just a few seconds to explain it.
What character-defining features are are those elements -- in this case, of the existing Civic Center Mall -- that really create a sense of its history.

can understand what are the traffic impacts of the project, but it also gives us an opportunity to understand the effectiveness of the traffic mitigation measures that have been developed for the project.

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However, there is a policy that is currently under review for revision that establishes a higher parking rate than what is in the Municipal Code.

And what the project is doing is it is requesting a variance in the event that the policy is

Downtown Strategic Plan, the Civic Center Shared Facilities and Enhancement Plan, and SCAG's Regional Comprehensive Plan and Guide.

SCAG is the agency that oversees planning activities at a regional level.

So the project is consistent at a city level, at a local level, at a CRA level, and also the SCAG level.

One thing that does bear importance with regard

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to the land use issue, and that's the project does require zone changes and variances in order to be implemented as proposed.

The zone changes and variances are required due to the density proposed for parcels W-1 and W-2 as well as L and M-2, and also to allow hotels, restaurants, signage, public parking and alcohol service on a portion of parcel Q -- the portion that's zoned residential as opposed to the portion that's zoned commercial.

While the zone changes and variances to the Municipal Code standards are required, that -- it's important to note that these are not inconsistent -- or rather a better way of putting it, that the proposed zone changes and variances are consistent with the Central City Community Plan as well as the Bunker Hill Design for Development.

Now, it's time for the conclusion and sort of wrapping up what -- I appreciate your patience with a fairly lengthy presentation, but I thought it was important in order to help understand what the environmental impact report is, because there is a reasonable chance you may not have had a chance to review the document before tonight's meeting.

Looking at conclusions, all feasible mitigation measures have been recommended in the draft EIR.

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Nevertheless, the following significant impacts occur:

Land use, as a result of the variance -- need for variances, and a zone change.

Traffic and parking, as we talked about during construction, as well as operations.

Aesthetics and visual resources, due to a few impacts from a few locations, and shade/shadow impacts on a cumulative basis, which is the impacts of this project and all other planned projects in the downtown area.

Historical resources, because the character-defining features of the Civic Center Mall may not be able to be retained or reused per the Secretary of the Interior Standards.

Air quality, during construction, as well as operations.

Noise, during construction for the sensitive noise receptors that are located in close proximity to each of the development parcels.

Police services -- this one is significant only at a cumulative basis, and only if the City does not add enough resources to the LAPD to allow it to successfully accomplish its mission. We don't expect there not to be enough police officers, but just to be conservative, we

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decided to call it a cumulative significant impact on

the EIR.

And parks and recreation only as a function that the existing Civic Center Mall, which is an important park and recreation the space for the downtown population, will not be available during the periods of construction in the Civic Park.

Because of these significant impacts, the EIR certification requires adoption of a statement of overriding considerations.

All other impacts of the project are reduced to less than significant levels.

And in closing, the deadline for submitting comments on the draft EIR is August 3rd, 2006.

That concludes my presentation for this evening, and it's time for me to stop talking and to start listening to what you folks have to say.

So with that, we will switch over to the public portion of the --

MS. WELBORNE: For those of you that might have come in when the presentation was underway, if you would like to speak please fill out a blue speaker card, and either bring it up here, or give it to someone in the back of the room.

Bruce will call your names out for those of you

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who have already filled out your cards, and we would ask that you come up to the microphone in the front, and repeat your name -- because we are recording the session, repeat your name, affiliation and address.

And then please give us your comments.

MR. LACKOW: As you see, there is a very large three minutes up on the screen.

MR. RUSSELL BROWN: Is there a distinction between public comments about the project, and just questions about your presentation?

MR. LACKOW: What we will try to do, if there are questions about the presentation that don't get into the analysis in the draft EIR that are just factual in nature, I'll do my best to answer them, you know, as part of the interaction.

What you will do is: You will make your comments. I will jot down your questions.

And before I go to the next speaker, I will do my best to try to answer them.

I may not be able to answer all your questions tonight. If I don't answer them tonight, they will be answered, regardless, in the final EIR.

MS. EARLY: And if speakers would please use that microphone, so we can record their comments.

MR. LACKOW: Yes. And once again, just to

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reiterate that point for the benefit of all, we'd like for to you come up to the front and use the microphone, really for the benefit of the rest of the audience, and also our court reporter, who has a very, very difficult job trying to keep up with all of us tonight, and anything we can do to try to make her goal a little bit easier, I think would be an admirable goal for us tonight.

With that, I'd like to call up the first speaker, Joseph Thomas.

Speaker No. 1

MR. THOMAS: My name is Joseph Thomas. I'm affiliated with LA CAN, and also a community resident.

M-1-1

All right. One way to reduce the emissions and traffic impacts of construction is to ensure that individuals employed during construction already live near the project.

The draft EIR projects that there will be 250 to 600 construction worker on site per day.

For many parts of the region, there is no suggestion that any number of downtown or nearby residents will be among those working construction.

That means lots of lengthy commutes by car, and heavy traffic.

The authorities should consider an aggressive local hiring program for construction as a mitigation measure to correct this problem.

The EIR and actions by government always seem solely focused to bringing people in to live where they work.

But equally important, current downtown residents would like to work where they live. Thank you.

M-1-1

MR. LACKOW: Thank you, Mr. Thomas. Next speaker is Deborah Burton.

MS. BURTON: My name is Deborah Burton, and I work at -- I live at 622 South Wall Street. I work with the Los Angeles Community Action Network, and I'm also a downtown residence.

Speaker No. 2

The EIR states that the project's construction may result in temporary lane closures that could potentially affect emergency access, and that construction activities may temporarily increase the demand on fire services due to the presence of combustible material.

Emergency access is critical to the downtown community, especially given that we have a disproportionally high number of elderly residents and residents with disability.

Any delay in emergency services to this group is significant. It could mean life or death.

M-2-1

Example, now there is a lady who is having a heart attack, and we call the fire department because they are close.

But they have to go at least a half mile in order to get to a place that's only a block away because of the lane closures.

We got all these trucks moving in.

So I mean, she is right there, they are a block away, and he has to go a half a mile in order to get to her.

So that would be, I mean, a ways. So I think you should consider how this would affect residents in the downtown community. Thank you.

MR. LACKOW: Thank you, very much. Next speaker Linda Valverde.

MS. VALVERDE: Excuse me. My name is Linda Valverde. And I'm a downtown community resident. Also I work downtown with Los Angeles Community Action Network.

Speaker No. 3

And I'm here to express concern over the project's air pollution that will strongly impact the men and women who live downtown, roughly 8,000 of whom live outside.

M-3-1

Construction on the project is projected to last nine years.

The hauling of excavated material will consist of 300 truck trips a day for six to eight months.

The draft EIR concludes that there will be significant and unavoidable cumulative impact from construction emissions.

In particular nitrogen oxide and particulate matter emissions are projected to be at particularly dangerous levels.

Numerous scientific studies have documented the severe health risks that arise from dangerous levels of particulate matter and diesel emission associated with both on-road and non-road construction equipment.

New studies show chronic exposure to particulate pollution shortens life by one to three years.

M-3-1

A study of the 90 largest U.S. cities found strong evidence linking daily increases in particulate pollution levels to increases in daily death rates and in hospital admissions of the elderly.

These results are consistent with a study of 12 European cities.

Particulate pollution has been tied to low heart rate variability, a risk factor for heart attack.

A chamber study with human subjects found that concentrated air particles can induce pulmonary inflammation and increase concentration of fibrinogen in the blood, a risk factor for clotting and heart attack.

There are more than 8,000 homeless people living close to the Grand Avenue project. They are at risk of 24-hour exposure to the construction emissions.

Many are already in difficult health conditions with limited access to medical care.

Yet there is no analysis in the draft EIR of the human health risk of this population of either the project, itself, or cumulative impact of the 93 related projects.

MR. LACKOW: Thank you, Ms. Valverde. Next speaker -- I hope I have this name right -- Genera Dogon. I apologize if I got that wrong.

MR. DOGON: Good afternoon, ladies and gentlemen. My name is Genera Dogon.

MR. LACKOW: Dogon. With a G.

MR. DOGON: I'm a member of LA CAN. I'm also a downtown community resident, and a point man on the community watch team downtown here, downtown on Skid Row.

Speaker No. 4

And my question is: The EIR states that increased activity within the five development parcels and Civic Park would likely result in increased demand for police services.

Through the provision of project security personnel in the park, the demand for services provided by LAPD is not anticipated to increase over existing conditions.

M-4-1

This raises two important points.

First, private security may or may not decrease the demand for LAPD services.

Currently in downtown, private security guards

work closely with LAPD and are often accompanied by LAPD officers while performing their duties.

Second, the use of private security in the park raises questions about access to the park by all downtown residents, including homeless residents.

For example, Pershing Square, right here on Fifth, is a public park, but right now it's all roped off with yellow crime scene LAPD tape.

Pershing Square has a long-time private security, but two seconds after LAPD comes into the park, the park security guards lose their protocols and we got LAPD dictating to the park guards.

Now, you claim this park will be open.

Now, when LAPD comes into the park, what are you going to do to stop LAPD protocols from roping off this park and taking over the park and throwing out who they see as unfavorable?

And could you please print these statements in your pages in your report.

MR. LACKOW: Thank you very much, Mr. Dogon. Next speaker is Roberto Carbajal.

MR. CARBAJAL: Hello, my name is Roberto Carbajal. I'm an iron worker and I'm a welder with iron workers and a welder for about eight years -- I mean, since 1980.

But I have only worked one time downtown. That was in 1980. And since then haven't been able to get a job in downtown.

I'm a downtown resident.

I'm scale, where I sometimes qualify for GOR, gone through several people, including the CRA, I believe it's called, USEF, City Hall -- all kinds of people trying to get on these job sites.

I even went to the Cal Trans job site and asked them how does one get on this job site, I understand for residents and low income people, they are supposed to have priority on these jobs.

And they said they had no idea what I was talking about.

There was nobody regulating that.

I was hoping maybe you could have some kind of office, some sort of special -- like an employment draw -- with the backing of the -- Councilman Huizar's office, and Fabian Nunez, the speaker of the House, like an oversight committee.

Because there should be somewhere where I can call and they can hook me up with a job.

I have got three welding licenses. There is no reason why I shouldn't being working downtown.

Staples Center has four-hour tryouts where you would go -- they would give you four hours. They could move you, they could bounce you, but they could still claim you as a minority or as a woman as if they had hired you. They could write that off. And they what they hired you for was four hours.

I was hoping you could held us get jobs downtown. Thank you.

MR. LACKOW: Thank you, Mr. Carbajal. Next speaker is Samuel Sanchez. Is Mr. Sanchez in the room? No? Oh, great. Better late than never.

MR. SANCHEZ: I'D just like to start out by

M-4-1

M-4-2

Speaker No. 5

M-5-1

Speaker No. 6

M-6-1

saying I was at a meeting at the LACMA several weeks ago discussing project ideas brought on by different artists, conceptual artists and environmental people about this site.

And a lot of them were really thought out and maybe even some of them were far-fetched, but most of them didn't seem to incorporate the idea of sustainable living.

M-6-1

And in an area where many of our residents have less than an acre per thousand people -- I think I have heard the quote at that same meeting, at the LACMA, that said that the LAUSD is the second largest user of concrete in America, seconded only by Cal Trans.

So when we think about that, we should really incorporate that into what we do with our building.

I know that there is a civic space there in the middle or a central green area, but what natural organic living plants do -- that you can eat -- do to the environment that grass cannot, is clean our water.

I'm not sure of all the details of the Corn Field project, but I know that certain projects such as the South Central Farm and others actually clean L.A.'s water.

When it rains on grass that has been treated with herbicides and pesticides, that water goes into our ground water, and it cannot sustain life when you spray pesticides on it.

Now, another thing I wanted to bring up in my minute is: I have worked in L.A.

I worked for the carpenters union on a building that was formerly known as the Mobil Oil building. It was on the corner of Sixth and Flower.

And I'd like you to consider the environmental impacts of all the concrete and things that will be broken up and created, and the effects of silicosis on the lungs of children in the environment.

And when I worked in that building on Sixth and Flower, although we were supposed to, a lot of the abatement processes were not followed accurately or honestly.

M-6-2

And I myself was exposed to a lot of asbestos and silica dust, even though I had the proper PPE.

Now, when I saw the abatement done by the people who were licensed to do it, I saw those particulates going into the air constantly.

They did their projects at night and they were covered by tarps, but dust was continually flying out of the abatement process.

I'd like you to consider that when you think about the destruction of concrete and different things that will happen in this project, and the trucks that will fly by emitting all sorts of other pollutants.

Thank you.

MR. LACKOW: Thank you, Mr. Sanchez. Next speaker, Gilda Haas --

MS. HAAS: I think Sister Donaghue has to leave --

MR. LACKOW: Okay. She was next, but we will reshuffle the deck.

MS. HAAS: Thank you.

Speaker No. 7

SISTER DONAGHUE: My name is Sister Diane Donaghue, Esperanza Community Housing, and I'm here representing the Grand Avenue Community Coalition. And we will have additional comments on the 3rd of August deadline.

M-7-1

Our perspective is not just about environmental impacts and mitigation, but about people and sustainable development.

Our concerns are grounded in questions about who is impacted by Grand Avenue, who pays for this impact, and who benefits.

In reviewing the EIR, several points are clear.

A stronger nexus needs to be built between transportation, housing and jobs at a level of detail that will produce meaningful results.

This project is uniquely situated for this to be possible.

A stronger relationship needs to be built between the benefits that may be derived from this project and the underserved, underhoused, and underemployed residents of Skid Row in South Central Los Angeles.

M-7-2

These two efforts, taken to a refined level of specificity will improve the effectiveness and reach of the mitigations proposed by the draft EIR.

The Grand Avenue project is uniquely situated in a downtown area between the representatives of extreme poles of downtown.

It's walking distance from the magnificent new assets, including Disney, and the new Cathedral.

It is also walking distance from Skid Row, where the nation's largest homeless population resides near other low income people who live in residential hotels.

This project includes alternative scenarios, one which includes a new county office building, and another includes additional housing.

Of all the environmental impacts, traffic is one of the most intransigent and complex due the fact of an enormous development boom in downtown.

The EIR cites over 90 related projects that contribute to these impacts.

Nevertheless, it's clear that we have a significant impact on traffic in Los Angeles.

The County of Los Angeles is the largest employer, with many of the workers of diverse ranks and salaries located in county office buildings within a relatively small radius of the project.

M-7-3

The county also pays the lion's share of the benefits to Skid Row.

A stronger nexus between the project and these facts could result in a much stronger traffic mitigation, adding project viability as well as community benefits.

In short, in the EIR, the devil is in the details, and much more detail has to be made available in the description of environmental problems, rather than in solutions.

Although it's commonly the case, this opportunity could be an incredible example of things to come. Thank you.

MR. LACKOW: Thank you, Sister. Next speaker will be Gilda Haas.

Speaker No. 8

MS. HAAS: I was basically going to say that.

M-8-1

MR. LACKOW: Okay. Thank you, Ms. Haas. Next one is -- I apologize if I mispronounce the name -- and that's Alberto Tlatoa.

MS. TLATOA: Good afternoon, everybody. I'm Alberto Tlatoa. You got it right. Thank you.

Speaker No. 9

I have a couple of concerns.

How can you make it accessible for everybody in L.A.?

M-9-1

I mean, it's already expensive to be in downtown. When you come and park, it's like $12 for parking.

So how is it going to be accessible for people of low income areas to come down and enjoy this park?

And also, what kind of businesses will be invited in this project?

Because we usually see the Starbucks and McDonald's. How are you guys going to improve the quality of more healthy food in that area, and snacks are also going to be available for the people.

M-9-2

And also for the affordable housing, what will be the income required of low income to move into downtown?

It's already expensive to live downtown, so how would you guys help people to come down and to come and enjoy this affordable housing you guys are creating?

M-9-3

That's about it.

MR. LACKOW: Thank you very much for your comments. Next speaker is Russell Brown.

MR. BROWN: Good evening. My name is Russell Brown. I'm president of Residents Association of Downtown L.A. I'm also the co-chair for the Historic Core Neighborhood Grant Committee, and the organizing chair for Alton Downtown L.A., which is a 500-member social organization.

Speaker No. 10

We are very much in support of this project. We look forward to the Civic Park. The quality of the design is really quite good.

I'm glad you were able to bring Frank Gehry in.

M-10-1

The community-serving retail is really a component that is desperately needed downtown.

The new housing, I think, will add a great complement into the Bunker Hill area, especially the affordable housing, which is pretty much being done with no public subsidy.

I think this is going to be fairly successful creating a sense of place where right now we don't have that.

We especially like the fact that it's adjacent to major public transportation, including the subway.

We look really forward to creating a new neighborhood here and having a great place to do big civic events that I think can be recognized worldwide.

So we complement you on your plan.

I do have one question: In the EIR I didn't understand if you move the county headquarters basically across the street, and it's an even exchange, why that's suddenly registered big significant added impacts?

M-10-2

To me, it would seem like it should have been exactly even.

MR. LACKOW: Okay. Basically -- I will try to answer that, and we will give you a more complete answer in the final EIR -- is that we did not assume that the occupancy of the existing hall would be eliminated.

We assumed that the existing traffic levels associated with that would continue in the future.

So we took the conservative position that the project would be additive on top of that, rather than a net wash.

Basically, we have two more speaker cards. Those are for Ben Beach and Esther Alejandro.

And if there is anybody else who wants to speak, we would request that you fill out a speaker card and bring it up to the table.

If not, then we will go with these two speakers, and we will do one more last call.

Ben Beach?

MR. BEACH: Good afternoon. My name is Ben Beach with the Legal Aid Foundation of Los Angeles.

One item I'd like you to address is the height of the microphones in the project, which are clearly insufficient to accommodate the need of all residents downtown.

MR. LACKOW: Are you feeling better now?

MR. BEACH: Wow, this is a serious mitigation measure right here.

So my name is Ben Beach, Legal Aid Foundation of Los Angeles.

I'm here to raise two points about the EIR.

The first relates to construction emissions.

As you have heard from prior testimony, residents of downtown are seriously impacted by the construction emissions associated with the project.

There are more than 8,000 of those residents who are at risk of 24-hour exposure to the very harmful particulate matter from the diesel emissions, from both -- that is, both on-road and non-road sources associated with the project.

And so I would urge that the draft EIR analyze all possible technological solutions to reduce construction emissions.

In particular, I'd just like to suggest the analysis of diesel particulate filters, which have been shown to reduce carbon dioxide -- sorry -- carbon monoxide emissions by 60 percent, as well as reduce the emission of other toxins.

In addition, I would also urge the analysis of a selective catalytic reduction system on the construction emissions.

I'd like to turn now to the second point, which relates to energy.

As many of you know, it's quite hot.

And yesterday the news reported that energy consumption in the state exceeded the all-time record.

I think it's probably, then, an appropriate time to note that the draft EIR report contains no dedicated analysis of the energy consumption impacts of the project.

I think that's a pretty significant oversight.

M-10-2

Speaker No. 11

M-11-1

M-11-2

The draft EIR does contain a handful of mitigation measures related to energy, and those are important.

But this really is a flagship project to the City of Los Angeles, and I think we ought to be able to say that we have fully analyzed the environmental impacts, particularly the energy impacts, and this project, and we can really call it a green building.

In that respect, I would urge the analysis of the LEAD standards, the Leadership Energy and Environmental Design standards.

And it would be really wonderful if we could call the Grand Avenue project a LEAD-certified building.

And right now there is no analysis that would

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enable us to do that.

The city itself has already committed itself to the LEAD standards.

The city itself has a LEAD ordinance that applies to the Department of Water and Power new construction buildings.

There is also a bill before the city council right now that would require the study of -- requiring all leased projects from the City to be LEAD certified.

And this is, in fact, a project on city land.

So that's exactly the direction that the city is moving in.

And that's the direction the project should be moving in as well -- it should be a LEAD certified project. And we'd love to see that.

And the reason we are talking about that, what the prior testimony has indicated is we are really talking about the human impact.

And LEAD-certified buildings have a great capacity to reduce the heat island effect, which has been recognized by the City's Environmental Affairs Department.

And that -- the heat island effect -- is something that really, truly impacts, particularly the homeless population in downtown, who has to live with

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three to ten degree increases in heat in their very own home. That you, very much.

M-11-3

MR. LACKOW: Thank you, Mr. Beach. The last speaker card I have before me is Esther Alejandro.

And in the spirit of equal opportunity --

MS. ALEJANDRO: That's okay. I'll manage.

Good evening. My name is Esther Alejandro, and I'm also a member of LA CAN, and a resident of a downtown area.

Speaker No. 12

And what I would like to comment is the need for local hiring measures to reduce emissions impact.

There again we have it.

One way to reduce the emissions and traffic impact of construction is to ensure that the individuals employed during construction already live near the project.

The draft EIR projects that there will be 250 to 600 construction workers on site per day -- that's page 21 -- for many parts of the region -- page 56.

M-12-1

There is no suggestion that any number of downtown nor near-by residents will be among those working construction.

That means lots of lengthy commutes by car in heavy traffic.

The authorities should consider an aggressive local hiring program for construction as a mitigation measure to correct this problem.

M-12-1

The EIR and actions by government always seem solely focused on bringing people in to live where they work.

But equally important, current downtown residents would like to work where they actually live. Thank you.

MR. LACKOW: Thank you, very much. Is there anybody else who would like to speak tonight? Okay.

Not seeing anybody raising a hand or stepping forward, I think what we will do then is we will close the public meeting --

Yes, sir? Could you please fill out a speaker card?

You can do it after you speak. Sorry for that. Trying to move it along a little bit.

MR. TORRES: My name is Benjamin Torres. I live downtown.

Speaker No. 13

And I just want to make a note that the impact this project would potentially have on my situation and living condition in terms of I make a pretty good salary and live in downtown.

But as a result of these type of projects where, you know, money is not set aside or planning not done in a way that looks at what kind of impact does it have on working poor or homeless folks -- myself who makes a middle class salary will have to move out of downtown because I will not be able to afford to live downtown.

M-13-1

And I'm a single man. Imagine what's going to happen to families.

So the EIR has to look at what impact it's going to have on families in the downtown corridor.

This is a great project potentially having a lot of beautiful opportunities for the downtown residents, but if those folks have to leave because they can't afford to live in the area as a result of projects like this -- there is no mitigation and no jobs, then the people can't afford to go to these kind of shopping centers, et cetera, and retail spaces -- then we are going to have a serious hollowing out of downtown similar to the one we had in South Central Los Angeles and other areas because people moved out of the area because they could not afford to live there.

And then we'll have the repercussions of violence and other types of activities -- increase in gangs and, you know, basically the loss of social capital in the community where people can actually contribute to change and be a part of the transition process to really make downtown a liveable place for everyone.

M-13-2

So that's just kind of a personal note I want to mention.

MR. LACKOW: Thank you, very much. If you could fill out a speaker card.

Okay. Is there anybody else who would like to

say a few words this evening?

Okay. Not seeing any, I think we will close the public meeting for night.

I will close it by saying that once again the deadline for submitting your comments, either by E-mail or by writing, is August 3rd of 2006.

Please be advised that if you ask a question of any of the representatives who made presentations tonight, that does not constitute a comment that will be responded to in the final EIR.

Please give us everything in writing. We want to make this as open and democratic a process as we possibly can.

Thank you, very much.

(Whereupon, at 7:08 p.m., the meeting was adjourned.)

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CERTIFICATE OF REPORTER

I, Catherine Ponicsan, R.P.R., C.S.R. No. 8271, do hereby certify:

That the foregoing proceedings were taken down by me in shorthand at the time and place therein named and was hereafter reduced to typewriting under my supervision; that this transcript is a true record of the proceedings and all public comments made, and contains a full, true and correct report of the proceedings which took place at the time and place set forth in the caption hereto as shown by my original stenographic notes.

I further certify that I have no interest in the event of the action.

WITNESS my hand this 31st day of July, 2006.

_____

C.S.R. No. 8271

(Certified Transcript Requires Original Signature of Reporter)

# V. RESPONSES TO COMMENTS
# B. PUBLIC MEETING COMMENTS

## INTRODUCTION

The Draft EIR public review period started on June 14, 2006 and ended on August 3, 2006. The Notice of Completion (NOC) that announced the availability of the Draft EIR to interested agencies, parties, organizations and persons, also provided information that an open house and public meeting would be held during the Draft EIR's public review period for the purpose of providing an additional means for the public to obtain information on the Project and to provide comments on the content of the Draft EIR. The NOC stated that public participation at the public meeting was welcome and voluntary. The public meeting was held on Tuesday, July 18, 2006 from 6:00 to 8:00 P.M. at the following location:

Cathedral of Our Lady of the Angels
Center at Cathedral Plaza, Meeting Room 6, First Floor
555 West Temple Street
Los Angeles, CA 90012

The NOC also provided information that attendance at the public meeting was not necessary in order to make comments on the Draft EIR and that written comments may be sent to the Authority as described in the NOC. As indicated in the NOC, oral comments presented at the public meeting were recorded and comment forms were also available at the public meeting to provide yet another alternative means of commenting on the content of the Draft EIR during the Draft EIR's review period.

During the public meeting oral comments were provided by twelve individuals and one written comment form. Based on the transcript of the Public Meeting, the comments of the twelve speakers are addressed in the following section. The speakers are addressed in chronological order and respective comments and responses are preceded by an "M." Following the responses to the oral testimony, responses to the one comment form that was submitted to the Authority are addressed. A "CF" so as to create a unique identification system for these comments precedes comments received on this one comment form.

**SPEAKER NO. 1**

Joseph Thomas

**RESPONSE NO. M-1-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on this Project. Your comment expresses the view that emissions and traffic impacts during construction would be reduced through the employment of individuals who live near the Project site. At the outset, it should be noted that the mixed use nature of the Project and its strategic location near mass transit centers will greatly reduce the number of traffic trips to and from the Project. In addition, the Project Developer plans to have a local hiring program. While they are currently working on the specifics of such a program, the program is not finalized and so no details are available at this time. It anticipated that the CRA/LA requirements for the Developer in relation to its local hiring responsibilities would be included in the contract actions on the Project, which will be recommended to the Authority and other approving public agencies. In addition, representatives from the City, County, CRA/LA and the developer are now working on the creation of a job outreach and training program that would provide opportunities for local residents to access both the construction and permanent jobs created by the Grand Avenue Project. The developer has offered funding assistance for jobs programs tied directly to the Grand Avenue Project. To supplement this commitment the City, County and CRA/LA are examining both in-kind and actual cash contributions to create an effective local hiring and training program. You may find that responses in this Final EIR to the letter from the Legal Aid Foundation also address your concerns on local hiring and training for Project jobs. See also, for example, Response Nos. 13-23 and 13-33, and 13-2 on the general limitations of mitigation measures required by CEQA.

Finally, it should be noted that the Draft EIR identifies that there would be no significant transportation impacts due to construction worker trips, so no mitigation measures are justified under CEQA. With respect to the issues on construction workers, see also Response Nos. 13-6 and 13-21.

**SPEAKER NO. 2**

Deborah Burton
622 South Wall Street

**RESPONSE NO. M-2-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on this Project. Your comments express the concern that, during construction, temporary lane closures and the presence of combustibles could increase the time for emergency response to elderly or disabled residents in downtown as well as temporarily increase the demand for fire services. . Information in the Draft EIR supports the conclusion that there will be no significant impact to these public services arising from Project construction. As shown in Table 74 (Draft EIR, Vol. 2, Section IV.I.1, Fire Services, page 625), the average response times for Fire Stations 3, 4, 9, and 10, which would serve the Project and currently serve the surrounding area are 5.3 minutes, 4.6 minutes, 4.8 minutes, and 4.9 minutes, respectively. These are all below the Citywide average response times of 5.5 minutes for EMS calls and 5.4 minutes to fire incidents and indicate that existing service is more than adequate. As also discussed in the Draft EIR, the LAFD would be notified of all construction scheduling in order to plan appropriate alternative response routes. Public detour routes would be established where required to divert traffic from the affected street segments. Due to the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, lane closures are not anticipated to significantly affect emergency access or emergency response times. In addition, emergency vehicle access to adjoining and nearby properties would be required to be maintained at all times (Regulatory Measure IV.I.1-1). The Draft EIR concludes that the LAFD's ability to respond to emergency incidents would not be significantly impacted by construction activities (Vol. 2, page 627). It is also concluded that as the area's intersections generally operate at acceptable levels of service, adequate emergency response times would be maintained. The better than City-wide response times, the large number of fire stations in the Project area, and the levels of traffic on the existing street network in the Project area support the conclusion in the Draft EIR that the ability of the LAFD to respond to emergency incidents would not be significantly impacted by Project construction or operational activities.

**SPEAKER NO. 3**

Linda Valverde

**RESPONSE NO. M-3-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on this Project. Your comment expresses the concern that the Project's air pollution will impact the men and women who live downtown and that the Draft EIR does not evaluate the human health risk of air pollution on the area's homeless population of the Project itself, or cumulatively with the related projects described in the Draft EIR. In fact, as explained below, the air quality analysis in the Draft EIR used conservative assumptions, followed all SCAQMD protocols, and did not discriminate against or exclude any particular group of sensitive receptors from that air quality impact analysis that should have been included. The commentator's assertion that the air quality analysis excluded the downtown homeless population may be based on a misunderstanding of Figure 43 and its relationship to the air quality analysis. As noted in the Draft EIR, the conclusions of significance are based on ambient air quality standards that are set at levels that provide a reasonable margin of safety and "protect the health of the most sensitive individual in the population" (Table 54, Footnote A, page 516). Sensitive receptors for air quality impacts include any residential area or locations where children, the elderly, the acutely and chronically ill would possibly reside or congregate (Draft EIR, pages 518 and 529). Figure 43 (Draft EIR, page 530) identifies sensitive receptor sites that would be subject to Project-related local emissions impacts and those that would be subject to cumulative local emissions impacts. The cumulative sensitive receptor sites extend to residential uses that reach to both sides of Main Street, between Second and Sixth Streets, which area would encompass that portion of the skid row area that would be nearest to the Project. Figure 43, however, does not call out any particular group of homeless persons given the mobile and dispersed nature of that sector of our population. Regardless, however, the information in Figure 43 was provided solely to provide information about the existing environmental setting. Whether any group of persons was identified in Figure 43 as sensitive receptors was not determinative of the significance of the Project's impact on air quality for the reasons described below.

For example, the localized effects of the Project's emissions during construction are evaluated in the Draft EIR (Vol. 2, Section IV.F, Air Quality, pages 524 – 529, 539 – 541, and 555 – 557). Localized impacts, which differ from regional impacts in that the latter are dispersed throughout the Los Angeles Basin, include the evaluation of carbon monoxide (CO) and the evaluation of toxic air contaminants (TACs) in accordance with SCAQMD requirements. Local

emissions are those that would have the greatest effect to the surrounding community and local sensitive receptor sites. The Draft EIR's analysis of localized air quality impacts is based on SCAQMD modeling protocols that use mass emissions as one of the bases for analysis. The Draft EIR's conservative estimate of maximum on-site daily emissions for CO, $NO_X$, and $PM_{10}$ (i.e., criteria pollutants) was compiled for each of the individual construction site locations and compared to the applicable screening threshold. Individual construction projects that are expected to occur simultaneously and are adjacent to one another were considered collectively as well as individually. SCAQMD's screening thresholds are set so that emissions that are below the threshold will not pose any significant risk to the health of even the more sensitive receptor groups (which would include any residential population of any type), or in other words not exceed an ambient air quality standard which have been established to provide a reasonable margin of safety and "protect the health of the most sensitive individual in the population" (Table 54, Footnote A, page 516). The air quality analysis in the Draft EIR concluded that localized CO emissions would not exceed the applicable threshold for any of the construction phases and, therefore, no significant impact attributable to CO emissions would occur. In contrast, the Draft EIR determined that localized $NO_X$ and $PM_{10}$ emissions would exceed their applicable SCQAMD screening thresholds and, therefore, the Draft EIR concluded that localized $PM_{10}$ and $NO_2$ impacts during short-term construction activities would be significant (Draft EIR, page 541). It is important to note that this conclusion was not limited to any particular group of sensitive receptors, but was conservatively assumed to apply to the entire surrounding community.

The Draft EIR also evaluates TACs resulting from Project construction. The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. The Draft EIR evaluated the health effects from carcinogenic air toxics according to SCAQMD methodology. This particular air quality analysis started with a quantification of the $PM_{10}$ emissions generated by on-site construction equipment, as well as haul trucks, and then analyzed how these emissions would affect the closest sensitive downwind receptor. This particular receptor was selected for analysis as these types of emissions are transported by the wind, and thus emissions would be greatest at downwind locations. As concluded in the Draft EIR, the Project would not emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million and, therefore, impacts attributable to TAC emissions would be less than significant (Draft EIR, page 541). Furthermore, it is concluded that TAC emissions during construction, which as with all emissions are based on exterior (outdoor) conditions, would not exceed health risk thresholds in the vicinity of the Project site, including the skid row community.

In sum, the Draft EIR does not distinguish between the most and least healthy residents, since the assumption is that all sensitive receptors could be equally affected. For instance, the Draft EIR does not discern between the senior residents of Angelus Plaza or younger student occupants of the Colburn School. Neither does the Draft EIR distinguish between these receptors and residents who may be living outdoors in the vicinity of Main Street. The conclusions of significance in the Draft EIR with regard to construction air quality impacts would apply equally to all residential and other sensitive receptor locations in the Project area, including, but not limited to those discussed in this comment. The air quality analysis in the Draft EIR addresses these air quality issues for the Project itself and the cumulative impact with related projects under CEQA and no additional analysis is required.

**SPEAKER NO. 4**

Genera Dogon

**RESPONSE NO. M-4-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on this Project. Your comment concurs with the conclusion of the Draft EIR that "increased activity within the revitalized Civic Park would likely result in an increased demand for police protection services" (Vol. 2, page 645). However, the comment also expresses the view that private security may or may not increase demand for city police services. As stated in the Draft EIR, under the proposed Project, it is anticipated that activity in the Civic Park would increase on both a daily basis and during special events. The Civic Park, as is the case with the current facility, is County property and as such, is under the jurisdiction of the County's Office of Public Safety. As the current Civic Center Mall is currently used extensively on a daily basis, the additional increase in activity on a daily basis is not anticipated to increase to such an extent so as to exceed the capabilities of the County Office of Public Safety. During special events, when the numbers of people using the park would increase substantially, the County or its park operator would use private security personnel to supplement police services during these events and, therefore, reduce the demand on police services created by these large events. The use of additional security staff would be commensurate with the size of the event. On this basis, the Draft EIR concludes that Project development would not increase the demand for police protection services over existing conditions.

**RESPONSE NO. M-4-2**

The comment states the concern that the use of private security personnel would reduce access to the park by all downtown residents and cites concerns over Pershing Square in the City. One of the Project's objectives (see page 97 of Volume 1 of the Draft EIR) is to:

> "Improve and expand the existing Los Angeles County Mall into a Civic Park so that it can be operated to serve as an active, welcoming setting for daily activity as well as a gathering place for community celebrations, cultural and ethnic celebrations, festivals, holiday events, political gatherings and the like."

Access to the park would be governed by a set of rules that are consistent with those used throughout public parks in the area. Those who comply with the posted rules will not be denied access to the park, whereas on the other hand, those individuals who chose not to comply with the rules would, out of courtesy to others, be required to leave the park. Including this transcribed comment and response in the Final EIR accommodates the speaker's request that these comments be included in the Final EIR, and the speaker's concerns and comments will be incorporated into the Final EIR for the review and consideration of the Project's decision-makers.

**SPEAKER NO. 5**

Roberto Carbajal

**RESPONSE NO. M-5-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on this Project. Your comment expresses the concern that local qualified workers may not be hired for the Project's construction phases. The Authority would like to take this opportunity to correct an error on the bottom of page 40 of the transcript of your comments in which you requested that there be a special office or "employment czar" for the Project (the transcript should read "employment czar" and not "employment draw").

With regard to local hiring practices, it is important to note that the Project Developer plans to have a local hiring program. While they are currently working on the specifics of such a program, the program is not finalized and so no details are available at this time. As indicated in Response No. M 1-1, however, it is anticipated that the CRA/LA job hiring requirements for the Developer in relation to its local hiring program would be included in recommended contract actions. Although not required by CEQA as a CEQA mitigation measure, representatives from the City, County, CRA/LA and the developer are now working on the creation of a job outreach and training program that would provide opportunities for local residents to access both the construction and permanent jobs created by the Grand Avenue Project. The developer has offered funding assistance for jobs programs tied directly to the Grand Avenue Project. To supplement this commitment the City, County and CRA/LA are examining both in-kind and actual cash contributions to create an effective local hiring and training program. You may also be interested in other responses on this issue. See also, for example, Response Nos. M-1-1, 13-23 and 13-33.

**SPEAKER NO. 6**

Samuel Sanchez

**RESPONSE NO. M-6-1**

Thank your for your attendance and comments at the July 18, 2006 public meeting on this project. Your comments express concern regarding the project's relationship to sustainability of the environment. The importance and benefits of sustainable development are recognized and have been incorporated into the project. For example, the project is an infill development built in the middle of the existing downtown Los Angeles urban environment. As discussed in the Draft EIR, development of the range of uses included within the project as well as its location in the downtown area would reduce traffic, the length of trips, and demands on infrastructure and public services, compared to a development of similar scale in a suburban or outlying area. By locating within an existing urban center, the project would promote sustainability for future generations by preserving rural, agricultural, recreational and environmentally sensitive areas, and accommodates growth that uses resources efficiently, and significantly reduces waste (refer to Draft EIR, Vol. 1, Section IV.a, Table 10, page 205). In addition, the project would incorporate landscaping and street trees on the five development sites that currently are entirely paved and would implement an energy conservation program within the project's buildings consistent with the current requirements of the 2005 California energy code (Title 24), which would reduce energy demand by approximately 15 percent compared to former Title 24 requirements. With the implementation of the current version of Title 24, the Project would reduce its demand on non-renewable resources as well as reduce the Project site's contribution to the urban heat island effect that currently exists in the downtown Los Angeles area. As such, the Project would contribute to environmental sustainability. In addition to the analysis and relevant design and mitigation in the Draft EIR relating to sustainability and energy conservation (see Response No. 13-4), the Authority and member agencies will also address these issues in the design and development criteria imposed on the developer through recommended contract actions on the Project.

**RESPONSE NO. M-6-2**

The comment expresses a concern, based upon your personal experience with construction downtown at another project and location, that concrete and asbestos demolition can lead to health effects like silicosis, that particulates can come from dust from haul loads, and that it is your experience that abatement practices were not always followed. It is the intent of the

Mitigation Monitoring and Reporting Program (MMRP) (Final EIR, Section III), to assure that dust abatement procedures are fully implemented. Mitigation Measure F-1 would reduce dust emissions through a variety of measures, including watering, fencing, the use of stabilizers, covered truckloads, street sweeping, and other measures. It is also expected that existing regulatory measures described in the Draft EIR for the handling and transport of any hazardous materials would be duly enforced by the responsible agency (Regulatory Measures H-1 through H-6, pages 618-620) and that the oversights that occurred at the referenced construction site would not be repeated during the construction of the proposed Project.

**SPEAKER NO. 7**

Sister Diane Donaghue

**RESPONSE NO. M-7-1**

Thank your for your attendance and comments at the July 18, 2006 public meeting on the Grand Avenue Project. The comment states that your perspective is not just about the environment and mitigation but, also, about people and sustainable development. Your comments questioning who is impacted by the Project, who pays for the impact, and who benefits, provide the introductory context for the opinion, stated later, that the Draft EIR does not identify populations or individuals who are specifically or indirectly impacted by the Project. The views expressed in the comment are addressed in Responses Nos. M-7-2 and M-7-3. Within this context, the following comments are primarily concerned with the connection between the impacts and benefits of the Project and the "underserved, underhoused, and underemployed of Skid Row."

**RESPONSE NO. M-7-2**

The comment expresses the view that the Project is uniquely situated so as to allow for a strong nexus between transportation, housing, and jobs so as to produce meaningful results. The Authority agrees with this observation, which is consistent with the intent of the Project which, due to the geographic location of the Project in the city center, has the stated objective to provide, and would provide, a substantial amount of housing, inclusive of affordable housing, that would expand the diversity of downtown living options and would provide housing for workers, among others, who seek a living environment near their places of work (see page 97 of Volume 1 of the Draft EIR). The comment is also consistent with the objective of the Project to improve the downtown jobs/housing balance (see page 99 of Volume 1 of the Draft EIR), which would have the indirect result of reducing vehicle miles traveled and overall traffic. However, the comment expresses the opinion that the Draft EIR does not provide a level of detail that would provide meaningful results. Specifically, the comment states that the EIR needs to build a stronger nexus between transportation, housing, and jobs; specifically between the benefits that may be derived from the Project and the "underserved, underhoused, and underemployed of Skid Row."

The provision of a large amount of housing, of which 20% would be affordable housing, represents a very important contribution of the Project in terms of creating sustainable development that establishes a meaningful nexus with transportation and jobs. By locating a large amount of housing within the downtown Los Angeles job market, multiple benefits for all of Los Angeles would accrue as the proximity of new housing to existing and new jobs would create opportunities for a reduction in vehicle trips which in turn would improve air quality and noise conditions for all those who are involved with the downtown Los Angeles area. These benefits would also accrue by locating retail uses as part of the Project, which would allow for some of the shopping needs of the residents to be met by walking rather than by driving. Also of important note is the placement of the Project in proximity to various forms of public transit, which will also have a substantial benefit in terms of reducing motor vehicle trips. Furthermore, the statement that a stronger relationship needs to be built between the benefits of the Project that would be derived the City's "underserved, underhoused, and underemployed" in the community is not clear. The City's "underserved, underhoused, and underemployed" community would benefit from the renovation and expansion of Civic Mall, which would be available to all residents of the City, and from the provision of affordable housing, for which some members of this community may qualify. Benefits to the community would also accrue as a result from the Developer's plans to have a local hiring program. See Response M-1-1 above relating to job hiring and outreach as well as Response Nos. 13-2, 13-23 and 13-33 on this issue and CEQA. No further evaluation of the Project's environmental effects in relation to this community is required.

**RESPONSE NO. M-7-3**

The comment cites the approximately 90 related projects and states that traffic is one of the most intransigent and complex environmental impacts due to the enormous development boom in downtown Los Angeles. The comment is also made that the County is the largest employer within a small radius of the Project, and the largest benefactor of skid row. The comment also expresses that the EIR should make a stronger nexus between the Project and the inclusion of traffic mitigation measures that increase Project viability and community benefits. Please see Response No. 13-2 for a discussion of the constraints on mitigation measures for CEQA purposes.

The Draft EIR complies with all CEQA requirements by evaluating transportation issues to the level of detail needed to support the conclusions of the Draft EIR (refer to Section IV.B of Volume 1 and Appendix B in Volume 3 of the Draft EIR). Furthermore, the City's Department of Transportation (LADOT) has reviewed and accepted the Project's traffic study. Also of note, is that the Project's traffic analysis includes the traffic generated by each of the related projects as well as including a growth factor that accounts for increases in traffic not attributable to a

specific development project. As such, the Draft EIR traffic analysis represents a conservative forecast of future conditions as it assumes that all of the related projects are constructed, when in reality, it is likely that will not be the case. Further, the traffic analysis is also conservative in that while it includes the traffic attributable to all of the related projects, per LADOT requirements, the traffic analysis does not include the mitigation measures that would be required for those related projects that result in significant traffic impacts. While the Draft EIR concludes that the Project's traffic impacts would be significant, it is important to note that of the seven significant impacts in the A.M. peak hour, three intersections would continue to operate at LOS D or better and four intersections would operate at LOS E (three of which would operate at LOS E without the Project) (see definition of service levels on page 216, Draft EIR, Vol. 1, Section IV.B). Of the seventeen significant impacts in the P.M. peak hour, ten intersections (the majority) would continue to operate at LOS D or better, four would operate at LOS E (two of which would operate at LOS E without the Project), and three would operate at LOS F (of which two would operate at LOS E without the Project and one that would operate at LOS F without the Project).

With respect to conditions after mitigation, the Draft EIR traffic analysis (Vol., Section IV.B, Traffic and Circulation, pages 322-326) concludes that the Project with County Office Building Option, would cause one significant impact in the A.M. peak period, where the resultant level of service would be LOS D; and that of the thirteen remaining significant impacts in the P.M. peak hour, nine intersections (the vast majority) would operate at LOS D or better. Two of the nine intersections would operate at LOS E and two would operate at LOS F. The comment fails to mention that the Draft EIR traffic analysis also concludes (Vol. 1, Section IV.B, Traffic and Circulation, page 328) that the Project with Additional Residential Development Option would cause fewer remaining significant traffic impacts. No remaining significant traffic impacts would occur in the A.M. peak hour and, of seven remaining significant traffic impacts in the P.M. peak hour, six intersections would operate at LOS or better, and one intersection would operate at LOS F.

Based on further discussions with the City of Los Angeles' Department of Transportation (LADOT), it has been determined that a physical roadway improvement is feasible at the intersection of Hill Street and Third Street. With the implementation of this additional mitigation measure, the number of significant unavoidable impacts in the P.M. peak hour for the Project with County Office Building Option would be reduced from the 13 locations identified in the Draft EIR to 12 locations. Therefore, and on an overall basis, there would still be one significant unavoidable impact in the A.M. peak hour and 12 significant unavoidable impacts in the P.M. peak hour.

**SPEAKER NO. 8**

Gilda Haas

**RESPONSE NO. M-8-1**

Thank your for your attendance and comments at the July 18, 2006 public meeting on this project and your concurrence with the comments made by Sister Donaghue. Please refer toResponse Nos. M-7-1 through M-7-3.

**SPEAKER NO. 9**

Alberto Tlatoa

**RESPONSE NO. M-9-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on this Project. Your comments express the concern that parking for the park would be so expensive that it would reduce park use. The cost of parking is an economic issue and is therefore properly beyond the scope of the EIR's analysis of the Project's potential physical parking impacts. However, the expanded civic park and the Project site are located in an area of the City that is well served by public transit such as the Metro Red Line and bus service including, but not limited to bus lines operated by the MTA as well as the LADOT's DASH service. For example, the Metro Red Line subway directly serves the park, and the Civic Center Station for the Red Line has portals at two locations within the Project boundaries. The first location, or the northern portal of the Civic Center Station is at the north edge of the Court of Flags, the central parcel of the civic park and the second location, the southern portal of the Civic Center Station is within Parcel W-2 of the Project site, at the southwest corner of Hill and First Streets. Also, as described in the Draft EIR, two DASH shuttle routes and other local and regional bus lines are located adjacent to the park and a broad network of public transit from throughout the region would connect to the Red Line and DASH systems. Furthermore, the ultimate goal of the Project is to improve access to the public open spaces that would be developed as part of the Project, such as the Civic Park. As a result, accommodating access to the proposed Civic Park by all is an integral component of the proposed Project. The speaker's concerns and comments will be incorporated into the Final EIR for the review and consideration of the Project's decision-makers.

**RESPONSE NO. M-9-2**

The comment asks about the type of businesses that would locate within the Project site with an expressed interest in those businesses that would offer healthy food and snacks in the area. An objective of the Project is to have a broad mix of uses, including uses that complement each other and that add to those that already exist in the area (Draft EIR, Vol. 1, page 95). The intent of the Project is to provide a range of commercial uses that would serve the Project's range of residents, as well as visitors to the area. The speaker's comments regarding a healthy selection of food and snacks will be considered with respect to Civic Park and other public

venues and will be incorporated into the Final EIR for the review and consideration of the Project's decision-makers.

**RESPONSE NO. M-9-3**

The comment states that it is already expensive to live downtown and requests information regarding the Project's low-income requirements. It is proposed that 20 percent of the housing units to be built as part of the Grand Avenue Project would be affordable to very low and low-income households. The affordable units in Phase I of the Project are contemplated to be rented to low and very-low income households, as determined by the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD). For illustrative purposes only, the affordable units for Phase I at current HUD levels are proposed to be rented to households earning not more than $27,700 (50 percent of the median income for Los Angeles County) for a two-person household and $34,650 (50 percent of the median income for Los Angeles County) for a four-person household. These income levels are for 2006 and may be adjusted on an annual basis by HUD and/or HCD. The income levels listed are the maximum income levels for Phase I and the Project may provide affordable units restricted to even lower income and rent levels.

**SPEAKER NO. 10**

Russell Brown

**RESPONSE NO. M-10-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on behalf of the Residents Association of Downtown Los Angeles. As the president of the Downtown Residents Association, your comments express the Association's support for the Project and state that the Association is looking forward to the Civic Park.. Your comments also express appreciation for the participation of the architect, Frank Gehry, in the Project.

The comments also express the view that community-serving retail is desperately needed downtown. As discussed in the Draft EIR, an objective of the Project is to have a broad mix of uses, including uses that complement each other and that add to those that already exist in the area (Draft EIR, Vol. 1, page 95). The intent of the Project is to provide a range of commercial uses that would serve the Project's range of residents, as well as visitors to the area. The speaker also expresses support for the Project's new housing as a complement to the Bunker Hill area in general, and, in particular, the Project's affordable housing component. The comment speaker also supports the contribution of the Project to a sense of place, which is currently missing and refers to the benefit of locating the Project adjacent to public transportation, including the Red Line subway. In conclusion, the speaker said that the Association looks forward to the creation of a new neighborhood and a place to accommodate large civic events that could have worldwide recognition. These comments will be forwarded to the public agency decision makers before any action is taken on the Project.

**RESPONSE NO. M-10-2**

The comment raises the question that if the Project includes replacement office space for the County, why isn't it treated like an "even exchange" for the current Hall of Administration building instead of a new impact. In response, if the current Hall of Administration County staff were moved to a new County Office Building on Parcel W-2, as analyzed, the vacated building would have the potential to be re-occupied at the current level. Therefore, the move to the new County Office Building is evaluated as a net increase. Also of note is that significant traffic

impacts would also occur, if there is no County office building on Parcel W-2, under the Additional Residential Development Option evaluated in the Draft EIR although the types of impacts would vary due to differences in traffic volumes and travel patterns.

**SPEAKER NO 11**

Ben Beach

**RESPONSE NO. M-11-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on behalf of the Legal Aid Foundation. Your comments introduce two points about the Draft EIR. The first pertains to construction emissions and the harmful effects associated with the exposure of downtown residents to particulate matter from diesel emissions, while the second relates to energy. Concerns regarding construction emissions are addressed in this response, while the comments regarding energy are addressed in the following response.

With regard to the issue of particulate matter from diesel emissions, the request is to add two additional mitigation measures. The first addresses the use of diesel particulate filters, while the second addresses the use of selective catalytic reduction systems on construction equipment. In response to this request an additional mitigation measure has been added to the Final EIR. Specifically, there will be a mitigation measure requiring the use of diesel particulate filters and selective catalytic reduction systems (e.g., catalytic converters) to mitigate particulate matter emissions for major earth moving equipment, haul trucks, and excavation equipment, since these are the primary source of the Project's construction emissions. Please refer to Section II, Mitigation Monitoring and Reporting Program and Section IV. Corrections and Additions, Subsection IV.F, Air Quality, of this Final EIR with regard to the inclusion of this additional mitigation measure.

**RESPONSE NO. M-11-2**

The comment expresses the view that the Draft EIR inadequately analyzes the Project's energy impacts and also that the Project should contain what are referred to as "green buildings" and specifically urges that the Project be LEED certified. These concerns have been addressed in detail in response to a written comment on the Project by this speaker. Please refer to Response to Comment 13-4 concerning the adequacy of the Project's energy analysis and the suggestion that the LEED building rating system apply to the Project, as well as Response No. M-6-1 on energy sustainability for the response to this comment. No further analysis in this Final EIR is required, and your comments will be provided to decision makers before any action on the Project.

**SPEAKER NO. 12**

Esther Alejandro

**RESPONSE NO. M-12-1**

Thank you for your attendance and comments at the July 18, 2006 public meeting on the Grand Avenue Project.. Your comment expresses the view that local hiring would reduce construction emissions and traffic impacts Please refer to Response to Comment M-1-1 for the response to this comment.

**SPEAKER NO. 13**

Benjamin Torres

**RESPONSE NO. M-13-1**

Thank your for your attendance and comments at the July 18, 2006 public meeting on the Grand Avenue Project. Your comment expresses the concern that the Project will cause the downtown area to be less affordable. The comment also states that if the cost of living in the downtown area increased, people would not be able to afford to go to these types of shopping centers and retail spaces, and that its residents would vacate the downtown. With respect to the concern regarding affordability, the Project ensures that 20 percent of all residential units in the project are affordable units for low-income residents. Furthermore, it is an expressed objective of the Project to develop a substantial amount of housing, inclusive of affordable housing, in order to expand the diversity of downtown living options (Draft EIR, page 97). It is also an objective of the Project to implement redevelopment plan objectives to provide that the proposed residential area of the project be developed to provide housing, among others, for workers who seek a living environment near their places of work as well as near the available cultural, educational and entertainment facilities (Draft EIR, Vol. 1, page 99). The intent of the Project is to provide a range of housing opportunities to attract residents from various income levels, including middle-income residents, to the downtown area and to increase diversity and activity.

**RESPONSE NO. M-13-2**

The comment states the concern that the repercussions of residents leaving the downtown area would be the loss of social capital in a community where people can actually contribute to change and be part of the transition to make the downtown a livable place for everyone. It is the intent of the Project and the City's Planning Department and CRA/LA, as described in their adopted land use plans for the area, including the Central City Community Plan, the Bunker Hill Design for Development, the General Plan Framework, the Downtown Strategic Plan and other adopted programs, to revitalize downtown Los Angeles and make it a livable place. In addition, refer to Response No. M-13-1 for information regarding the positive impacts resulting from the provision of housing in the downtown area. The speaker's concerns regarding the future of downtown Los Angeles will be incorporated into the Final EIR for the review and consideration of the Project's decision-makers.

**Tracking Number:**

**THE LOS ANGELES GRAND AVENUE AUTHORITY**
**CALIFORNIA ENVIRONMENTAL QUALITY ACT**
**DRAFT ENVIRONMENTAL IMPACT REPORT FOR**
**THE GRAND AVENUE PROJECT**

# *COMMENT FORM*

*COMMENT AUTHOR (Please print.)*

**Name** *(Last, First or Org.)*: Chor, Tay – Montebello Bus Lines | **Date:** 7/18/06

**Address:** 406 S. Taylor Ave.

**City:** Montebello | **State:** CA | **Zip Code:** 90640

**Comment(s):**

Please address the following concerns:

1. What is the notification process for construction? We will need minimum of 72 hours to make detours for our bus routes. CF-1-1

2. What is the expected duration of the construction? CF-1-2

*Attach additional sheets if necessary.*

**Please submit comments by August 3, 2006 to:**
**The Los Angeles Grand Avenue Authority**
**c/o California Community Foundation**
**445 South Figueroa Street, Suite 3400**
**Los Angeles, CA 90071**

# V. RESPONSES TO COMMENTS
# C. PUBLIC MEETING COMMENT FORM

## COMMENT FORM NO. 1

Tay Char, Montebello Bus Lines

## RESPONSE NO. CF-1-1

The comment inquires about the notification process during Project construction and requests that a minimum of 72 hours be given to the Montebello Bus Lines to allow for the creation of detours for their bus lines. With respect to construction notification, Mitigation Measure B-1 (Draft EIR, Vol. 1, page 317) identifies that the Developer will prepare a Construction Traffic/Control Management Plan, to be approved by LADOT. It is not anticipated that construction of the Project would necessitate any changes in bus routes in the area. The Traffic Study in the Draft EIR (Vol. 3, Appendix B, page 108) does, however, identify the potential need to relocate certain bus stops and concludes that, as they could all be temporarily relocated within ¼ mile of the original location, there would be no significant impacts on bus stop locations. The Traffic Study was not specific as to the actual places for relocation of the stops, because that will need to be worked out with the transit operators and with LADOT, as part of the Construction Traffic Control/Management Plan in Mitigation Measure B-1, based on the specifics of the construction program. The Project developer will work with the operator of the Montebello Lines as a part of the preparation of that plan, to identify the most feasible and convenient location for any bus stops in the Project area which require temporary relocation because of Project construction activity. Montebello Bus Lines will therefore have sufficient advance notice (and considerably in excess of 72 hours) of any such changes.

## RESPONSE NO. CF-1-2

The comment requests information regarding the expected duration of Project construction. With respect to the duration of Project construction, the Project Description provided in the Draft EIR (Vol. 1, page 128), states that the approximate timeline for the Project's three development phases would be late 2006-2009 for the first phase; 2010-2012 for the second phase; and 2013-2015 for the third phase. Under this scenario, the duration of the combined phases would be 9 years. Notwithstanding, the potential exists that construction of the

Project's second phase could be accelerated in response to changing market conditions. In the event that the overall construction schedule is accelerated, the second phase of the Project would commence in 2008 rather than 2010. Also under the accelerated scenario, the second phase would overlap part of the first phase, but the duration of each phase would remain at 36months and the timing of the last phase would be unchanged.

# Appendix A:
# Copies of Letters Submitted, Public Meeting Transcript and Public Meeting Comment Form

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

RECEIVED AUG 0 4 2006

July 31, 2006

Martha Welborne
Los Angeles Grand Avenue Authority
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Subject: The Grand Avenue Project
SCH#: 2005091041

Dear Martha Welborne:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 28, 2006, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

# Document Details Report
## State Clearinghouse Data Base

**SCH#** 2005091041
**Project Title** The Grand Avenue Project
**Lead Agency** Los Angeles Grand Avenue Authority

**Type** EIR Draft EIR

**Description** The proposed project includes the creation of a Civic Park that improves and expands upon the existing Los Angeles County Civic Mall, streetscape improvements along Grand Avenue between Fifth Street and Cesar Chavez Avenue to attract and accomodate more pedestrian traffic; and the development of five parcels. The project consists of two development options: the Project with County Office Building Option and the Project with Additional Residential Development Option. Under the Projet with County Office Building Option, up to 2,060 residential units, including up to 412 affordable units; up to 449,000 square feet of retail floor area; up to 275 hotel rooms; and a County Office Building containing up to 681,000 square feet, would be cosntructed. Under the Project with Additional Residential Development Option, up to 2,660 residential units, including up to 532 affordable units; up to 449,000 square feet of retail floor area, and up to 275 hotel rooms would be constructed. The County Office Building would not be constructed under the Project with Additional Residential Development Option. The total floor area to be developed under both Options is 3.6 million square feet. All proposed parking would be provided in podium and subterranean parking structures.

## Lead Agency Contact


**Name** Martha Welborne
**Agency** Los Angeles Grand Avenue Authority
**Phone** 213-452-6219 **Fax**
**email**
**Address** 445 South Figueroa Street, Suite 3400
**City** Los Angeles **State** CA **Zip** 90071


## Project Location

**County** Los Angeles
**City** Los Angeles, City of
**Region**
**Cross Streets** Grand Ave, Hope St, Olive St, Hill St, Spring St, Broadway, 1st St, 2nd, 3rd, 4, 5th, 6th, etc.
**Parcel No.**
**Township** **Range** **Section** **Base**

## Proximity to:

**Highways** SR110, US 101
**Airports**
**Railways** Metro, Amtrak
**Waterways** Los Angeles River
**Schools** LAUSD (multiple)
**Land Use** Parking and Park / C2-4D, R5-4D, OS-2D / Regional Center Commercial and Open Space

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Supply; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Department of Health Services; Integrated Waste Management Board; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

**Date Received** 06/14/2006 **Start of Review** 06/14/2006 **End of Review** 07/28/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

August 3, 2006

RECEIVED
AUG - 7 2006

Martha Welborne
Los Angeles Grand Avenue Authority
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Subject: The Grand Avenue Project
SCH#: 2005091041

Dear Martha Welborne:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on July 28, 2006. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2005091041) when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7
100 MAIN STREET, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337
TTY (213) 897-4937

*Flex your power!*
*Be energy efficient!*

July 31, 2006

IGR/CEQA cs/060612 –DEIR
City of Los Angeles
The Grand Avenue Project
Grand Avenue/Civic Center
Vic. LA-101-1.30; SCH # 2005091041

Ms. Martha Welborne
The Grand Avenue Authority
c/o California Community Foundation
445 S. Figueroa St., Suite 3400
Los Angeles, California 90071

Clear 7-28-06 Lafc

RECEIVED
AUG 0 3 2006
STATE CLEARING HOUSE

Dear Ms. Welborne:

Thank you for including the California Department of Transportation in the environmental review process for The Grand Avenue Project Draft Environmental Impact Report. The project implementation plan involves development of 4 publicly owned parcels and 1 privately owned parcel along Grand Avenue within the Los Angeles Civic Center area. The Grand Avenue project site includes the US-101 - Hollywood Freeway near the northern boundary and I-110 - Harbor Freeway along the western boundary. The project with County building option consists of up to 2060 residential condominium units with 20% affordable housing, up to 275 room hotel, up to 449,000 sq. ft. of retail space, up to 681,000 sq. ft. of County offices. Under the additional residential option, the County office space would be replaced by up to 600 additional residential units, with 20% affordable units. Based on the information received, we have the following comments:

Items 1b:

The project traffic analysis indicates (as shown in table 23 and 24, pages 281 and 282) that the project trip generation would cause an incremental increase in the volume/capacity ratio of 0.021 for the US-101 Hollywood Freeway between Grand Avenue and Hill Street and an V/C ratio of 0.020 at the US-101 Hollywood Freeway north of Vignes Street. Both locations are for the southbound direction on the US-101 Freeway during the PM peak period as indicated on Page 243. If the volume to capacity ratio is greater than or equal to 0.02, the additional traffic volumes will cause or worsen the existing level-of-service (LOS) "F" condition.

We ask that you consider having developers contribute to a fair-share funding program to be used for constructing an additional freeway lane by widening the freeway or if feasible, modifying the lane striping for the southbound US-101 Freeway.

We recommend that construction related truck trips be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will nee a Caltrans Transportation Permit.

Any work to be performed within Caltrans Right-of-way will need a Caltrans Encroachment Permit.

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/060612 and do not hesitate to contact me at (213) 897-3747.

Sincerely,

*Original Signed By*

Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7
100 MAIN STREET, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337
TTY (213) 897-4937

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July 31, 2006

IGR/CEQA cs/060612 –DEIR
City of Los Angeles
The Grand Avenue Project
Grand Avenue/Civic Center
Vic. LA-101-1.30; SCH # 2005091041

Ms. Martha Welborne
The Grand Avenue Authority
c/o California Community Foundation
445 S. Figueroa St., Suite 3400
Los Angeles, California 90071

Dear Ms. Welborne:

Thank you for including the California Department of Transportation in the environmental review process for The Grand Avenue Project Draft Environmental Impact Report. The project implementation plan involves development of 4 publicly owned parcels and 1 privately owned parcel along Grand Avenue within the Los Angeles Civic Center area. The Grand Avenue project site includes the US-101 - Hollywood Freeway near the northern boundary and I-110 - Harbor Freeway along the western boundary. The project with County building option consists of up to 2060 residential condominium units with 20% affordable housing, up to 275 room hotel, up to 449,000 sq. ft. of retail space, up to 681,000 sq. ft. of County offices. Under the additional residential option, the County office space would be replaced by up to 600 additional residential units, with 20% affordable units. Based on the information received, we have the following comments:

Items 1b:

The project traffic analysis indicates (as shown in table 23 and 24, pages 281 and 282) that the project trip generation would cause an incremental increase in the volume/capacity ratio of 0.021 for the US-101 Hollywood Freeway between Grand Avenue and Hill Street and an V/C ratio of 0.020 at the US-101 Hollywood Freeway north of Vignes Street. Both locations are for the southbound direction on the US-101 Freeway during the PM peak period as indicated on Page 243. If the volume to capacity ratio is greater than or equal to 0.02, the additional traffic volumes will cause or worsen the existing level-of-service (LOS) "F" condition.

We ask that you consider having developers contribute to a fair-share funding program to be used for constructing an additional freeway lane by widening the freeway or if feasible, modifying the lane striping for the southbound US-101 Freeway.

We recommend that construction related truck trips be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will nee a Caltrans Transportation Permit.

Any work to be performed within Caltrans Right-of-way will need a Caltrans Encroachment Permit.

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/060612 and do not hesitate to contact me at (213) 897-3747.

Sincerely,

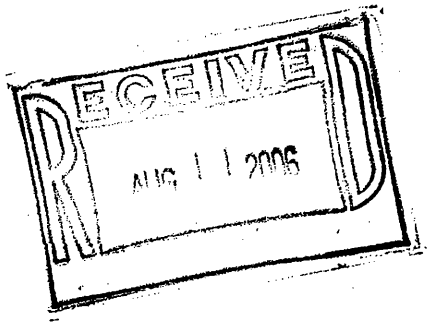
Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

State of California - The Resources Agency ARNOLD SCHWARZENEGGER, *Governor*

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

August 8, 2006




Ms. Martha Wellborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

**Draft Environmental Impact Report for**
**The Grand Avenue Project**
**Los Angeles County**

Dear Ms. Wellborne:

The Department of Fish and Game (Department) has reviewed the Draft Environmental Impact Report (DEIR) for the above referenced proposed project relative to impacts to biological resources. The project proposal includes the development of a revitalized Civic Park and development of five additional parcels. The project is located in downtown Los Angeles. The project site consists of the Grand Avenue Right-of-Way, between 5th Street and Cesar Chavez Avenue, the Los Angeles Civic Center Mall, between Spring Street and Grand Avenue, and five non-contiguous parcels located in the Bunker Hill Redevelopment Project Area.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under the California Environmental Quality Act (CEQA), Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq) and Fish and Game Code Section 1600 et seq.:

**IMPACTS TO BIOLOGICAL RESOURCES**

1. Impacts to Nesting Native Birds - The IS states that the project may result in the removal or relocation of mature landscaping, including trees.

   a. The proposed project may impact native bird species. Urban landscaping is often the only habitat available for migratory nongame native bird species and are used as migratory stopover sites and nesting habitat. Migratory nongame native birds are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918(50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

   b. Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 and as

early as February 1 for raptors. The provision will help to avoid take, including disturbances which would cause abandonment of active nests containing eggs and/or young. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

c. If project activities cannot be scheduled to avoid the breeding bird season, the Department recommends that beginning thirty days prior to the disturbance of suitable nesting habitat the project proponent should arrange for weekly bird surveys to detect any protected native birds in the habitat that is to be removed, and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors). The surveys should be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys should continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/ construction work. If a protected native bird is found, the project proponent should delay all clearance/ construction disturbance activities in suitable nesting habitat or within 300 feet of nesting habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests), or as determined by a biological monitor should be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting.

   The distance limits of construction to avoid a nest should be identified in the field with flagging and stakes or construction fencing. Construction personnel should be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above, in order to document compliance with applicable State and federal laws pertaining to the protection of native birds.

The Department recommends that the above concerns be addressed prior to lead agency approval of the proposed project.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Associate Wildlife Biologist, at (626) 797-3170.

Sincerely,

Larry L. Eng, Ph.D.
Regional Manager

SOUTHERN CALIFORNIA

**ASSOCIATION of GOVERNMENTS**

**Main Office**

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

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www.scag.ca.gov

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**Riverside County:** Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

**San Bernardino County:** Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon; Highland • Deborah Robertson, Rialto • Alan Wapner, Ontario

**Ventura County:** Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

**Orange County Transportation Authority:** Lou Correa, County of Orange

**Riverside County Transportation Commission:** Robin Lowe, Hemet

**Ventura County Transportation Commission:** Keith Millhouse, Moorpark

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3 August 2006

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Ste 3400
Los Angeles, CA 90071

RE: SCAG Comments on the Notice of Availability of a Draft Environmental Report for the Grand Avenue Project
SCAG No. I 20060408

Dear Ms. Welborne:

Thank you for submitting the Draft Environmental Impact Report for the Grand Avenue Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans.

SCAG staff has evaluated your submission for consistency with the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). In Volume 2, Section IV, the draft EIR addresses SCAG's policies and forecasts appropriately and has provided sufficient explanation of how the project helps meet and support regional goals. Based on the information provided in the EIR we have no further comments.

A description of the proposed Project was published in the June 16-30, 2006 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have questions, please feel free to contact me at (213) 236-1858. Thank you.

Sincerely,

April Grayson
Associate Regional Planner
Intergovernmental Review

DOCS# 125268

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Date: August 2, 2006

To: Ms. Martha Welborne
Los Angeles Grand Avenue Authority

From: Steve Smith, Ph.D. Steve Smith
Program Supervisor,
CEQA Section, SCAQMD

**Subject: The Grand Avenue Project DEIR**

South Coast Air Quality Management District (SCAQMD) staff intends to submit comments on the above-mentioned document by tomorrow, Friday, August 4, 2006. SCAQMD staff hopes you will consider the comments as part of the official record in finalizing the environmental impact report for the proposed project.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

**FAXED: AUGUST 3, 2006**

August 3, 2006

Ms. Martha Welborne
The Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

**Draft Environmental Impact Report (DEIR) for The Grand Avenue Project: Los Angeles: June 2006**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be willing to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith

Steve Smith
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
LAC060614-04
Control Number

**Draft Environmental Impact Report (DEIR) for**
**The Grand Avenue Project, Los Angeles: June 2006**

1. **URBEMIS Model Results**: In footnote (a) to Table 57, the lead agency states that the construction emissions quantities are taken from the URBEMIS model printout sheets and/or calculation worksheets presented in Appendix D. Please note that the URBEMIS model printout sheets in Appendix D do not include construction emissions. They show only operational emissions. As a result, SCAQMD staff could not verify construction emissions from the proposed project. Please provide the URBEMIS construction output printout in the Final EIR.

2. **Parcel Q**: On page 116 of the DEIR, there appears to be a typographical error regarding the area of Parcel Q, which is shown as 1.1.14 million square feet of space.

3. **Carbon Monoxide (CO) Hot Spots:** Table 59 on page 545 of the DEIR reports CO concentrations for the intersection of Figueroa Street and Third Street. However, a CO hotspots analysis was not found for this intersection in the appendices. SCAQMD staff is therefore unable to verify the CO hotspots analysis for this intersection. The Final EIR should include the details of the CO hotspots analyses for all intersections that are reported in the DEIR and that are impacted by the proposed project.

4. **Traffic Volumes:** The traffic volumes in the CO hotspots analysis do not appear to match those in the Traffic Report. The traffic volumes in the Final EIR should be consistent.

5. **Reducing Construction Emissions**: Because construction emissions from the proposed project are estimated to exceed the daily significance thresholds during construction for nitrogen oxides ($NO_X$), carbon monoxide (CO), volatile organic compounds (VOC) and particulate matter ($PM_{10}$), even after the implementation of the recommended mitigation measures as stated on page 566 of the DEIR, SCAQMD staff recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce air quality impacts from the proposed project. Given that the air basin is designated non-attainment with respect to ozone and $PM_{10}$, it is important that the lead agency consider these changes.

   - Mitigation Measure F-9 should be modified to include trucks not idling in excess of five minutes to be consistent with state law.
   - Mitigation Measure F-2 should be modified to consider restricting the number of gallons of coatings used per day. The lead agency should also encourage water-based coatings or coatings with a lower VOC content than 100 grams per liter.

Finally, consider using materials that do not need to be painted or are painted prior to transporting to the site.

SCAQMD staff recommends that the lead agency also consider the following mitigation measures where feasible:

- Provide temporary wind fencing around the sites that are being graded/excavated to reduce dirt/dust being blown over to adjoining properties.
- Provide a staging area off-site for construction workers and provide shuttle buses to convey workers to the project site from the staging area.
- Arrange for mobile food caterers to come to the project site during lunch break.
- Provide temporary traffic controls (e.g., flag person) during construction to ensure smooth traffic flows.
- Reroute construction trucks away from congested streets.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity and all emissions related matters. Post a publicly visible sign with name of contact person and telephone number for dust complaints.

# COUNTY OF LOS ANGELES

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN



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August 21, 2006

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
C/O - California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

**DRAFT ENVIRONMENTAL IMPACT REPORT, GRAND AVENUE PROJECT "LOS ANGELES CITY" – (FFER #200600123)**

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, and Forestry Division of the County of Los Angeles Fire Department. The following are their comments:

**LAND DEVELOPMENT UNIT:**

1. This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the County of Los Angeles Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the County of Los Angeles Fire Department.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

DAVID R. LEININGER, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

DRL:lc

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

August 3, 2006,

Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa St., Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

Thank you for the opportunity to comment on the Draft EIR for the Grand Avenue Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

Though the Traffic Impact Analysis (TIA) satisfies the requirements of the 2004 CMP Guidelines, the following should be included in the Final EIR:

1. Table 5-7, "Public Transit Service Capacity Serving the Project Area", of the Traffic Study summarizes transit service and calculates bus capacity using 55 persons per vehicle. The average seating capacity of Metro buses is 40 seats. Metro's existing acceptable load factor and scheduled capacity with standees is 49 persons per vehicle. Performing the calculation with 55 persons per vehicle overstates Metro's transit capacity. Further, the transit capacity stated does not consider whether those seats are filled as they enter the project area; a net capacity comparison cannot be made.
2. Table 5-7, "Public Transit Service Capacity Serving the Project Area", omits Foothill Transit Lines 480, 482, and 486.
3. Considering the overall availability of bus transit service, and the future development of rail in the downtown area, including the Metro Gold Line Eastern Extension, the Exposition Light Rail Transit Project, and other rail projects under consideration, it can be concluded that regional transit capacity would not be exceeded by the proposed projects.
4. LADOT's DASH B and C Shuttle services operating along Grand Avenue and Olive Streets might be negatively impacted by new riders desiring to travel short distances within the Project Area, attracted by DASH's low fare.
5. The development of the Civic Center Park and the scheduling of annual events, festivals, parades and demonstrations causing significant and unavoidable traffic impacts could be mitigated though the use of changeable message signs similar to those installed near Staples Center.
6. All proposed projects and developments should accommodate easy access to and from the Metro Red Line station portals.
7. Construction activities associated with the proposed projects must not interfere with the structural and systems integrity of the Metro Red Line.

8. The construction and operation of the proposed projects, including special events at Civic Center Park, must not be allowed to disrupt the operation and maintenance activities of the Metro Red Line. These activities take place 24 hours a day, seven days a week.
9. As noted on page 108 of the Traffic Report, construction of Parcel L/M-2 might require the temporary relocation of the southbound Grand Avenue stop farside of 2nd Street. For the convenience of passengers who utilize the local and express services along Grand Avenue, the 2nd Street stop may need to be temporarily relocated back to 1st Street adjacent to the Disney Hall. Forcing patrons destined for locations north of 2nd Street, including those who formally used the 1st Street stop, to travel farther south from their destinations will be an undue burden. The Grand Avenue stop farside of 2nd Street should be continued to the extent possible.

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

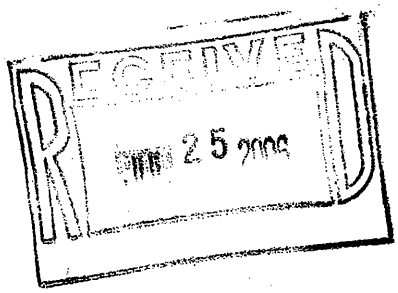
Sincerely,

Susan F. Chapman
Program Manager, Long Range Planning

JOHN A. CLARKE
EXECUTIVE OFFICER / CLERK

111 NORTH HILL STREET
LOS ANGELES, CA 90012-3014

**Superior Court of California**
**County of Los Angeles**




July 24, 2006

Martha Welborne
The Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Grand Avenue Project. The Los Angeles Superior Court as the main tenant of the Stanley Mosk Courthouse will be impacted by this project. While we are confident that issues relative to the Superior Court will be mitigated in a reasonable manner, there are a number of concerns addressed in our questions that we would like you to consider. We look forward to working with you and the County of Los Angeles to complete a project that enhances the downtown area for all residents, employees and visitors.

If you have questions or wish to discuss the comments, please feel free to contact John Van Whervin, Director of Facilities Services and Capital Projects, at (213) 974-5305.

Yours truly,

John A Clarke

John A. Clarke,
Executive Officer

JAC:jvw

Attachment

## Comments on Grand Ave Realignment EIR

| Item | Description | EIR Location |
|---|---|---|
| 1. | A priority objective of the development is to create a 24-hr development. What mitigation exists to deal with the exacerbated homeless issue? | V1, p. 5 |
| 2. | While public parking seems to be covered for the development considerably in this EIR, the issue of employee and juror parking seems to address the existing number of jurors and employees, but no solutions to address growth and additional spaces for employees rather than sending them to Chinatown or other locations to park. | V1, p.7 |
| 3. | Public events during business hours could be disruptive to the operation of the Court. Even weekends could be troublesome. Planning information needs to be shared with the Court in order to allow both court and civic operations to function smoothly. | V1, p.18 |
| 4. | Parking is a serious concern. If the proper amount of parking will only be resolved when the additional development projects in the Civic Center are completed, then this project needs to mitigate the immediate and significant impacts. | V1, p. 22 |
| 5. | If the project will generate in excess of 1500 additional peak hour trips(p. 21), then 3 Share cars hardly seem like a reasonable number. | V1, p. 26 |
| 6. | The development of parcels Q, W1 &W2 will definitely impact the shade/shadows on the courthouse. Later diagrams seem to imply the Courthouse is already fully in shade during the Fall and Winter months. It will now be worse if the developments reach their height limits. This may be a significant but unavoidable impact. | V1, p.29 |
| 7. | Please cite some examples of "high quality materials" | V1, p. 30 |

| | | |
|---|---|---|
| 8. | There is no mention of the impact on the southern views from the courthouse. Many people and photographers view the downtown area from the balcony of the courthouse after lunch at the cafeteria. Significant but unavoidable impact. | V1, p. 30 |
| 9. | While the report describes the removal and replacement of the spiral ramps to Lot 18 from Grand and Hill, I did not see any diagrams or concepts of the replacement ramps. | V1, pp. 36 and 244 |
| 10. | Heavy construction noise during development of parcels Q and W2 will most definitely impact the courthouse. | V1, p. 55 |
| 11. | Did you mean to say that heavy construction will be allowed from 7am to 8am? If as written it is allowed from 7am to 8pm, it will most certainly be disruptive to the courthouse. | V1, p. 58 |
| 12. | LAFD should have discussion with both the County and the Court relative to emergency evacuation plans for both buildings. | V1, p. 66 |
| 13. | General event planning should be shared with the Court, similar to the County's current "Mall Advisory" for events in the Civic Mall. | V1, p. 71 |
| 14. | Lane closures on Grand and Hill for up to 24 months to accommodate ramp reconstruction will impact the courthouse. | V1, p. 89 |
| 15. | Same as 13. Civic Park events without notice could be disruptive. | V1, p.90 |
| 16. | The number of spaces for the County Mall, Lot 10, and the Foltz Building don't seem to add to the 1958 stated on p. 123. | V1, p 135 |
| 17. | Besides the citations in this document, where is a copy of the Los Angeles Civic Center Shared Facilities and Enhancement Plan available? | V1, p. 163 |
| 18. | The Level of Service of the Grand St. signals at Temple and First Street get worse after this development according to Table 12 (p 217) and Table 19 (p. 266). They should be further mitigated. While listed as significant and unavoidable, they should be further researched and mitigated. | V1, p. 217 and V2, p. 853 |

| | | |
|---|---|---|
| 19. | The reconfiguration of the Lot 18 ramps will force southbound traffic on Grand over to Hill and northbound traffic on Hill over to Grand. I do not see how this leaves traffic circulation "unaffected". | V1, p. 245 |
| 20. | If 600+ construction workers will be given access by agreement to parking garages in the area of the project, how will this affect the ability of civic center employees to park who park in these lots now? | V1, p. 257 |

# *Los Angeles Unified School District*
## Facilities Services Division

**ROY ROMER**
*Superintendent of Schools*

**JOSEPH A. MEHULA**
*Chief Executive, Facilities Services Division*

**JIM COWELL**
*Deputy Chief Executive, New Construction Branch*

**RENA S. PEREZ**
*Director, Master Planning and Demographics*

July 25, 2006

TO: Martha Welborne
Los Angeles Grand Avenue Authority c/o California Community Foundation
445 South Figueroa St. Suite 3400
Los Angeles, CA 90071

FROM: Rena Perez, Director
Master Planning & Demographics

SUBJECT: *Response to: Draft Environmental Impact Report for The Grand Avenue Project*

This is a response to information included within the Draft Environmental Impact Report (DEIR), as presented in the Los Angeles Grand Avenue Authority, State Clearinghouse No 2005091041 document, issued June 2006.

Select information regarding enrollments and capacities as published in the DEIR are not consistent with information officially available and provided by the LAUSD. Please see below for corrections.

1) Page 654 paragraph 1 & 2
Citing the 2004-2005 Fingertip Facts, the DEIR states " The LAUSD is currently....operates 819 K-12 schools and centers including 419 elementary schools, 74 middle schools, and 50 senior high schools..."

---

- As stated in the 2004 -2005 Fingertip Facts fact sheet, the LAUSD operates 434 elementary schools, 78 middle schools, 56 senior high schools.
- As stated in the 2005 -2006 Fingertip Facts fact sheet, the LAUSD operates 431 elementary schools , 73 middle schools, and 53 senior high schools.

2) Page 654 paragraph 3;
The DEIR states "Eligible enrollment may be less than actual enrollment as the following options could allow students to enroll in schools away from their home attendance area."

---

-As stated in the cover letter sent along with every request for information, the data provided in all LAUSD Enrollment and Capacity Reports *already take into account* portable classrooms on site, additions being built onto existing schools, **student permits and transfers**, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools.
-**"Eligible"/"Resident" enrollments may be less than Actual Enrollments mainly due to the implementation of multi-track calendars.** Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities. A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).
-**Projected Capacity**, as reported in the Enrollments and Capacities Report, identifies the capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.


KPMG Building: 355 S. Grand Ave., Suite 1020, Los Angeles, CA 90071 • Mailing Address: P.O. Box 513307-1307, Los Angeles, CA 90051-1307 •Telephone (213)633-7606 •Fax (213)633-7667

3) Page 655, paragraph 1
The DEIR states "According to the LAUSD, a school is considered to be overcrowded if any of the following conditions exist: ..."

---

-*Current* shortage/ overage of seats is defined **separately** from *future* shortages/ overages, as specified in all LAUSD Enrollments and Capacities Reports.
-A school is considered to be **currently** overcrowded if any of the following conditions is met:

a) School is **currently** on a multi-track calendar
b) There is **currently** a seating shortage
c) There is **currently** a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

-For **future** planning purposes a school will be considered to be overcrowded if any of the following conditions is met:

a) School remains on a multi-track calendar
b) There is a seating shortage in the future
c) There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

4) Page 656, paragraph 1
The project development area is served by three elementary schools.
Please refer to the three attached LAUSD Enrollments and Capacities Reports for identification and details of schools serving the Grand Avenue Project development area.
- Schools include:

a) 9th Street Elementary
b) Castelar Elementary
c) Gratts Elementary
d) Virgil Middle
e) Belmont Senior High

5) Page 656, paragraph 2
The DEIR states " However, if the actual number of students enrolled at these schools were compared to the current capacity, both schools would be operating with available capacity."

---

-The DEIR **incorrectly concludes** that Virgil Middle School and Belmont Senior High School "...would operate with available capacity" if the difference between Actual Enrollments and Current Capacities were calculated.
-Differences between Actual Enrollments and Current Capacities **cannot** be compared directly.
As stated in the LAUSD Enrollments and Capacities Report, the difference between *Resident* Enrollment and Current Capacity should be used to indicate shortage or overage of seats.
-In the cases of Virgil Middle and Belmont Senior High schools, Actual Enrollment totals reflect that LAUSD is currently enrolling students in other schools as a remedial measure for overcrowded conditions at the neighborhood school.

Additional information can be found in LAUSD's 2006 "Strategic Execution Plan" at www.laschools.org/sep/, on LAUSD's Facilities main webpage at www.laschools.org/, or on LAUSD's general website, at www.lausd.net.

ATTACHMENTS

1. UPDATED LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES REPORTS

Sincerely,

Rena Perez, Director


KPMG Building: 355 S. Grand Ave., Suite 1020, Los Angeles, CA 90071 • Mailing Address: P.O. Box 513307-1307, Los Angeles, CA 90051-1307 •Telephone (213)633-7606 •Fax (213)633-7667

## LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES

## PROJECT SERVED: THE GRAND AVENUE PROJECT - PARCEL Q, CITY OF LOS ANGELES

## SCHOOL YEAR: 2006-2007

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Location Code | School Name | Current Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current seating overage/(shortage) | Overcrowded Now? | Projected Capacity | Projected Enrollment | Projected seating overage/(shortage) | Overcrowding Projected in Future? |
| 2863 | CASTELAR EL | 1 TRK | 907 | 812 | 793 | 95 | No | 687 | 819 | (132) | Yes |
| 2385 | GRATTS EL | 3 TRK | 1051 | 966 | 921 | 85 | Yes | 627 | 812 | (185) | Yes |
| 8462 | VIRGIL MS | 3 TRK | 2819 | 4661 | 2806 | (1842) | Yes | 1950 | 4207 | (2257) | Yes |
| 8543 | BELMONT SH | 3 TRK | 4915 | 7083 | 4941 | (2168) | Yes | 2839 | 7953 | (5114) | Yes |

**Schools Planned to Relieve Known Overcrowding**

| | | 13 |
|---|---|---|
| Gratts New PC | 1-TRK | 400 |
| Central LA New MS # 1 | 1-TRK | 1701 |
| Central LA New MS # 3 | 1-TRK | 810 |
| Central LA New Learning Center # 1 | 1-TRK | 3439 |
| Central Region Belmont SPAN Reconfiguration | 1-TRK | 1971 |
| Central LA HS # 9 | 1-TRK | 1728 |
| Central LA HS #10 | 1-TRK | 1944 |
| Central LA HS #11 | 1-TRK | 2835 |
| Central LA HS #12 | 1-TRK | 513 |

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED. DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

NOTES:

[1] School's ID code

[2] School's name

[3] The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.

[4] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.

[5] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
- -Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
- -A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).

[6] The number of students actually attending the school now, including secondary-grades magnet students.

[7] Current seating overage or (shortage); equal to (current capacity) - (resident enrollment).

[8] Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
- -School is currently on a multi-track calendar
- -There is currently a seating shortage
- -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

[9] The capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

[10] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

[11] Projected seating overage or (shortage); equal to (projected capacity) - (projected enrollment).

[12] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
- -School remains on a multi-track calendar.
- -There is a seating shortage in the future.
- -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

[13] The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

# LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES

## PROJECT SERVED: THE GRAND AVENUE PROJECT - PARCELS L/M-2, CITY OF LOS ANGELES

## SCHOOL YEAR: 2006-2007

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Location Code | School Name | Current Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current seating overage/(shortage) | Overcrowded Now? | Projected Capacity | Projected Enrollment | Projected seating overage/(shortage) | Overcrowding Projected in Future? |
| 2863 | CASTELAR EL | 1 TRK | 907 | 812 | 793 | 95 | No | 687 | 819 | (132) | Yes |
| 2385 | GRATTS EL | 3 TRK | 1051 | 966 | 921 | 85 | Yes | 627 | 812 | (185) | Yes |
| 8462 | VIRGIL MS | 3 TRK | 2819 | 4661 | 2806 | (1842) | Yes | 1950 | 4207 | (2257) | Yes |
| 8543 | BELMONT SH | 3 TRK | 4915 | 7083 | 4941 | (2168) | Yes | 2839 | 7953 | (5114) | Yes |

**Schools Planned to Relieve Known Overcrowding**

| | | | 13 |
|---|---|---|---|
| | Gratts New PC | 1-TRK | 400 |
| | Central LA New MS # 1 | 1-TRK | 1701 |
| | Central LA New MS # 3 | 1-TRK | 810 |
| | Central LA New Learning Center # 1 | 1-TRK | 3439 |
| | Central Region Belmont SPAN Reconfiguration | 1-TRK | 1971 |
| | Central LA HS # 9 | 1-TRK | 1728 |
| | Central LA HS #10 | 1-TRK | 1944 |
| | Central LA HS #11 | 1-TRK | 2835 |
| | Central LA HS #12 | 1-TRK | 513 |

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED. DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

NOTES:

[1] School's ID code

[2] School's name

[3] The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.

[4] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.

[5] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
- -Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
- -A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).

[6] The number of students actually attending the school now, including secondary-grades magnet students.

[7] Current seating overage or (shortage); equal to (current capacity) - (resident enrollment).

[8] Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
- -School is currently on a multi-track calendar
- -There is currently a seating shortage
- -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

[9] The capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

[10] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

[11] Projected seating overage or (shortage); equal to (projected capacity) - (projected enrollment).

[12] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
- -School remains on a multi-track calendar.
- -There is a seating shortage in the future.
- -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

[13] The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

# LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES

## PROJECT SERVED: THE GRAND AVENUE PROJECT - PARCELS W-1/W-2, CITY OF LOS ANGELES

## SCHOOL YEAR: 2006-2007

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Location Code | School Name | Current Calendar | Current Capacity | Resident Enrollment | Actual Enrollment | Current seating overage/(shortage) | Overcrowded Now? | Projected Capacity | Projected Enrollment | Projected seating overage/(shortage) | Overcrowding Projected in Future? |
| 5505 | 9TH ST EL | 1 TRK | 531 | 264 | 464 | 267 | No | 438 | 327 | 111 | No |
| 8462 | VIRGIL MS* | 3 TRK | 2819 | 4661 | 2806 | (1842) | Yes | 1950 | 4207 | (2257) | Yes |
| 8543 | BELMONT SH | 3 TRK | 4915 | 7083 | 4941 | (2168) | Yes | 2839 | 7953 | (5114) | Yes |

**Schools Planned to Relieve Known Overcrowding**

| | | 13 |
|---|---|---|
| Central LA New MS # 1 | 1-TRK | 1701 |
| Central LA New MS # 3 | 1-TRK | 810 |
| Central LA New Learning Center # 1 | 1-TRK | 3439 |
| Central Region Belmont SPAN Reconfiguration | 1-TRK | 1971 |
| Central LA HS # 9 | 1-TRK | 1728 |
| Central LA HS #10 | 1-TRK | 1944 |
| Central LA HS #11 | 1-TRK | 2835 |
| Central LA HS #12 | 1-TRK | 513 |

NUMBERS REFLECT DATA COLLECTED FOR THE SCHOOL YEAR INDICATED. DATA ARE UPDATED ANNUALLY DURING THE FALL SEASON OF EACH YEAR.

NOTES:

[1] School's ID code

[2] School's name

[3] The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3-TRK or 4-TRK), because of overcrowded conditions.

[4] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.

[5] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
- -Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
- -A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1-TRK).

[6] The number of students actually attending the school now, including secondary-grades magnet students.

[7] Current seating overage or (shortage); equal to (current capacity) - (resident enrollment).

[8] Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
- -School is currently on a multi-track calendar
- -There is currently a seating shortage
- -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats

[9] The capacity the school will have after shifting to a 2-semester (1-TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

[10] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

[11] Projected seating overage or (shortage); equal to (projected capacity) - (projected enrollment).

[12] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
- -School remains on a multi-track calendar.
- -There is a seating shortage in the future.
- -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

[13] The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Business Services Division

LOC. CODE: 5505

SUBJECT: UPDATE BOUNDARY DESCRIPTION FOR NINTH STREET SCHOOL EFFECTIVE JULY 1, 1984 (UPDATED 7-1-94).

Reconfiguration has changed the grade levels serviced by this school and the boundary description has been updated to reflect this change. This updating does not change the intent of the boundary as it was approved on July 1, 1984. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES K - 5)

FIRST STREET * ALAMEDA STREET * FOURTH STREET * LOS ANGELES RIVER * FIFTEENTH STREET AND EXTENSION * CENTRAL AVENUE * FOURTEENTH PLACE * SAN PEDRO STREET * FOURTEENTH STREET AND EXTENSION * MAIN STREET * FOURTEENTH STREET * HILL STREET * VENICE BOULEVARD * HOPE STREET AND EXTENSION * FOURTH STREET * OLIVE STREET.

For assistance, please call Demographic and Boundary Unit, Facilities Asset Management Division, at (213) 742-7596.

APPROVED: C. DOUGLAS BROWN, Interim Coordinator, Facilities Asset Management Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Information Technology Division

LOC. CODE: 2385

SUBJECT: CLARIFICATION OF THE BOUNDARY DESCRIPTION FOR EVELYN T. GRATTS SCHOOL EFFECTIVE JULY 1, 1996 (CLARIFIED 7-5-96).

This clarification of the existing boundary description does not change the intent of the boundary as it was approved on July 1, 1996. (Changes have been highlighted by "strikeout" and/or boldface type.) The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES K - 5)

BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY * WILSHIRE BOULEVARD * WITMER STREET (BOTH SIDES) * SIXTH STREET * LOMA DRIVE (BOTH SIDES) * THIRD STREET (BOTH SIDES) * UNION PLACE (BOTH SIDES EXCLUDED) * CROWN HILL AVENUE (BOTH SIDES) * ~~SECOND STREET (BOTH SIDES)~~ * LOMA DRIVE (BOTH SIDES).

OPTIONAL: GRATTS AND CASTELAR SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
**Information Technology Division**

**LOC. CODE:2863**

**SUBJECT:** **NEW SERVICE BOUNDARY DESCRIPTION FOR CASTELAR SCHOOL EFFECTIVE JULY 1, 1996.**

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 1984 (updated July 1, 1995).

This is an official copy for your file.

(GRADES K - 5)

INNES AVENUE (BOTH SIDES EXCLUDED) * LILAC PLACE (BOTH SIDES EXCLUDED) * ELYSIAN PARK AVENUE (BOTH SIDES EXCLUDED) * STADIUM WAY * LILAC TERRACE (BOTH SIDES) * LOOKOUT DRIVE (BOTH SIDES) * STADIUM WAY (BOTH SIDES) * PASADENA FREEWAY * BERNARD STREET AND EXTENSIONS * NORTH SPRING STREET * ALAMEDA STREET * FIRST STREET * FREMONT AVENUE (BOTH SIDES EXCLUDED) * TEMPLE STREET * BEAUDRY AVENUE (BOTH SIDES) * SUNSET BOULEVARD * EVERETT STREET (BOTH SIDES EXCLUDED) * EVERETT PLACE AND EXTENSION (BOTH SIDES EXCLUDED).

OPTIONAL: CASTELAR AND GRATTS SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L.A.

LOS ANGELES UNIFIED SCHOOL DISTRICT
Business Services Division

LOC. CODE: 5505

SUBJECT: UPDATE BOUNDARY DESCRIPTION FOR NINTH STREET SCHOOL EFFECTIVE JULY 1, 1984 (UPDATED 7-1-94).

Reconfiguration has changed the grade levels serviced by this school and the boundary description has been updated to reflect this change. This updating does not change the intent of the boundary as it was approved on July 1, 1984. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES K - 5)

FIRST STREET * ALAMEDA STREET * FOURTH STREET * LOS ANGELES RIVER * FIFTEENTH STREET AND EXTENSION * CENTRAL AVENUE * FOURTEENTH PLACE * SAN PEDRO STREET * FOURTEENTH STREET AND EXTENSION * MAIN STREET * FOURTEENTH STREET * HILL STREET * VENICE BOULEVARD * HOPE STREET AND EXTENSION * FOURTH STREET * OLIVE STREET.

For assistance, please call Demographic and Boundary Unit, Facilities Asset Management Division, at (213) 742-7596.

APPROVED: C. DOUGLAS BROWN, Interim Coordinator, Facilities Asset Management Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
Information Technology Division

**LOC. CODE: 2385**

**SUBJECT:** CLARIFICATION OF THE BOUNDARY DESCRIPTION FOR EVELYN T. GRATTS SCHOOL EFFECTIVE JULY 1, 1996 (CLARIFIED 7-5-96).

This clarification of the existing boundary description does not change the intent of the boundary as it was approved on July 1, 1996. (Changes have been highlighted by "strikeout" and/or boldface type.) The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES K - 5)

BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY * WILSHIRE BOULEVARD * WITMER STREET (BOTH SIDES) * SIXTH STREET * LOMA DRIVE (BOTH SIDES) * THIRD STREET (BOTH SIDES) * UNION PLACE (BOTH SIDES EXCLUDED) * CROWN HILL AVENUE (BOTH SIDES) * ~~SECOND STREET (BOTH SIDES)~~ * LOMA DRIVE (BOTH SIDES).

OPTIONAL: GRATTS AND CASTELAR SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

**APPROVED:** JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

**DISTRIBUTION:**
School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
**Information Technology Division**

**LOC. CODE:2863**

**SUBJECT: NEW SERVICE BOUNDARY DESCRIPTION FOR CASTELAR SCHOOL EFFECTIVE JULY 1, 1996.**

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 1984 (updated July 1, 1995).

This is an official copy for your file.

(GRADES K - 5)

INNES AVENUE (BOTH SIDES EXCLUDED) * LILAC PLACE (BOTH SIDES EXCLUDED) * ELYSIAN PARK AVENUE (BOTH SIDES EXCLUDED) * STADIUM WAY * LILAC TERRACE (BOTH SIDES) * LOOKOUT DRIVE (BOTH SIDES) * STADIUM WAY (BOTH SIDES) * PASADENA FREEWAY * BERNARD STREET AND EXTENSIONS * NORTH SPRING STREET * ALAMEDA STREET * FIRST STREET * FREMONT AVENUE (BOTH SIDES EXCLUDED) * TEMPLE STREET * BEAUDRY AVENUE (BOTH SIDES) * SUNSET BOULEVARD * EVERETT STREET (BOTH SIDES EXCLUDED) * EVERETT PLACE AND EXTENSION (BOTH SIDES EXCLUDED).

OPTIONAL: CASTELAR AND GRATTS SCHOOLS

FIRST STREET * OLIVE STREET * FOURTH STREET * HOPE STREET AND EXTENSION * SEVENTH STREET * HARBOR FREEWAY.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L.A.

**LOS ANGELES UNIFIED SCHOOL DISTRICT**
Facilities Services Division

**LOC. CODE:** 8462

**SUBJECT:** NEW SERVICE BOUNDARY DESCRIPTION FOR VIRGIL MIDDLE SCHOOL EFFECTIVE JULY 1, 2001

The area described below has been approved by the superintendent as the attendance area served by the above mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1 1996 (updated 7-1-97).

This is an official copy for your file.

(GRADES 6-8)

MELROSE AVENUE * NORMANDIE AVENUE * MONROE STREET AND EXTENSION (INCLUDING 826 MARIPOSA AVENUE AND 773 ALEXANDRIA AVENUE) * ALEXANDRIA AVENUE * MONROE STREET * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * SILVER LAKE BOULEVARD * BELLEVUE AVENUE * MICHELTORENA STREET * MARATHON STREET * RAMPART BOULEVARD * SUNSET BOULEVARD * ALVARADO STREET * MONTROSE STREET * GLENDALE BOULEVARD * TEMPLE STREET * BELMONT AVENUE * BEVERLY BOULEVARD * SECOND STREET * HARBOR FREEWAY * THIRD STREET * LUCAS AVENUE * SIXTH STREET * LAFAYETTE PARK PLACE * WILSHIRE BOULEVARD * WESTERN AVENUE.

For assistance, please call Master Planning and Demographics Branch, Facilities Services Division, at (213) 633-7606.

**APPROVED:** JAMES A McCONNELL, Chief Facilities Executive, Facilities Services Division

**DISTRIBUTION:**
School
Pupil Statistics
Transportation Branch
Master Planning and Demographics
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

Facilities Services Division

**LOC. CODE:** 8543

**SUBJECT:** NEW SERVICE BOUNDARY DESCRIPTION FOR BELMONT SENIOR HIGH SCHOOL EFFECTIVE JULY 1, 2005.

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective July 1, 2004.

This is an official copy for your file.

(GRADES 9 – 11)

MELROSE AVENUE * NORMANDIE AVENUE * HOLLYWOOD FREEWAY * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * ALVARADO STREET AND EXTENSION * WHITMORE AVENUE AND EXTENSION * LANDA STREET (BOTH SIDES, INCLUDING ALL OF TWIN OAK STREET) * LANDA STREET EXTENDED FROM THE INTERSECTION OF LANDA STREET AND STADIUM WAY * GOLDEN STATE FREEWAY * WEST BOUNDARY OF ELYSIAN PARK * ACADEMY ROAD AND EXTENSION EASTERLY AND SOUTHERLY TO THE INTERSECTION OF STADIUM WAY AND PASADENA FREEWAY * STADIUM WAY AND EXTENSION * NORTH SPRING STREET * ALAMEDA STREET * SANTA ANA FREEWAY * LOS ANGELES RIVER * WHITTIER BOULEVARD * SIXTH STREET * MAIN STREET * PICO BOULEVARD * HARBOR FREEWAY * VENICE BOULEVARD * UNION AVENUE * 14TH STREET * BURLINGTON AVENUE * PICO BOULEVARD * MAGNOLIA AVENUE * 12TH STREET * WESTMORELAND AVENUE * ELEVENTH STREET * VERMONT AVENUE * WILSHIRE BOULEVARD * KINGSLEY DRIVE * BEVERLY BOULEVARD * KINGSLEY DRIVE.

(GRADE 12)

MELROSE AVENUE * NORMANDIE AVENUE * HOLLYWOOD FREEWAY * VERMONT AVENUE * BEVERLY BOULEVARD * TEMPLE STREET * ALVARADO STREET AND EXTENSION * WHITMORE AVENUE AND EXTENSION * LANDA STREET (BOTH SIDES, INCLUDING ALL OF TWIN OAK STREET) * LANDA STREET EXTENDED FROM THE INTERSECTION OF LANDA STREET AND STADIUM WAY * GOLDEN STATE FREEWAY * WEST BOUNDARY OF ELYSIAN PARK * ACADEMY ROAD AND EXTENSION EASTERLY AND SOUTHERLY TO THE INTERSECTION OF STADIUM WAY AND PASADENA FREEWAY * STADIUM WAY AND EXTENSION * NORTH SPRING STREET * ALAMEDA STREET * SANTA ANA FREEWAY * LOS ANGELES RIVER * WHITTIER BOULEVARD * SIXTH STREET * MAIN STREET * WASHINGTON BOULEVARD * HARBOR FREEWAY * VENICE BOULEVARD * UNION AVENUE * 14TH STREET * BURLINGTON AVENUE * PICO BOULEVARD * MAGNOLIA AVENUE * 12TH STREET * WESTMORELAND AVENUE * ELEVENTH STREET * VERMONT AVENUE * WILSHIRE BOULEVARD * KINGSLEY DRIVE * BEVERLY BOULEVARD * KINGSLEY DRIVE.

For assistance, please call Master Planning and Demographics, Facilities Services Division, at (213) 633-7606.

**APPROVED:** JAMES A. McCONNELL, JR., Chief Facilities Executive, Facilities Services Division

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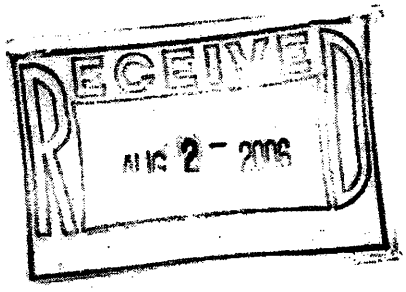


August 1, 2006

Martha Welborne, Managing Director
Grand Avenue Committee
c/o California Community Foundation
445 South Figueroa, #3400
Los Angeles, CA 90071

Dear Martha,

On review of the draft EIR summary for the planned Grand Avenue Project, I have two main concerns which I would like to share with you: parking and noise.

- As you know, parking is a particular problem in this part of downtown, and the site bounded by 1st and 2nd Streets, Grand and Olive is presently dedicated to substantial parking which will of course be lost to use. The parcels west of Grand Avenue and south of Walt Disney Concert Hall – now dedicated to parking – will also eventually be developed as part of this plan. Page seven of the summary refers to "... public parking at a reasonable rate that will attract the public ...", yet I see no mention of any replacement of this parking which might contribute to the quoted statement.

  I do not believe that downtown parking is the responsibility of the Grand Avenue Project; however, there seems to be a disconnect in the EIR and I do envision this project worsening an already difficult situation.

  We are also concerned about parking for the estimated 250 to 600 construction workers. If this is not remote parking, it will clearly further exacerbate an already overtaxed parking situation in the local area.

- Regarding the noise issue, with an allowable construction schedule of Monday through Friday 7:00am–8:00pm and Saturday 8:00am–6:00pm, we may have a significant problem especially in the portions of our campus facing north (1st Street). Although our facilities have STC ratings of 35 to as high as 44, I am nonetheless concerned that, given the nature of what we do here, this may be significantly insufficient, most especially during our peak hours of 4:00 and later in music teaching studios, and at most construction hours in our library and performance lab, during periods of heavy construction work.

We are very supportive of the Grand Avenue Project, and we fully understand that urban construction adjacent to our facility will cause some inconvenience, just as our construction has inconvenienced our neighbors. Nonetheless, our concerns – particularly regarding noise – are real.

I hope that these concerns will be reviewed and addressed in some manner. Assuming that there is some form of communication group formed to deal with problems related to the project(s), we ask that a representative of the Colburn School be included.

Sincerely,

Joseph Thayer
Executive Director

JT:im

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August 3, 2006

Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa St., Suite 3400
Los Angeles, CA 90071
HAND-DELIVERED

**Re: Grand Avenue Project; Comments to Draft Environmental Impact Report, State Clearinghouse No. 2005091041**

Dear Ms. Welborne:

Thank you for the opportunity to provide the following written comments in response to the Draft Environmental Impact Report (DEIR) for the Grand Avenue Project (the "Project"). The Legal Aid Foundation of Los Angeles (LAFLA) submits these comments on behalf of the Grand Avenue Coalition for Community Benefits (the "Coalition"). The Coalition includes: Strategic Actions for a Just Economy (SAJE); Coalition LA; Esperanza Community Housing Corporation; the Los Angeles Community Action Network (LACAN); the Community Development Technologies Center; Los Angeles Metropolitan Churches; Concerned Citizens of South Central Los Angeles and Painters and Allied Trades District Counsel #36. Together, these organizations represent thousands of low-income and working class people who live and work in and around downtown Los Angeles and who will be impacted by the Project. Our shared purpose is to ensure *equitable development* in and around the core of Los Angeles; that is, development that benefits all who live and work there, including poor and working people.

The Project is uniquely situated in the downtown area and between stark representations of the extreme poles of Los Angeles. It is walking distance from magnificent new assets including Disney Hall and the new Cathedral. It is also walking distance from Skid Row, where the nation's largest homeless population resides near

other low-income people living in residential hotels. Because of its location and magnitude, the Project holds tremendous potential to benefit the local community; however, there is also a great risk of serious adverse impacts to local residents and the environment.

As the DEIR evidences, the Project is one of the most significant developments to be proposed for downtown in recent history. Its footprint and impacts will be felt throughout the City for years to come. It is also a significantly public project. It has been overseen by a unique joint powers authority, it involves numerous public agreements and contracts, and, at a time of diminishing public resources, it requires significant financial investments by both the City and the County. A project of such environmental, economic, and political significance truly needs to do more. It needs to:

**1. Fix What's Broken:** The Project needs to contribute commensurately to fixing the widening divide between rich and poor in this City. This divide, now the broadest in the country, is the single most environmental threat to the success of downtown Los Angeles, as pointed out by New York officials, as well as to the City as a whole.

**2. Do No Harm:** The Project must not contribute to increasing this widening divide. It must not exacerbate the City's energy, traffic, transportation, and air quality problems. It must not increase an imbalance between jobs and housing. As it currently stands, and as pointed out by this review, the Project does all of these things. It does not include an energy analysis; it asserts that traffic and transportation and air quality issues presented by the Project are not completely mitigatible, and there is no meaningful presentation of how a balanced view of the Project's jobs and housing can precisely serve this end.

**3. Do Good:** The significance of the Project as a public collaboration and investment requires more than minimal mitigation. It needs to model the values of what kind of City we want Los Angeles to be. In our mind, this is one of increased equity of opportunity, where people of all classes can live in proximity, where low-income people can rise up through better jobs and housing, and where all of our children will be able to afford to live.

It is this context that frames our perspective on the DEIR. It is always the case that the goal of CEQA is to prevent and mitigate negative environmental impacts. And, according to this standard, we find the DEIR to be lacking, as described in detail below. Thus our comments on the DEIR may be summarized as follows:

1. **A stronger nexus needs to be built between transportation, housing, and jobs at a level of detail that will produce meaningful results. The Project is uniquely situated for this to be possible.**

2. **Far greater attention must be paid to the adverse impact of the Project on the health, social and economic conditions of the existing residents of downtown, many of whom are homeless.**

3. **A stronger relationship needs to be built between the benefits that may be derived from the Project and the underserved, underhoused, and underemployed residents of Skid Row and South Central Los Angeles.**

4. **These efforts, taken to a refined level of specificity and implemented in a meaningful way, will serve to mitigate the Project's adverse environmental impacts.**

With this in mind, LAFLA submits the following comments on behalf of the Coalition. The Coalition affirms its intention and commitment to work with the Los Angeles Grand Avenue Authority (the "Authority"), the City of Los Angeles, and other interested parties, to develop a consensus proposal that addresses our concerns through a comprehensive community benefits program. The Coalition looks forward to a constructive dialogue and negotiation process that will balance the needs of Project with the interests of neighboring communities in a healthier environment and better economic opportunities. As we explain further below, this community benefits program would mitigate the Project's adverse environmental impacts.

## GENERAL COMMENTS

The DEIR suffers from a number of flaws, many of which can be traced to (1) a failure to adequately consider the Project's impact on existing residents and (2) a series of incorrect assumptions about transportation, housing and jobs and the relationship between these elements.

Considerable time and effort has been put into the DEIR, and for this we commend the Authority and other participants in this process. However, as set forth below, major adjustments and expansion are necessary in order to arrive at a legally adequate and appropriate EIR. Determinations made by lead agencies in an EIR must be supported by substantial evidence. Cal. Pub. Res. Code §§ 21168, 21168.5; 14 Cal. Code Regs §§ 15091, 15384 (CEQA Guidelines). Here, the DEIR fails to provide substantial evidence for certain key factual assumptions. These omissions, in addition to our other concerns, are addressed in detail below.

## AFFECTED ENVIRONMENT, CONSEQUENCES, AND MITIGATION MEASURES

### A. Energy

#### 1. The EIR Is Legally Required to Include an Analysis of Energy Impacts

Appendix F of the CEQA Guidelines states, "[i]n order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and

unnecessary consumption of energy." Appendix F further provides a long and detailed list of energy impact possibilities and potential conservation measures designed to assist in the preparation of an EIR.

Further, CEQA requires the Authority to identify all possible significant adverse environmental impacts of the Project. (Calif. Pub. Res. Code §21100(b)(1); Guidelines §15126.2.) California courts have recognized energy consumption as having a significant adverse environmental impact for CEQA purposes. *See, e.g., County Sanitation Dist. No. 2 v. County of Kern*, (2005) 127 Cal. App. 4th 1544, 1590 ("a fair argument can be made that the increased energy use caused by further treatment processes would cause a significant effect on the environment"); *City of Redlands v. County of San Bernardino*, (2002) 96 Cal. App. 4th 398, 412-14 (upholding trial court order to prepare EIR based in part on potential for increased energy consumption).

Accordingly, the Project EIR will be legally insufficient if it does not contain an analysis of energy impacts.

**2. The Project Is Likely to Have a Significant Energy Impact**

During the month of July, 2006, the state of California broke the all time record for energy use. (Patricia Jiayi Ho, "HOT HAND: ISO weathers the crisis," Pasadena Star News, July 25, 2006). On July 24, 2006, the California Independent Systems Operator (California ISO) issued a Stage Two Emergency, meaning that the state's operating reserves of power were at less than five percent. On that date, the California ISO warned of a possible Stage Three Emergency and rotating blackouts. (California ISO, News Release, July 24, 2006, "CALIFORNIA ISO DECLARES STAGE TWO EMERGENCY").

The Project is a "24-hour development" (DEIR p.7) consisting of 449,000 square feet of retail space, a 275 room hotel, 2,020 residential units and either 681,000 square feet of County office space or 600 additional residential units (DEIR p. 10-11). The Project will generate either 2,925 or 3,777 residents and either 1,206 or 3930 employees. (DEIR p. 45). Appendix D-3 to the EIR contains estimates that the Project will use 27 million kilowatt hours per year of electricity with the Residential Option or 32.5 million kilowatt hours per year of electricity with the County Building Option. This represents a massive increase in the levels of energy consumption over those generated by the current use, which is open space and surface and subterranean parking lots. (DEIR, p. 105-110).

The building materials used to construct the Project will have a major impact on the environment in the downtown area. The Environmental Affairs Department of the City of Los Angeles has acknowledged the Urban Heat Island Effect created by building without energy efficient materials and sufficient tree coverage. There is a real human impact to the urban heat island effect. The heat island effect not only forces the use of more energy to cool indoor environments, but also renders the downtown area even more unbearably hot for those who have to live outdoors or without air conditioning.

### 3. The DEIR Fails to Include an Energy Impact Analysis

Despite the aforementioned legal requirements and the Project's obvious potential for significant energy impact, the Draft EIR contains no dedicated analysis of energy implications of the Project. The Project description does not discuss energy consumption or energy-related Project features. The environmental setting discussion fails to include existing energy supplies and energy use patterns in the region and locality. The impact analysis contains no discussion of energy use, its impact on existing supply, or compliance with existing energy standards. There is no analysis of energy-related mitigation measures, nor is there a comparison of Project alternatives in terms of energy impact. These are omissions of major significance for the adequacy of the EIR.

In the Air Quality analysis, the DEIR does include an examination of air quality impacts based on energy and natural gas consumption associated with Project occupation and operation. (DEIR p. 543, 555). Notably, the NOx emissions associated with energy and natural gas consumption alone exceed the applicable SQAMD significance threshold. (*Id.*) This discussion, however, is limited to the issue of regional air quality impact, and thus falls well short of the comprehensive energy analysis described in CEQA Guidelines Appendix F.

### 4. The EIR Should Analyze Project Compliance with State Energy Efficiency Standards and Leadership in Energy and Environmental Design (LEED) Standards

The CEQA Guidelines indicate that an EIR should analyze "the degree to which the project complies with existing energy standards." CEQA Guidelines Appendix F § II.C.(4).

The Draft EIR indicates that the Project will employ plans and specifications to ensure that all Project buildings meet California Title 24 Energy Efficiency standards for water heating, space heating and cooling. (Regulatory Measure F-2, DEIR p. 565). However, the Project must meet *all* Title 24 Energy Efficiency Standards in order to receive a building permit. The Standards cover, among other things, building envelope, indoor lighting, outdoor lighting and signage, with different standards specific to various elements of the Project such as high-rise residential, hotel/motel, etc. The DEIR contains no explicit analysis of the Project's compliance with the Title 24 Energy Efficiency standards. This is a significant omission which should be corrected.

The EIR should also analyze the Project's compliance with the Leadership in Energy and Environmental Design (LEED) system developed by the U.S. Green Building Council. The LEED guidelines encourage use of non-toxic materials, renewable energy and water efficiency. Just some of the vital LEED categories not covered by the DEIR are: renewable energy, green power and building materials.

If a building or project meets certain specific criteria under the LEED guidelines, the building or project can seek certification under the program. We encourage the Authority to seek the platinum certification under the LEED guidelines, utilizing the cleanest and most energy efficient building standards. According to the U.S. Green Building Council, such LEED buildings can be built within a mere 2-3% cost increase, and often the energy savings pay back that extra cost in short order.

The City of Los Angeles has a LEED Ordinance that requires a LEED "Certified" Level for all Department of Public Works new design and construction building projects 7,500 square feet or larger. Moreover, legislation pending before the Los Angeles City Council calls for the study of a policy under which the City would only lease facilities that are equipped with energy and water efficiency systems or meet Leadership in Energy and Environmental Design (LEED) standards. The Project, which sits on land leased from the City and County of Los Angeles, should move in the direction of City policy and pursue LEED certification.

### B. Traffic Impacts

The DEIR identifies a number of significant traffic impacts from the Project. These impacts would exacerbate already low services levels at a number of key intersections in and around the Project site. Putting aside mitigation measures for the moment, the Project anticipates significant traffic impacts on seven intersections in the A.M. peak hour (DEIR, p. 265.) and seventeen in the P.M. peak hour. (DEIR, p. 270). These include nearly all of the major intersections in and around the Project area. In all but two of these intersections, the resultant Level of Service would be rated at D (fair), E (poor), or F (gridlocked). Even with the proposed mitigation measures in place, the DEIR concludes that the Project will result in significant continuing traffic impacts. Specifically, during operation (after construction) the Project would cause one significant impact on intersection service levels in the morning peak hour and 13 significant impacts in the evening peak hour. (DEIR, p. 322).

#### 1. The DEIR's Analysis of Construction Worker Traffic Is Inadequate

Construction of the Project is estimated to require 250 to 600 workers on site each work day. (DEIR, p. 255). The DEIR states, "[i]n general, the majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding travel during the A.M. and P.M. peak traffic periods." (DEIR, p. 312; see also 255, Appendix B, 106). This statement is the sole basis provided in the DEIR for the conclusion that the impact and cumulative impact of construction worker traffic are not significant. No explanation is given for the reported expectation that workers will arrive early and leave early. No analysis is provided for the contingency that construction worker trips do occur during peak hours. More importantly, ignorance of

potential significant effects here prevents consideration of adequate mitigation measures. The DEIR does not meet CEQA requirements on this point.

### 2. The DEIR Relies on Questionable Assumptions Regarding Reduced Trip Generation

These estimates already take into account substantial reductions in estimated trip generation from that which would be expected based on the Institute for Transportation Engineers (ITE) *Trip Generation* source book. These reductions are based on the Project's characteristics as an urban, transit-oriented project and by consideration of rates of pedestrian, bicycle and transit use for other parts of downtown Los Angeles. The adjustments reduce residential trips by 29 percent, hotel trips by 34 percent, office trips by 45 percent, retail trips by 55 percent, restaurant trips by 50 percent, event facility trips by 23 percent, and health club trips by 62 percent.

There may be substantial reasons to believe that the anticipated reductions will not in fact be realized. The DEIR assumes that residents of the new development will own cars at a lower rate than other Los Angeles residents. (DEIR, p. 293.) The DEIR speculates: "[t]he Project will attract homeowners who are looking for an urban lifestyle—one where people can walk or use transit to get to many destinations, and thus have less of a need for a car." (DEIR. p. 293.) Speculation can be countered by speculation: residents and users of the new and upscale development will come from middle and upper income brackets and will be more likely to use cars rather than public transportation. This is evidenced by the fact that the vast majority of public transit users are low-income; a full sixty-eight percent of those taking transit in Los Angeles have incomes under $15,000. (Douglas P. Shuit, "Restless Riders," L.A. Times, Sept. 7, 2000, 1.) The DEIR's assumption about use of cars inevitably compromises analysis of traffic and parking impacts. "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate . . . does not constitute substantial evidence." CEQA Guidelines, §15384(a). Thus, the current DEIR analysis of associated traffic and parking impacts is inadequate. Effective mitigation analysis needs to be informed by accurate impacts analysis.

### 3. The Project's Design Does Not Encourage Non-Automobile Travel

The Project's design does not conform to the kind of urban development patterns that typically give rise to high rates of non-automobile travel. Those kinds of development typically have narrow streets with short blocks and all storefronts and buildings abutting the sidewalk, a plethora of diverse, small and medium businesses, a predominantly low- to middle-income demographic profile, a lack of off-street parking, etcetera. The Project, as envisioned, does not anticipate any of the above-noted factors. The fact that the Project is located *in* downtown does not in and of itself guarantee that people will not use automobiles to access it. There are no metrics or evidence offered to support these anticipated reductions in projected automobile trips by users of the Project.

**C. Population, Housing, and Employment**

The Project's County Office Building Option is forecasted to generate 2,925 residents and 3,930 employees, while the Additional Residential Development Option is estimated to generate a residential population of 3,777 and 1,206 employees. The increase in population growth within the Central City Community Plan (Plan) area attributable to the Project is greater than projected under the original Plan. Because this growth would allegedly support policies to reduce the jobs/housing ratio per the DEIR, population and housing impacts are concluded to be less than significant.

However, because both options create larger than projected growth, the jobs/housing ratio may actually be increased. Specifically, under the County Office Building Option, the jobs/housing ratio is increased to 1.3/1. In addition, under both options the cumulative impacts greatly increase the jobs/housing ratio (61,158 employees to 28,952 residents, and 65,364 employees to 31,877 residents). Thus, the cumulative impacts of the Project on the jobs/housing ratio are significant, so that the *DEIR incorrectly states that the jobs/housing ratio is reduced, and incorrectly asserts that growth is insignificant.* Therefore, the population and housing section should be revised to include appropriate mitigation measures and level of significance.

The Housing Element of the City's General Plan states that 47% of all new housing in the City should be affordable. This standard will never be achieved unless major projects like Grand Avenue make significant contributions to the affordable housing stock. In addition, as we discuss in the Mitigation Measures section below, local hiring and affordable housing are key to resolving unmitigated traffic, transportation and air quality issues presented by the Project.

**D. Air Quality Impacts**

Despite a number of mitigation measures put forward in the DEIR, the air quality impacts related to construction and permanent operations remain significant and allegedly unavoidable. We believe that there is much more that could be done to mitigate the air quality impacts of the Project.

Emissions from Project operations are divided into three main categories: (1) indirect sources; (2) area sources; and (3) stationary sources. Indirect sources are defined as building, facilities, structures, or properties that attract or generate mobile source activity (autos and trucks). This includes retail uses, employment sites, housing development, etc. Area sources are sources that individually emit small quantities or air pollutants, but which cumulatively may represent significant quantities of emissions. Water heaters, lawn maintenance equipment, and the application of paints and lacquers during maintenance activities are examples of area sources emissions. Stationary, or point, sources are equipment or devices operating at commercial facilities that directly emit air pollutants.

As articulated in the DEIR, unmitigated significant air impacts will also result from Project construction activities. First and foremost is the danger presented by heavy-duty diesel non-road vehicles used in construction. Backhoes, bulldozers, excavation machines, dump trucks, cranes, diesel generators and all-terrain vehicles all present a special threat to air quality.

Nationally, non-road diesel engines emit more fine particles than all the nation's passenger cars and trucks, heavy-duty on-road diesels and electric utilities *combined.* Diesel particles pose the single greatest source of cancer risk from air pollution. Public health organizations, including the National Institute for Occupational Safety and Health, the World Health Organization, the U.S. Environmental Protection Agency (EPA), the California EPA and the Department of Health and Human Service's National Toxicology Program, have associated diesel exhaust or diesel particulates with increased risk of cancer. Epidemiological studies show increased lung cancer risks ranging from 20% to 89%.

In addition, the fine particles from diesel that are breathed deep into the lungs are responsible for thousands of premature deaths from other causes every year. There is a well-researched body of epidemiological studies from around the world that documents the serious effects associated with exposure to particulates. These studies report an association between particulate air pollution and reductions in lung function, respiratory symptoms, school absenteeism, increased use of asthma medications, doctor visits, emergency room visits, hospital admissions and premature death.

During the construction phase, localized PM10 and NO2 impacts would be significant (DEIR, p. 540-541.) Moreover, with respect to operations, "the Proposed Project would exceed regional SCAQMD thresholds for VOC, CO, NOx and PM10 and impacts associated with these criteria pollutants would be significant" (DEIR, p. 542-3.)

Given the already poor state of air quality in the downtown Los Angeles area, the outcomes described above are unacceptable and further mitigation measures should be analyzed, as described below. Additionally, the DEIR's analysis of air quality impacts on existing downtown residents is inadequate. The more than 8,000 homeless residents of downtown, who are outside a great majority of the time will bear the brunt of the Project's negative impact on air quality. The DEIR should specifically analyze the Project's impact on these sensitive receptors.

**E. Public Services**

**1. Fire Services, Police Services and Other Emergency Services**

The DEIR states that Project construction may result in temporary lane closures that would potentially affect emergency access; and that construction activities may temporarily increase the demand on fire services due to the presence of combustible

materials. Emergency access is crucial to the downtown community, especially because there is a disproportionately high number of elderly residents and residents with disabilities. Any delay in emergency services to these groups could mean life or death for these residents; thus, any impact that delays access to emergency services is significant.

Downtown residents currently face high waiting times for emergency services, especially police assistance. Currently, response times for LAPD's Central Area Division are under par. This Project will increase the ratio of crimes per officer from 20 to 23.4. (DEIR, p. 647.) In addition, according to the DEIR, the cumulative impact will be to increase crimes per officer from 20 to 59, approximately three times greater than the 19 crimes that are currently handled by each officer Citywide. (DEIR, p. 648.) The DEIR states that if additional officers are not added to the force, the increased demand will "constitute a substantial exceedance [sic] of LAPD's capacity to provide services. Thus, cumulative impacts with regard to police protection services would be significant." Id. The DEIR then states that if the City "added resources" in response to the growth, the cumulative impacts would be less significant. Id. However, because it is uncertain whether the City will be able to contribute more resources in this area, and what the scope of the resources would be, the cumulative impacts as they are laid out are significant.

Additionally, the DEIR states that increased activity within the five development parcels and the Civic Park would likely result in increased demand for police services. This problem is partially addressed by suggestion that private security personnel will be utilized in the park. Under this scenario, the DEIR states that the demand for services provided by the LAPD is not anticipated to increase. However, it is unclear whether private security will decrease demand for LAPD services. There is no proposal regarding the provision of the security guards or their ability to respond to crises currently faced by public entities like the LAPD. Also, the use of private security in the park may significantly limit access to the park by all Downtown residents, including low-income and homeless residents.

The DEIR asserts that none of these changes would constitute a significant impact. However, this claim is based on a scenario where the City *added resources* in response to growth, and/or *if* private resources for security were included in the plan. Because of the currently insufficient response times of public entities, the uncertainty of the City's ability to contribute more resources to this area, and the uncertainty of the availability or effectiveness of private security personnel, these changes will have an adverse impact on residents, and thus are significant impacts.

**2. Parks and Recreation**

Under the Quimby Act, development entities must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. Cal. Gov't. Code §66477. The fees must be paid and land conveyed directly to the local public agencies that provide park and recreation services community-wide. The Act requires the provision of three acres of park area per 1,000 persons

residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the City may adopt a higher standard not to exceed five acres per 1,000 residents. *Id.* Additionally, there are acreage and population standards and formulas for determining the exaction, and agencies must clearly show a strong direct relationship or nexus between the park fee exactions and the proposed project. Local ordinances must now include definite standards for determining the proportion of the subdivision to be dedicated and the amount of the fee to be paid. *Id.*

The Quimby standards of three acres per 1,000 persons will not be achieved on this site. If the in-lieu fee is chosen as the mitigation measure, the in-lieu fee should be used to create park space based on the most park-poor communities in Los Angeles. Additionally, the park space should be guaranteed to meet the park needs of all Downtown residents and specific mitigation measures should be listed to ensure inclusive access to the park.

### F. Mitigation Measures

#### 1. General Comments

Under CEQA, for each identified significant adverse environmental impact, an EIR must identify specific mitigation measures. CEQA Guidelines § 15126.4. According to the California Supreme Court, analysis of alternatives and mitigation measures is "the core" of an EIR. *Citizens of Goleta Valley v. Board of Supervisors*, (1990) 52 Cal. 3d 553, 564. "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified." CEQA Guidelines § 15126.4(a)(1)(B). The DEIR fails to discuss certain mitigation measures, in violation of § 15126.4(a)(1)(B). Further, DEIR findings concerning whether certain significant impacts are mitigated and to what extent impacts are mitigated are not supported by substantial evidence, in violation of §§ 21168, 21168.5 of the California Public Resources Code. *See Mira Mar Mobile Community v. City of Oceanside*, (2004) 119 Cal. App. 4th 477, 495 (opining that mitigation findings must be supported by substantial evidence); *National Parks & Conserv. Ass'n v. County of Riverside*, (1999) 71 Cal. App. 4th 1341, 1366 (same).

CEQA requires that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." CEQA Guidelines §15126.4(a)(2). To assure the fulfillment of this commitment, we request that the Authority include clear and specific criteria for monitoring implementation, binding deadlines, and a public right of enforcement when adopting its Project commitments and mitigation measures. We ask that the public right of enforcement provide that any board, officer, person, corporation or association or by any person acting for the interests of itself, its members, or the general public have the right to bring a legal complaint to enforce compliance with these commitments and mitigation measures in state or federal court. Providing for a public right of enforcement would be consistent with implied and express commitments made in the DEIR and provide the best and most effective

guarantee that the Project commitments and mitigation measures will be fully implemented.

### 2. Energy

California law requires the EIR to contain "[m]itigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Cal. Pub. Rec. Code § 21100(b)(3). The discussion of these mitigation measures should "explain why certain measures were incorporated in the project and why other measures were dismissed." CEQA Guidelines Appendix F § II.D.(1)

The DEIR does contain two energy-related mitigation measures: (1) exterior lighting regulated by automating shut-off (Mitigation Measure F-14, DEIR p. 564) and (2) plans and specifications to ensure that all Project buildings meet California Title 24 Energy Efficiency standards for water heating, space heating and cooling. (Regulatory Measure F-2, DEIR p. 565). The mere inclusion of these mitigation measures is woefully inadequate. The EIR should analyze a full range of mitigation measures that would reduce the Project's energy impacts. The LEED Guidelines should provide a sound basis for this analysis.

### 3. Traffic Mitigation

The City of Los Angeles Department of Transportation (LADOT) proposes to mitigate traffic impacts through implementation of Transportation Demand Management (TDM) programs with respect to development of the major parcels, implementation of Adaptive Traffic Control System technologies in the area, as well as selections from a "menu" of mitigation measures to be determined at a later date by LADOT. With the exception of the very specific proposal around improvements related to the ATCS system, the mitigation measures included in the DEIR are vague. It is difficult to determine exactly how the calculations of the effects of the mitigation measures were done when it is not clear which ones will ultimately be pursued. The developer and LADOT should be required to specify exactly which traffic mitigation measures will be required, which will be promoted and how implementation will be monitored.

Mitigation Measure B-5 involves an upgraded ATCS program. (DEIR, pp. 318-19.) This mitigation measure is supposed to mitigate significant traffic impacts at six intersections in the morning peak hour and three intersections in the evening peak hour. (DEIR, Appendix B, p. 160.) Mitigation Measure B-4 involves a Transportation Demand Management (TDM) program to be implemented if the County Office Building option is pursued. (DEIR, p. 318.) This measure is calculated to mitigate a significant traffic impact at one intersection in the evening peak hour. (DEIR, Appendix B, p. 162.) *Yet the DEIR, even in the relevant appendix, fails to provide the evidence and analysis showing how and to what extent these plans actually mitigate traffic impacts.* Some additional explanation as to method is provided in the Appendix. (DEIR, Appendix B, pp. 158-

179). But while conclusions are included, the factual bases for those conclusions are not. Thus, the substantial evidence standard is not met.

Traffic impacts must be further mitigated. The DEIR concludes that truck activity may cause significant traffic impacts during construction. (DEIR, p. 254). At the same time, the DEIR concludes the impacts of traffic generated by workers traveling to and from the work site would be negligible. (DEIR, p. 255.) Noticeably, the DEIR fails to recognize that truck traffic and worker traffic considered cumulatively would cause significant impacts. (DEIR, p. 312.) In reaching the conclusion that worker trips are insignificant, the DEIR assumes without foundation that workers would arrive and depart during non-peak hours. Absent any substantial evidence for this assertion, the DEIR must provide mitigation measures to mitigate this cumulative significant impact.

The DEIR concludes that even after other mitigation measures are implemented, the Project would result in significant traffic impacts, thus exacerbating an already well-below acceptable traffic situation. Specifically, during operation (after construction) the Project would cause one significant impact on intersection service levels in the morning peak hour and 13 significant impacts in the evening peak hour. (DEIR, p. 322.) There are a number of changes to the Project itself that could serve to reduce its traffic impacts.

Given the aforementioned fact that lower-income people have much higher rates of public transit usage, even given similar levels of service availability, one way of reducing traffic impacts could be to increase the proportion of affordable housing units. If greater numbers of units in the Project were made available to people of low- and very-low incomes, it could be reasonably anticipated that the impacts on the local transportation networks would be significantly reduced. A commitment by the developer to increase the proportion of affordable housing should be included in this EIR as a mitigation measure for its anticipated traffic impacts.

In order to mitigate truck and worker traffic, the DEIR should discuss and recommend a strong local hiring program in connection with construction and operation. Local hiring would increase the number of workers who can walk to the job site, decrease the number of cars traveling to and from downtown, and decrease car emissions. The trip reductions would occur not only because of the tendency of people of lower incomes to use public transit, but also because of the high degree of proximity of low-income communities such as Skid Row to the Project. In addition, local hiring has the potential to provide work for low income individuals and even reduce demand for public assistance. By contributing to the economic advancement of low-income downtown residents, the Project may also simultaneously enhance its efficacy as a revitalizing force in downtown generally. Therefore, we would suggest that the developer be asked create a program to hire low-income residents of the downtown area as one means of reducing the number automobile trips to be generated by the Project. But the DEIR neglects to quantify or even mention this mitigation measure. Arguably, this omission violates CEQA Guidelines. CEQA Guidelines § 15126.4(a)(1)(B).

**4. Air Quality Mitigation**

Despite a number of mitigation measures put forward in the document, the air quality impacts related to construction and permanent operations remain significant and allegedly unavoidable. Air quality impacts also must be further mitigated. The South Coast Air Quality Management District (SCAQMD) Air Quality Management Plans (AQMP) recommend implementation of all feasible mitigation measures. (DEIR, pp. 551, 552.) CEQA Guidelines §15126.4(a)(1)(B) minimally require discussion of available mitigation measures and explanation of the basis for selection of mitigation measures implemented. Further, for every significant effect, an EIR must provide sufficient information to enable lead agencies to make one of three findings, including the following: "(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. . . . (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or project alternatives identified in the final EIR." CEQA Guidelines § 15091(a).

We believe that there is much more that could be done to mitigate the air quality impacts of the Project. The DEIR does not require or even mention local hiring as a mitigation measure. The DEIR informs that even after other mitigation measures are implemented, emissions of $NO_X$, CO, and VOC would exceed the threshold of significance for regional impacts during construction, while $PM_{10}$ and $NO_2$ emissions would have a localized significant impact during construction. (DEIR, p. 566.) During operation, CO, VOC, $PM_{10}$, and $NO_X$ emissions would have a significant regional impact despite the use of other mitigation measures. (DEIR, p. 567.) Local hiring, with its reduction in traffic, would further mitigate some of these harmful emissions. Thus, the DEIR must discuss this mitigation measure.

In addition, the DEIR does not require or mention the use of selective catalytic reduction systems to mitigate nitrogen oxide emissions, though the DEIR found that nitrogen oxide emissions will be significant. (DEIR, pp. 540-43, 547, 554, 556, 558-59.) Even after implementation of identified mitigation measures, nitrogen oxide emissions would constitute a significant impact, both during construction and operation. (DEIR, pp. 566-67.) This omission runs afoul of CEQA Guidelines § 15126.4(a)(1)(B).

Nor does the DEIR adequately discuss the use of diesel particulate filters. (DEIR, p. 563.) Diesel $PM_{10}$ constitutes "[t]he primary source of potential air toxics associated with proposed Project operations". (DEIR, p. 547.) Yet diesel $PM_{10}$ remains a significant impact during both construction and operation even after other mitigation measures are employed. (DEIR, p. 566-67.) The DEIR does not provide analysis to establish the feasibility or infeasibility of diesel particulate filters as a mitigation measure. Consequently, the DEIR deviates from CEQA Guidelines § 15091(a), which requires lead agencies to determine whether mitigation measures are feasible, whether they have been required in or incorporated into the project, and whether they avoid or substantially lessen the impact. CEQA is designed "to ensure that feasible mitigation measures will actually

be implemented as a condition of development, and not merely adopted and then neglected or disregarded." *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles*, 83 Cal. App. 4th 1252, 1261 (2000). The present DEIR does not facilitate this purpose.

Similarly, the DEIR fails to evaluate the extent to which each air quality mitigation measure decreases the corresponding significant impact. The DEIR provides more specific analysis when discussing traffic impacts, but not in discussing air quality. As mentioned above, EIRs must provide sufficient information to allow an agency to determine whether each proposed mitigation measure avoids or substantially lessens the relevant significant impact. CEQA Guidelines § 15091(a). Here, the DEIR provides only cursory and inadequate analysis. In order to comply with CEQA and serve its purpose, the DEIR must provide clear analysis of the effect of each mitigation measure.

As noted, one means of mitigating emissions would be use the Leadership in Energy and Environmental Design – New Construction (LEED-NC) standards developed by the U.S. Green Building Council to guide Project design and construction practices so as to minimize the regional impacts of emissions related to energy use. LEED for New Construction and Major Renovations (LEED-NC) is a green building rating system that was designed to guide and distinguish high-performance commercial and institutional projects, with a focus on office buildings. Practitioners have also applied the standards to K-12 schools, multi-unit residential buildings, manufacturing plants, laboratories and many other building types. We again encourage the developer to seek platinum certification under the LEED guidelines, utilizing the cleanest and most energy efficient building standards.

In order to reduce emissions associated with private automobile usage, the developer should encourage public transit usage by paying for free transit passes for workers and residents of any new development up front during the construction phase. The transit pass would then come with the residential or commercial space in the same way that a parking space commonly does.

As noted, the downtown Los Angeles area already suffers from poor air quality and its related health impacts. The Project, as envisioned, would make a bad situation even worse. As a means of mitigating these impacts, the developer should agree to fund community environmental health programs to study health needs, environmental indicators, levels of exposure and establish clinics and other programs to address and ameliorate these impacts.

### 5. Proactive Mitigation Measures and Community Benefits

The DEIR inadequately and inconsistently addresses a number of issues related to the economic and social impacts of the Project. The Authority should adopt mitigation measures to minimize the negative economic impact of the Project and to render the Project consistent with its stated purposes.

The Coalition recommends that the following Community Benefits be implemented as mitigation measures:

**a. Local Hiring.** As noted, local hiring would make possible reduced traffic and emissions impacts, and help ensure that the Project has a positive social and economic impact. The Project should have local hiring goals and requirements of up to 50%, which should be set at different levels in these three primary areas: Construction, Construction Apprenticeships and Permanent Jobs. Specifically, the Coalition seeks a minimum goal of 30% and a requirement of 15% for local hiring in construction jobs, all of which should be *new* hires, and a minimum goal of 50% and a requirement of 30% for local hiring in permanent jobs which may include jobs in the service sector as well as in administrative and managerial positions. The Project should also maintain an agreed-upon percentage of apprentices throughout. We would also like to see that job applicants for local hiring be targeted as:

(1) First Priority: Low-Income Individuals living within a two-mile radius of the Project.
(2) Second Priority: Low-Income Individuals living within a five-mile radius of the Project.
(3) Third Priority: Low-Income Individuals living in census tracts or zip codes throughout the City for which more than 80% of the households, household income is no greater than 80% of the median household income for the Standard Metropolitan Statistical Area.

**b. Job Training and Retention Services.** The Project is estimated to generate over 5,300 permanent jobs and 24,000 construction jobs. These proposed job training and retention services are essential to ensuring that local hiring can occur on a meaningful scale, and to support the above local hiring goals. The Project should provide $10 Million (or 1% of total Project cost) in funds prior to groundbreaking to support and expand existing resources for a first-source hiring program, job training for permanent jobs, coordination with apprenticeship programs and apprenticeship-preparation programs for construction trades jobs. In addition, these funds should also support job retention assistance such as child care and literacy, to help meet the needs of a diverse population. This investment would allow 2,500 local residents to receive training and services essential to accessing and retaining jobs on the Project. The funding should come from public funds raised by the Coalition and matched by the Developer.

**c. Union Jobs.** In order to ensure a positive social and economic impact, the Project should have a Project Labor Agreement for all construction jobs that includes the local hiring requirements discussed above. The Developer should require card check neutrality agreements for all hotel facilities, including restaurants, and all building services, including janitors and security guards. The Developer should support security officers' right to select the union of their choice (including SEIU) and should only hire responsible security contractors committed to raising standards and

abiding by labor laws. The Developer should support the L.A. Safe and Secure Initiative for a City program that raises building security standards, and the developer should support SEIU's involvement in that program. The developer should only use responsible janitorial and window washers contractors that meet all prevailing standards. Lists of qualified responsible contractors that provide janitorial and maintenance services for commercial, residential, and public spaces are available upon request from SEIU Local 1877.

**d. Affordable Housing.** As noted, the Project is expected to generate 5,300 permanent jobs and 24,000 construction jobs. Yet, even households with members earning the Living Wage required at the Project do not reach 50% of AMI. Currently, the Project is expected to provide a maximum of only 412 affordable housing units, only a portion of which will be affordable to households at 50% of AMI. In order for the Project to actually contribute to an improved jobs-housing balance, many more housing units affordable to individuals working on the Project are necessary. Specifically, 25% of all Project units should be affordable to Households between 30% and 50% of the Los Angeles Area Median Income, without the option of in-lieu fees, broken down as follows: 25% affordable to families earning zero to 30% of Area Median Income ("AMI"); 75% affordable to families earning up to 50% of AMI. This includes both rental and ownership units.

**e. Homelessness Prevention.** The extensive downtown population of homeless and nearly-homeless, as well their need for decent housing with supportive services, is well documented and easily observed. In order to mitigate the noted emissions impact on these residents, the Project should contribute its share to the ongoing efforts of many organizations to provide supportive housing and decent work to low-income and homeless downtown residents.

The Project should help capitalize a revolving loan fund that can be used to develop permanent supportive housing units for homeless individuals and families in the downtown area. These units would be operated by existing downtown organizations with demonstrated success of ending homelessness for individuals through directly providing housing and/or housing placement with supportive services. Additionally, a percentage of the on-site housing affordable to extremely low-income people should be targeted for homeless people, in coordination with downtown homeless service organization that specialize in housing placement.

**f. Open Space.** The Project proposes to allocate $50 million for park space in downtown, while nearby low-income communities suffer from well-documented and significant needs for open space for children and families to use for recreation. Thus, the Project should redress this inequity by sharing revenue to support open space creation in those communities.

**REQUEST FOR NOTIFICATION**

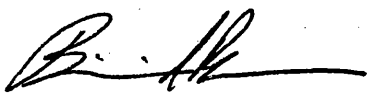
Pursuant to California Public Resources Code Section 21092(b)(3), we request that the Authority please mail any and all public notices or information concerning the DEIR to:

Benjamin S. Beach
Staff Attorney
Community Economic Development Unit
Legal Aid Foundation of Los Angeles
8601 S. Broadway
Los Angeles, CA 90003
Phone: 213-640-3968
Fax: 213-640-3988

**CONCLUSION**

In conclusion, we request that the Authority include in the administrative record for the Project these comments and the exhibits attached hereto. We also request, and CEQA requires, that the Authority consider these comments and prepare a written "good faith reasoned analysis" in response to our comments. CEQA Guidelines §15088(b). This analysis cannot include conclusory statements unsupported by facts. *Ibid.* Thank you for considering and responding to our comments.

Respectfully submitted,



Benjamin S. Beach
Staff Attorney

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LOS ANGELES CONSERVANCY

August 2, 2006

Ms. Martha Welborne
Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Re: Draft Environmental Impact Report – Grand Avenue Project

Dear Ms. Welborne:

I am writing on behalf of the Los Angeles Conservancy to provide comments on the Draft Environmental Impact Report (DEIR) for the Grand Avenue Project. The Conservancy, the nation's largest local preservation organization, was founded in 1978 to preserve Los Angeles's historic and cultural resources through advocacy and education.

*Significance*
Our review of the DEIR focuses on the project's potential impact on the historic and cultural resources of the Los Angeles Civic Center. The Conservancy agrees with the document's conclusion that the Civic Center contains a potential California Register Historic District as delineated in Figure 41 (page 441). **We believe that it is critical that no aspect of the proposed project jeopardize this district's eligibility or potential future designation**. The project site that is depicted in Figures 2 and 3 (pages 102-103) overlaps with identified cultural resources at only one location, the Civic Center Mall, which is located at the heart of the potential historic district. This area, therefore, is the focus of our commentary. The project site does, however, abut several identified and/or potential historic resources including the County Hall of Administration, the County Courthouse, the Music Center, Disney Hall, the Hall of Records, the County Law Library, and City Hall. Though no work is proposed in the DEIR that will directly impact sites outside of the project boundary, the Conservancy reserves the right of future comment regarding potential direct or ancillary impacts on these sites as the current conceptual design scheme(s) are finalized.

The DEIR correctly identifies the portion of the existing Civic Center Mall bounded by Grand Street on the west, the Kenneth Hahn Hall of Administration on the north, Hill Street on the east, and the County Courthouse, on the south, as a significant historic landscape that is individually eligible for listing on the California Register and would be

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a contributing feature of the potential Civic Center historic district. The Conservancy additionally believes that this area, also known as the Paseo de Los Pobladores (the Paseo) may also be eligible for listing on the National Register of Historic Places, both individually and as part of a larger district, despite the DEIR's finding to the contrary.

The DEIR finds that the portion of the Mall between Hill Street and Broadway, known as the Court of Flags, is not individually eligible for listing on the California Register, but appears eligible as a contributing feature of the potential Civic Center historic district. This finding is predicated on the area's spatial relationship with the adjacent open space and structures, rather than for any intrinsic design importance or other significance acquired over time. The Conservancy feels that if this area is treated as an open, landscaped space that reflects and enhances the historic axiality of the Mall, substantial alterations to it will be acceptable. We believe that the same holds true for the open parking lot at the eastern end of the Mall between Broadway and Spring Street.

*Project Impacts*

The Conservancy believes that the Grand Avenue Project must respect and retain the historic features and character that define the Paseo. This portion of the Mall continues to reflect an important point in time at which the city's long-planned and oft-delayed Civic Center was finally realized. It is a critical aspect of the story of the historic development of downtown Los Angeles and is also one of the most important and intact mid-20th century public spaces to be found anywhere in the city.

That said, we also recognize that this space has never realized its full potential in terms of public accessibility and use. Hidden from the view of both passing pedestrians and motorists, its primary users appear to be employees and visitors of the adjacent government buildings. The Conservancy sees the lack of visual and physical access from Grand and Hill Streets as the primary impediment to making the Paseo a vital and widely-used component of the Civic Center. A revitalized Paseo and expanded Civic Center Mall will become a tremendous asset not only for the Grand Avenue Project, but also for those working in and visiting the Civic Center, as well as the thousands of new residents choosing to make downtown their home. We see the potential for significant alterations and modifications to this area that will increase its accessibility. At the same time, we believe these changes can be made in a manner that will retain not only specific character-defining historic features, but also the historic character and ambiance that make the Paseo one of the city's most important historic landscapes.

The "Conceptual Plan for Civic Park" depicted in Figure 7 (page 121) indicates that the Paseo portion of the Mall is being considered for a radical alteration that would remove and/or relocate many, if not most, of its identified historic features. **If this plan is implemented, the Conservancy strongly believes that the Paseo's potential eligibility for listing on the California Register will be lost.** The DEIR states that the Conceptual Plan "does not represent the only development scenario that would be possible." We hope that the project team will develop a new design that allows for significant changes at the east and west ends of the Paseo to improve accessibility while also preserving the integrity of the historic landscape through the retention of its significant features.

Recognizing that the Conceptual Plan (shown in Figure 7 and discussed on pages 121-123 of the DEIR) is preliminary and highly schematic, it does offer the clear suggestion that the design team is entertaining certain concepts that we find unacceptable. Specifically, we are concerned about:

- The relocation and/or resizing of the Arthur J. Will Fountain. The fountain is one of the most important components of the Mall's historic landscape and we believe it should be left in place and made something to be celebrated rather than tucked in the corner. Its importance on the Mall's central axis is underscored by its relationship with the Music Center fountain and the DWP Building.

- The steps and terraces shown descending into the park from Grand Avenue appear to necessitate the proposed relocation of the fountain. We fully support the new grade-level plaza on Grand Avenue that will overlook the new park. We feel, however, that new steps and landings on either side of the existing fountain could create the dramatic sense of entry the designers appear to seek, while also preserving the symmetry that is an important aspect of the Paseo's historic Modernist design.

- The loss of all historic circulation paths, retaining walls, and elevator enclosures will remove significant historic fabric and eliminate the Paseo's Modernist design integrity, which is still remarkably intact. We also believe that the meandering walkways and amorphously-shaped lawn area shown in Figure 7 do not respond to the project's stated goal of finding design solutions that work with the Modernist design of the County Buildings. This drawing also suggests that the cross-axial plaza that currently links the Mall-facing entries of the County Buildings will be eliminated. Given the steady traffic between the buildings, we believe that this area should remain paved and would perhaps serve as a suitable location for some of the new pavilions and/or kiosks being proposed for businesses serving the patrons of the new park.

*Character-Defining Features*

The Historic Resources Technical Report [DEIR, Volume 3, Appendix C, page 66] identifies seven "architecturally specific character-defining features of the park [Paseo] that support its individual eligibility for State designation." These are:

1. the Arthur J. Will fountain and pools
2. the pink granite-clad planters and retaining wall, along with the concrete benches
3. the circulation system (concrete walkways and open space)
4. the elevator enclosures at the center of the Paseo
5. the light poles and speaker poles
6. the spiral automobile ramps at Hill Street
7. the spiral automobile ramps and granite-clad stairs at Grand Avenue

Four of these, numbers 1, 2, 4, and 5, are identified as "key features." The Conservancy agrees with the report's finding that the removal or substantial alteration of the majority of these "key" features would lead to a substantial adverse impact, and believe that they

should be retained *in situ* to the greatest extent possible. This is especially true of the Arthur J. Will Fountain, which is perhaps the most important individual feature of the Paseo's historic design as well as one of the few notable public Modernist fountains to be found anywhere in the city. We do concur with the report's finding that the spiral automobile ramps will be largely retained even if they undergo grade-level alterations to improve access to the park and that this work will not result in a significant impact. Additionally, we do not believe that the loss of the existing stairways at Grand Street will result in any change in the Paseo's eligibility for listing on the California Register.

We do believe the Paseo's existing circulation plan (number 3 above) is historically important. Though we see room for the reconfiguration of the paved walkways to accommodate changes related to increased accessibility at the east and west, we believe that the linearity and symmetry of the existing design should be respected in any new design and that the cross-axial plaza area that connects the entrances to the County buildings should be retained. We also believe that many of the mature trees that make the Paseo a pleasant site today should be allowed to continue to do so in the new design, particularly along the north and south edges of the site.

*Alternatives*
Alternative 4: Alternative Design [DEIR pages 813-827] comes very close to meeting the Conservancy's goal of retaining the Paseo's historic character and its eligibility for listing on the California Register. We believe that a slightly modified version of this alternative could meet all project goals, allow alterations that will greatly enhance accessibility to the Civic Park, and also retain the character-defining features and overall character we hope to see protected.

Our issue with Alternative 4 is its creation of an artificial nexus between the design of the Civic Park and the placement of the two towers on Parcels L and M-2. The location of the proposed towers is not related to either the design of the Civic Park or the Paseo's historic features and character. The DEIR states that, "the change in location of the towers on Parcels L and M-2 would not have any effect on historic resources...." Given this, we see no reason for Alternative 4 to link these unrelated aspects of the project. Our concern is that the preservation-minded portion of this alternative may be dismissed because of independent issues related to the construction of the towers.

Overall, we believe the preservation-oriented portion of Alternative 4 will meet our goals and strongly support the adoption of its preservation-oriented portion in the Final EIR, calling it, perhaps, the "Preservation Alternative." We also think it critical that the document reference not only the Secretary of the Interior's *Standards for Rehabilitation*, but also the *Guidelines for the Treatment of Cultural Landscapes.*

The Conservancy could also support Alternative 2, which proposes that no work occur at the existing Civic Center Mall. We do, however, see great value in increasing the Paseo's visual and physical accessibility from the street, as well as in the development of enhanced and additional park space on the lots between Hill and Spring Streets, and therefore have focused our comments on Alternative 4.

*Conclusion*

The Conservancy sees a magnificent opportunity in the Grand Avenue Project's inclusion of the Civic Center Mall within its scope. Once one ascends or descends into the park from the street, there is a sense of surprise about how pleasant the space seems. What was a moment before invisible, reveals itself to be a hidden oasis, awaiting discovery. By allowing more people than ever to discover and use the Paseo, the project will be doing a great favor to the city. But by erasing what is there today, by removing not only a beautiful and functional park, but also an important part of the history of the city and its development, is a disservice - we will lose something that cannot be brought back.

As we have noted above, we see many failings in the design of the Paseo in terms of how it addresses Grand Avenue and Hill Street. Improvements in accessibility, and the consequent alterations and new construction that this will require, will undoubtedly change the appearance of the Paseo. But these do not need to obliterate what is there. The Secretary's *Guidelines for the Treatment of Cultural Landscapes* allow for significant interventions when they are made in conjunction with significant preservation – a situation we hope to see recommended as the Conceptual Design is refined and the Final EIR is prepared.

We believe that our preservation goals will mesh smoothly with the project goals if the following elements are retained in the manner we propose:

- the Arthur J. Will fountain and pools – *in situ*
- the granite-clad retaining planters and retaining walls – *in situ* and/or reconfigured to meet needs of new design
- the pedestrian circulation system – in concept, respecting the linearity and axiality of the historic design
- the granite-clad elevator enclosures – *in situ*
- the light poles and speaker poles – *in situ* or relocated as required by the new design
- the mature trees located along the north and south edges of the Paseo – *in situ* or relocated as required by new design

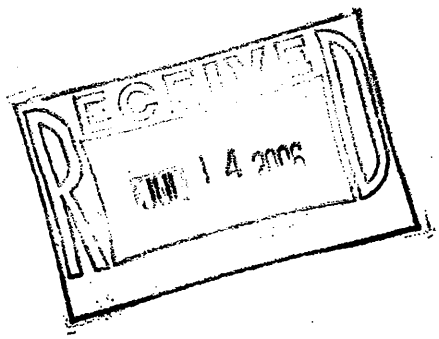
Thank you for your consideration of our position. Please feel free to contact me if you have any questions.

Sincerely,

Jay Platt
Preservation Advocate

MUSIC·CENTER
PERFORMING ARTS CENTER
OF LOS ANGELES COUNTY

July 13, 2006




Martha Welborne
Managing Director
Grand Avenue Committee
c/o California Community Foundation
445 South Figueroa Street, #3400
Los Angeles, CA 90071

Bruce Lackow
Principal
PCR Services Corporation
233 Wilshire Boulevard, Suite 130
Santa Monica, CA 90401

Re: The Grand Avenue Project – Response to the Draft E.I.R.

Dear Martha and Bruce:

I am writing on behalf of the Music Center of Los Angeles County, including our resident companies: the Los Angeles Philharmonic Association, the Center Theater Group of Los Angeles, the Los Angeles Opera and the Los Angeles Master Chorale.

First let me state that all of us at the Music Center are fully supportive of the Grand Avenue Project. We are certain that the project will bring enormous economic, social, civic and cultural benefits to the Los Angeles region. And, we are certain that the project as conceived will be a positive for cultural organizations Downtown. The Grand Avenue Committee and The Related Companies have been conscientious in seeking our views and we appreciate that.

The Music Center and the Project have a unique relationship. As Los Angeles' leading arts institution – serving close to 2 million patrons a year – the Music Center is situated directly across the street from the Grand Avenue Project. One of our venues, Walt Disney Concert Hall, home to the Los Angeles Philharmonic and the Los Angeles Master Chorale, will be at ground zero for Project impacts between 1st and 2nd Streets along Grand Avenue. The rest of the Music Center campus – including the major parking facility – sits directly across from the proposed Civic Park. Indeed the Music Center

Plaza is conceived as being integral to that Park complex. So, while we applaud the Project and look forward to its completion, we must take steps to assure that project

impacts relative to construction disruptions, access, traffic and noise are thoughtfully mitigated with special involvement from and timely consultation with representatives from the Music Center.

The Music Center, with its four venues and plaza, is an active performing arts, educational and community center that is busy from early morning to late at night 365 days a year. The business of the performing arts and related educational programming involves access by patrons via all modes of transportation; regular pedestrian access; frequent large convoys of school buses; and large vehicular traffic bringing sets, equipment and supplies. Two of the largest civic-center parking complexes sit beneath our buildings. As such vehicular and pedestrian access to our facilities during construction will be of major concern to us.

Of course, as a performing arts center, construction noise is of concern as well. We were able to work through these concerns while building Walt Disney Concert Hall and the recent Grand Avenue Street improvements. But we know that heavy impact or sustained, high pitched construction noise can impact rehearsals and performances. Advance planning and preparation can allow the Project managers and Music Center representatives to work together to mitigate the adverse impacts upon Walt Disney Concert Hall and our other venues.

I want to keep our points simple and direct and will avoid section-by-section referencing of the report which would be repetitive. We hope and expect that the Grand Avenue Committee and Related Companies will embrace our recommendations for a cooperative effort.

With respect to the impacts of construction and eventual operations upon access, parking, street closures, traffic disruptions and related **traffic and circulation** impacts, the Music Center strongly urges that the governing authority require the formation of a standing working committee comprised of Music Center representatives (including LA Phil representatives) and appropriate Project construction managers. The purpose of this committee will be to assure that the Music Center is regularly consulted well in advance of the preparation of specific mitigation plans and that there is close, collegial and cooperative communication between Related and the Music Center on a day-by-day basis during construction so we mutually work around problems that we may create for each other.

We are also concerned about impacts from **noise**. We operate world class performance facilities. It might not be apparent, but performances, rehearsals, technical sound preparations and the like are going on all the time; from early morning until late at night.

While Disney Hall and the other venues are designed to insulate the performances from the world outside, we have learned that high levels of external noise, rumbling and reverberation may interfere with the performing, rehearsing and technical work in the theaters. We believe that with thoughtful and cooperative advance planning we can mitigate all or most of these potential problems. The working committee that we have recommended can also address these noise concerns.

In nearly every one of the proposed mitigation measures in the report there is a requirement that "prior to the start of each construction work phase..." Related and the Civic Park parties submit the specific mitigation plan(s) to the appropriate City and County authorities. While each of the mitigation measures does require that the Music Center (which includes Walt Disney Concert Hall) be given a copy of the specific mitigation plan, we believe that this is not sufficient nor in the best interests of all parties. The Music Center's unique location relative to the Project, our mission and our strong need to preserve access for our patrons, calls for a level of regular, timely and meaningful communication. This ought to take place on a regular basis so as to allow Related and the Civic Park developer to take the Music Center's requirements into their construction planning and to help shape the specific mitigation plans. I should note as well that the Music Center's normal operations have the potential to impact the Project construction. With advance planning we may be able to avoid such impacts.

We know that plans can be affected by the day-to-day realties of construction. We are realistic about this. Our principal concern is that there be an established, working mechanism for communication between the developer and the Music Center so that we can all avoid surprises. The fact is that the drama and impacts of the Grand Avenue Project will play out right in front of Disney Hall on a daily basis over several years. In our view, the establishment of a working committee, with regular participants, will facilitate the sort of collegiality and cooperation that can solve problems when they arise and minimize the negative impacts. The communications can develop into a mix of face-to-face interaction and e-mail or phone contacts. It will save time and cost over the long run.

I have every reason to believe that the Grand Avenue Committee, led by Martha Welborne, will embrace our recommendation and that, together, we can prepare a plan to establish such a working committee to be incorporated into the Final EIR.

Thank you for your attention to this matter.

Sincerely,

Stephen D. Rountree
President

SDR: es

cc: Supervisor Gloria Molina
Councilwoman Jan Perry
David Janssen, Chief Administrative Officer, County of Los Angeles
Deborah Borda, President, Los Angeles Philharmonic
Charles Dillingham, Managing Director, Center Theatre Group of Los Angeles
Mitch Heskel, Operations Director, Los Angeles Opera
Terry Knowles, Executive Director, Los Angeles Master Chorale
John Emerson, Chairman, Music Center Board of Directors

**From:** Joyce Dillard [dillardjoyce@yahoo.com]
**Sent:** Thursday, August 03, 2006 3:30 PM
**To:** Grand Avenue Committee
**Subject:** Grand Avenue EIR Comments Due August 3, 2006

Grand Avenue EIR Comments Due August 3, 2006

The Civic Park in any of the plans should remain in the public as is the land ownership and current governance. Under no circumstances should the governance be privatized in any way, shape or manner including the formation and/or use of a public non-profit corporation. No programs in other states should be substituted as examples of governance in our City.

Our heritage is of a Spanish system through the Mexican government. Eastern cities, like New York, grew on a British system of governance, without the focus on the Ciúdad or city. The land use was much different. The Plaza Church is the true center of the City of Los Angeles, and consequently, the County of Los Angeles. The Four League measurements (four corners of the city) emanated from the Plaza Church. This park, □Paseo de los Poblosdores Park□ is the journey outward and not the main focal point of Los Angeles.

Today, we consider Downtown LA as the center of the city, but the historical perspective must be retained.

The governance of the Civic Park should be retained in the public domain as a County Parks and Recreation asset or a City Recreation and Park asset with a Park Advisory Board who can guide usage for events and activities. The Ralph M. Brown Act can allow the public an input on park issues.

A public non-profit corporation is excluded from the Ralph M. Brown Act law which would disenfranchise the resident user.

The value of parks is most clearly stated by J.F. Mendenhall in the □Office of the Commissioners of City Parks Report of the Superintendent□ from December 12, 1901:

□I quote from a former report, □There is no expenditure of money for a public improvement of any kind, aside from a good supply of pure water,

well-paved and well-kept streets, and good schools, that pays so well as public parks. This is a recognized fact in all parts of the world, and there is no idea spreading so fast and taking such deep hold upon the people of this County as the Park idea. People flock to the parks if they have but an hour for recreation, and its is to our parks the stranger is always first taken that we may impress him in the most favorable manner as to the beauty of our City and its surroundings, as well as to inform him of the enterprise and cultivated tastes of our people.□

And our people in Los Angeles are varied from origin of ancestry, language, culture and tastes. Here, this park can reflect a welcome mat to our residents and to our visitors.

Quoting from J.F. Mendenhall from the □Office of the Commissioners of City Parks Report of the Superintendent□ from December 12, 1901:

□In conclusion we wish to impress upon the minds of our citizens, every man, woman and child, that public parks are owned by them. This ownership should be fully realized and every one should be brought to feel that they are heartily welcome to enjoy to the fullest extent all the benefits such grounds afford, subject only to such rules and regulations as are indispensable, both for their protection and the proper maintenance of the property. We wish the people to know that this is the first aim and end of the Park Department, and that only by such cooperation can the full blessings of the parks be enjoyed.□

Superintendent J.F. Mendenhall stated in the December 11, 1901 □Office of the Commissioners of City Parks Report of the Superintendent□:

□The increase in attendance of visitors to the parks has been gratifying. As greater advantages for picnic resorts and pleasure grounds are provided, the people find their interest increased, and the parks have become an attraction to all classes. Instead of being a mere luxury for the special benefit of the rich they are pleasure grounds for the poor and are the cheapest luxury a city can enjoy.

In looking over the history of the past few years we find that public parks, as now conducted, are of modern conception. In the year 1855 New York City purchased 800 acres north of 59th street, at that time quite a distance in the country, and the foundation of the renowned Central Park was laid. The example set by the City of New York, in the creation of Central Park has fulfilled a mighty and truly civilizing mission,

surpassing by far the most sanguine hopes and predictions of its far seeing founders. It has given rise to a chain of public parks and boulevards encircling, as it were, all centers of wealth and population in the country. Before this purchase the famous Boston Common, consisting of 48 acres, was the only public park worthy of mention in the United States. The Common was originally designed as a cow pasture for the benefit and convenience of the public in the early days of Boston Town. The good citizens of Boston could not agree as to the measure of its disposal and it was retained as a play ground for the children, and a practice ground for the militia on training days, and all idea of disposing of it for utilitarian purposes was forever abandoned. I had the pleasure of visiting this park, or play ground, 27 years ago, and just before the era of improvement began. About this time Boston purchased additional ground, and from time to time kept adding to the park area until the present time, which now embraces 2378 acres, and the expenditures in the past 27 years has been over $18,000,000. The park area of Los Angeles is 3737 acres, and the total expenses to this date has (sic) been about $620,000. A conservative estimate of the park land, without the improvements, would be $780,000. This value appears to be increasing at a greater rate than the annual expenditures of the Park Department. What would be the value of our park land at this time if park development had been entirely neglected in the past few years?

The history of the marvelous development of many of the leading cities of the United States is intimately interwoven with that of their Public Parks, the material and moral force of which has been a powerful factor in the increase of population and enhancement of values of real estate.

The ownership and development of a Public Park is the cheapest luxury a city can enjoy, because the thing itself creates the very wealth from which its cost is paid.

A suitable and attractive system of Parks and Boulevards is of great and unmeasurable (sic) advantage to any city, in the promotion of the health, happiness, culture and well-being of its citizens and in its attractive power to draw to itself constant accessions of cultivated and agreeable people from other parts of the Country----□He who plants a tree works for posterity.□ □

Posterity should be the key in design of the Park.

With that, the modern era of design should be considered historical in nature. The fountain should be restored. Because of increased costs and liabilities, splash fountains have replaced those earlier designs. The pools should have the same consideration. We should restore and honor that work and keep it in its original place.

As a user of this park, the pink granite marble works for the area.

This park acreage is 16 acres□small but critical to the Central City. Commercialization is NOT the key to a successful park. We have shopping areas to satisfy that greed.

According to this EIR document, □The intent of the Civic Park is to revitalize activity and with improved public facilities and enhanced security.□

This area is also close to the Pasadena Freeway, not known as the Arroyo Seco National Scenic Byway. This is a gateway to the northeast section of Los Angeles, the Los Angeles River and the Arroyo Seco. That Arroyo Seco identity is one of greenery and open space. This is historical in nature and a point of tourism with its Museums of the Arroyo Seco.

The modern era design of the Grand Avenue Streetscape Plan needs to take into account that Spanish and Victorian eras and honor it with some aspect of the design from those eras as a flow through to the Arroyo Seco.

Rename the park PASEO DE LOS POBLOSDORES PARK and connect TWO grand avenues!

No where do you mention the work of the Integrated Resources Water Management Plan (IRWMP) in its twenty year vision in progress of water assessment, water quality and watershed. How is this Environmental Impact Report integrated with that work? This park can utilize methods of conservation and reuse. How do you plan to integrate the IRWMP goals into this report? Please refer to the website:

www. lawaterplan.org

On page 62 of Volume I, the word METHANE is used, but in relationship to testing. In Volume II, page B-16 under Hazard and Hazardous Waste; you consider the impact Less Than Significant Impact. About 35 years ago, my husband was a construction worker building the Hall of Records at Temple and Broadway. They hit oil.

Where is that mitigation mentioned? Is there an ongoing monitoring of methane gas already? Is there a cover-up?

How safe is the park with an underground area of oil resource? Where is your research of the Environmental Impact Reports from the surrounding buildings in the plan?

HOW SAFE IS THE AREA FOR CHILDREN?

Greenbuilding has not been considered in this document? Why was that alternative disregarded for this project considering it is in the boundaries of a City that is part of the LEEDS program?

The entire project is very adult in concept. Where is the integration of Downtown LA?
Where in this design is the inclusion of children and families and their needs, especially during the weekends? Where are the weekday jurors and court employees□ needs taken into consideration? Can all cultures reflected in today□s Los Angeles feel welcome and not excluded? To quote Superintendent J.F. Mendenhall, where is plan for □the enterprise and cultivated tastes of our people□?

The concepts lack a vision of inclusiveness. The impacts are more than significant, require mitigation and proper planning and should be reflected in this Environmental Impact Report.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

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Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
http://mail.yahoo.com

**From:** NatureBase@aol.com
**Sent:** Wednesday, July 19, 2006 11:04 AM
**To:** EIRcomment@grandavenuecommittee.org
**Subject:** A comment

Hi. This project would be a great opportunity to demonstrate how southern California native plants can be used in public landscaping. Native plants use less water, fertilizer (none!) and soil amendments than most ornamental varieties. Native plants also represent our local natural heritage and they provide beauty throughout the year.

Successful large-scale native plant projects already installed include the 7-acre berm around the Donald Tillman Water Reclamation Plant in Van Nuys and approximately 500,000 native plants used for landscaping along the 13-mile MTA Orange Line across the San Fernando Valley.

The time is right for California natives! Please specify southern California native plants for landscaping this project.

Sincerely,

Steve Hartman
4444 Longridge Avenue
Sherman Oaks, CA 91423

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THE GRAND AVENUE PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

OPEN HOUSE AND PUBLIC INFORMATION MEETING HELD
TUESDAY, JULY 18, 2006
6:02 P.M.

CATHEDRAL OF OUR LADY OF THE ANGELS
CENTER AT CATHEDRAL PLAZA
MEETING ROOMS 6, 7 AND 8
555 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012

REPORTED BY:
CATHERINE PONICSAN, RPR
CSR NO. 8271

FILE NO. P06621

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SPEAKERS FROM THE DAIS:
MARTHA WELBORNE
Managing Director
Grand Avenue Committee
BILL WITTE
The Related Companies
BEA HSU
The Related Companies
BRUCE LACKOW
Christopher A. Joseph & Associates

SPEAKERS FROM THE AUDIENCE:
LINDA VALVERDE
ROBERTO CARBAJAL
SISTER DIANE DONAGHUE
GENERA DOGON
DEBORAH BURTON
SAMUEL SANCHEZ
GILDA HAAS
ALBERTO TLATOA
RUSSELL BROWN
BEN BEACH
ESTHER ALEJANDRO
BENJAMIN TORRES

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ALSO PRESENT:
NATHAN SPRINGER
Outreach Specialist
Lee Andrews Group
English/Spanish Translater

JOAN EARLY
Vice President
Lee Andrews Group

ROXI REEVES
Community Outreach
Lee Andrews Group

LOS ANGELES, CALIFORNIA; TUESDAY, JULY 18, 2006
6:02 P.M.

MS. WELBORNE: Good evening, everyone. I think we'd like to get going so we have plenty of time for the meeting.

I'd like to welcome you all here. My name is Martha Welborne. I'm managing director of the Grand Avenue Committee.

The committee -- I think many of you know this, but Grand Avenue Committee acts as staff to the Los Angeles Grand Avenue Authority, which we commonly refer to as the JPA, which is responsible for this project.

It's important for you to know that the Joint Powers Authority is the lead agency for SEQA, and so it's the JPA that will ultimately review and take action on the EIR.

The purpose of the meeting tonight is for us to listen to you. This is not a general community meeting. It's not one of our typical outreach meetings.

Tonight we are focused exclusively on the draft EIR.

The EIR was made available to the public on June 14.

And there are several forms of comment -- of ways for you to comment on the EIR. We are offering this meeting tonight as one additional way.

You can -- if you speak tonight, your comments will be recorded, and will be responded to when we complete the final EIR.

You can also submit comments in writing through the mail, by E-mail, by filling out a comment form tonight.

And these were out on the desk when you checked

in.
Comments are due August 3rd.
And after August 3rd, we will then launch into the drafting of the final EIR.
The process for the evening is that we will start with two brief presentations.
First, Bill Witte, the lead developer from The Related Companies, will give an overview of the project components.
Next, Bruce Lackow, our environmental consultant, will describe the SEQA process, and give a summary of the draft EIR analysis.
After that, we then open the floor to public comment.
To join in on giving us your comments, we would

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ask you to fill out the blue card, the speaker card, and either bring it up to the table here or hand it to Roxi back in the back -- in the back of the room there.
We need to have your name and address for the record. There is a place for that on the card.
And we will use these cards to call on you as a speaker and to bring you up to the microphone. The microphone is right up here in front.
As is typical at an event like this, we have a court reporter here tonight to record everyone's comment. And she would like to ask that each of you when you get up to speak, once again repeat your name and affiliation and address.
So that everyone who has a chance to speak who wants to speak, we are allowing each speaker a maximum of three minutes. There will be a timer that comes on to the screen that will run the three minute countdown.
With that, I would like to introduce Bill Witte, who will, I think because of his voice, introduce Bea Hsu. But here is Bill.
MR. WITTE: That's exactly what I will do. I apologize, but I don't have much of a voice tonight.
So without further ado, I'm going to ask Bea Hsu, our vice president for development, to briefly describe the project.

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MS. HSU: Hi, my name is Bea Hsu with The Related Companies, and I'm today the voice of Bill Witte, and I'm just going to briefly walk you through a project overview.
First, lights please.
There are basically three major components to the Grand Avenue Project.
The first is the Civic Park, and the second is the Grand Avenue streetscape.
The third is the development parcels, which includes five development parcels -- parcels Q, W-1, W-2, and parcels L and M.
Here is another look at the development site, just with the conceptual plan that was prepared last year.
The Civic Center Park is a 16-acre area. It's to be delivered as part of phase one.
This is the mid-block area stretching from Grand all the way to Spring Street.
And the goal of the park is to revitalize and expand upon and activate the existing Civic Center Mall

through a new design that's functional and accessible to it.

The design intent will be to facilitate a program of ongoing special civic events and activities, and three blocks will be designed to either function separately or as a whole for larger events.

The idea is the streets would stay open and you would still have three blocks: One from Grand and Hill, one from Hill to Broadway, and one from Broadway to Spring.

And those blocks could be used individually, or altogether, if there were to be a larger event.

The next major component is the streetscape program, which is planned to run from all the way from Cesar Chavez to Fifth Street, and there would be a phased development along with the three development phases.

The anticipated improvements would include: Widening shady sidewalks where feasible, and landscape and streetscaping, and arrange the street furnishings, which may include lighting, benches, trash receptacles and way finding systems, as needed.

Finally, development parcels.

Starting with parcel Q, which is the block right across from the Disney Hall just easterly of Grand Avenue -- that's intended to be phase one of development, which would include:

500 units of housing, 20 percent of the units -- or 100 -- would be affordable.

A 275-room hotel.

And 284,000 square feet of retail.

Parcels L and M, which are the parcels westerly of Grand Avenue and just to the south of Disney Hall, would be developed as phase two.

It includes:

850 units of housing, 20 percent of which would be affordable, or 170 units.

And 101,000 square feet of retail.

Parcels W-1 and W-2, which are the blocks easterly of parcel Q, are anticipated to be developed as phase three of the project, and it includes:

710 units of housing, 20 percent of which would be affordable, or 142 units.

64,000 square feet of retail.

And 681,000 square feet potential county office building, which would be the replacement office building for the current Hall of Administration.

Or, should the county not elect to locate a replacement Hall of Administration on this site, that square footage would instead be converted to an additional 600 units of housing -- again, 20 percent of which would be affordable, an additional 120 units of affordable housing.

And with that, I'm going to turn it over to Bruce Lackow, with Chris Joseph, who will provide the rest of the program tonight.

MR. LACKOW: Great. Thank you, Bea. Let's see.

Let's start out with that you have probably heard a lot about the project before at any number of

community meetings or any other forms of communication, whether it be the Authority's website or some mailings of that sort.

But you probably -- but it's possible you may not have heard a whole lot about the environmental impact report, or one of acronyms which we will use -- we will try to keep the acronyms to a minimum -- and that is the EIR.

So what I'd like to do is walk you through not only the process for the EIR and what the purpose of tonight's meeting is, but I'd also like to walk you through some of the key findings of the draft EIR as a means of helping to bring you into the project's environmental review process, which is a very important and critical process that's not only required by state law, but is very, very important for public participation, and is an important way for you as the public to become involved with the project at this level.

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Let's start out with a little bit about the purpose of the meeting tonight.

As Martha had indicated, the draft EIR is currently in public review.

It started in public review on June 14 and will continue through August 3rd.

The August 3rd date is a very key and important date, because that is the statutory required deadline for submitting your comments on the draft EIR.

There are several ways to review the draft EIR.

You can see it at the county or CRA's offices.

It's also available at the local public libraries.

It's available on the Internet.

And you may also purchase a CD, some of which we have available tonight; and if we run out, we will just take your name and well be able to forward a copy of the CD to you very shortly.

The purpose of tonight's meeting really is to listen to your comments.

While the presentations are an important point of departure for your comments, the real purpose of the meeting tonight is to listen.

Because the main purpose of the meeting is to listen, we will not be responding to specific questions

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about -- criticizing or making comments about the environmental impact report.

However, we will answer factual questions about both the project and the draft EIR.

As Martha had also indicated, there are three ways to comment on the draft EIR.

Tonight's meeting is one of them.

You may also mail in written comments to the Authority.

Or you may E-mail written -- you may E-mail comments to the Authority as well.

All comments, whether they are given tonight or in writing or via E-mail, will be responded to in writing in the final EIR.

And once again, to reiterate the importance of the deadline, the deadline for submitting comments is August 3rd of 2006.

The final EIR will also include a transcript of tonight's meeting.

I just want to walk through some of the major milestones in the SEQA process. Some of them are history. Some of them are current. And some of them are in the future.

Obviously, we know a lot about the past and we know a lot about the present, and we have some

projections about the future.

The notice of preparation, which is the start of the SEQA process, was issued on August 31st of last year. It circulated for a 30-day period.

Within that 30-day period we held a public scoping meeting, which we invited the public -- just as we are tonight -- to come in and help us understand what are the issues of concern for the community.

We then started to prepare the draft EIR. We started that in September of 2005. And it took us about nine months to complete the draft EIR.

And then it got circulated in June.

There is typo up on the screen. The start date for the draft public review period is actually June 14, not June 10. And I apologize for that typo.

So the draft EIR public review period under SEQA can be no less than 45 days.

We decided to add a few extra days because of the importance of the project to the community and to the decision makers to allow the public and other public agencies a couple extra days to respond to the comments -- to respond to the draft EIR.

So actually the public review period for this project is set at around 50 days.

At the close of the public review period, we

are going to take in all the input you provided -- tonight's meeting, E-mail, written comments -- then we are going to sit down and we are going to start writing responses and prepare the final EIR.

We are currently forecasting this will occur over the summer and fall of this year.

Once the final EIR is prepared, the environmental impact report is ready for public review -- for public hearing, rather. I apologize for that.

We are currently forecasting that the public hearing process for the project will be conducted in the fall of 2006, with certification of the EIR by the Authority, by the Board, in -- also in fall the 2006.

The SEQA process starts with a document called an initial study.

What the initial study does is that it provides a first review of the potential environmental impact of the project, and it looks at everything that could possibly be affected by the project.

In conducting this analysis, we determined that the following issues would not have significant impacts, and therefore did not require further review in the draft EIR, those being:

Obviously, agricultural resources -- don't see very much crop growing in this part of Los Angeles.

Biological resources; archaeology and paleontology; earth resources; and hydrology.

In contrast to this relatively short list, what's provided next is an overview of the issues analyzed in the draft EIR.

There were a total of 16 different environmental issues analyzed in the draft EIR, including:

Land use; traffic, circulation and parking; esthetics and visual resources; historical resources; population and housing; air quality; noise; hazards and hazardous materials; fire services; police services; schools; parks and recreation; libraries; water supply; wastewater; and solid waste.

An important part of an environmental impact report or EIR is not only the analysis of the impacts that the project will have on the environment, but also looking at alternatives to the project.

In conducting this EIR, we identified a total of five different alternatives for the project.

SEQA, which is the California Environmental Quality Act, which is the law that governs the preparation of EIRs, says that you can analyze a no-project scenario, which is leaving things the way they are.

And that the no-project scenario can happen in one of two ways:

It can be a do-nothing scenario, which in the case of our document called the "No-Project A" alternative.

Or the project could develop under its existing land use regulatory controls.

Normally, that's defined by the permitted zoning on the project site.

In this case, because parcels Q and W-2 were part of an earlier owner participation agreement, dating back to the early 1990s, that document and the permitted land uses in that document defined the alternative, the No-Project B alternative relative to those parcels.

We did use zoning to define the land uses permitted under parcels L/M-2and W-1.

Under this alternative, development was on the order of:

800 residential units.

About 65,000 square feet of retail.

About a million and a half square feet of office development.

And 400 surface parking spaces.

The next alternative that we looked at, which is very standard and typical for EIRs, is a reduced density alternative.

In this case, the reduced density alternative was set at a 25 percent reduction in all the developed land uses at the project site.

This resulted in an alternative that consisted of:

About 1500 residential units.

About 200 hotel rooms.

About 340,000 square feet of retail.

And about 510,000 square feet of office development.

We also looked at an alternative design for the project -- one of the things that we will get into a

little bit later is this notion of significant impacts.
And under SEQA, significant impacts are the most important impacts of all.
So what this alternative tries to do is it tries to reduce or eliminate some of the significant impacts of the project.
There were two specific types of significant impacts this alternative was designed to respond to.
One was potential significant impacts associated with the implementation of the proposed Civic Park and with regard to historic resources.
And the other was looking at ways to reduce

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view impacts for those who live in the Grand Promenade Tower residential building by moving the towers on parcels L and M-2.
The land to be -- the amount of land to be developed under this alternative is the same as the project.
The last alternative that we analyzed in the draft EIR is we said: How would the impact to the project change if we eliminated almost all of the commercial development and made this almost an exclusive residential development?
And that alternative became known as the alternative land use alternative.
Under that, the alternative calls for the development of about 3400 residential units, and about 35,000 square feet of retail floor area.
One of the things that SEQA asks you to look at is: What are the impacts to the project if you developed it in a different location?
When we looked at the project, this project is so integrally linked to these specific development parcels -- obviously, the Civic Park is a fix, the Grand Avenue streetscape is a fix -- so there really wasn't a way to really relocate this project to another location.
So the alternative site analysis was determined

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to be not appropriate for this project.
Now, let's take a look at the EIR analysis itself, now that we have a basic primer on what SEQA is and what SEQA is trying to do.
The first thing that's very important when looking at a project is: When is it going to finish?
Because SEQA asks you to look at the project at its completion.
The completion year for the Grand Avenue project as currently contemplated is 2015, or roughly an eight-, nine-year time frame from the point of certification and project approval.
As Bea had mentioned in her presentation, the project may be developed in one of two ways -- and this really has to do with a decision on the part of the County of Los Angeles to proceed with a county office building on the project site.
So we have two scenarios that were both analyzed in the draft EIR equally.
So we have the project with county office building option, and, as Bea had indicated, that has:
2060 residential units, 412 of which would be affordable.
It has 681,000 square feet of office

development.

449,000 square feet of retail development.
And 275 hotel rooms.
In comparison, the project with additional residential option -- and this is what happens if the county decides that this particular development -- this particular project location is not the right place for the relocation of the Hall of Administration or if they decide not to relocate the Hall of Administration at all -- under that scenario, you exchange the 681,000 square feet of office development it for an additional 600 residential units.
So then you get under this scenario:
2,660 residential units, 532 of which would be affordable.
No office development.
And the same amount of retail and hotel development.
Also, what's important is that under both development options, what happens in the Civic Park and what happens with the Grand Avenue streetscape is the same.
Now, let's talk about some very specific environmental issues.
When everyone thinks of development in Los Angeles, it really comes down to first and foremost

on a development of this size and magnitude is: What are the traffic impacts of this project?
We analyzed the traffic impacts in consultation and under the guidance of the Los Angeles Department of Transportation.
They reviewed the project's traffic study, and they approved the project's traffic study.
The traffic analysis analyzed both construction impacts -- impacts that happen during construction of the development -- as well as impacts after the development is completed and fully operational.
The analysis of construction impacts identify three types of short term temporary traffic significant construction impacts:
One is associated with haul trucks, particularly those traveling during AM peak hour, when everyone is trying to get to work.
Temporary lane closures during construction.
And one of the aspects of the Civic Park improvements is reconstructing the ramps that lead to the parking garage under the main block of the Civic Park.
Now, focusing on the -- now focusing on the operational side, the traffic analysis analyzed 32 intersections in an area bounded by the 101 Freeway on

the north, Spring Street on the east, Sixth Street on the south, and Figueroa Street on the west.
In addition, the traffic analysis analyzed 14 different freeway locations along the Harbor, Hollywood, Santa Monica, Golden State and Pomona Freeways.
Now, it's time to talk about the results of that analysis.
What I have done here is given you a tally of the traffic impacts before and after mitigation, so we

can understand what are the traffic impacts of the project, but it also gives us an opportunity to understand the effectiveness of the traffic mitigation measures that have been developed for the project.

As you can see, the impact profile under the two development options is fairly similar, but, not surprisingly, the development option with residential -- with more residential has fewer traffic impacts because what we are doing is: We are trading residential units for office development, and residential units generally have less traffic impacts, particularly during the peak hours, in comparison to office development.

So before mitigation, with the office building, there are:

Seven significant impacts in the AM peak hour.

17 in the PM peak hour.

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And two of the freeway locations are significantly impacted.

In comparison, the residential option has:

One less significant impact in the AM peak hour.

The same number of significant impacts in the PM peak hour.

And the impacts on the freeway locations go away.

Then the mitigation package was developed for the project's traffic impacts.

The seven significant impacts under the office building option dropped to one in the AM peak hour. Very effective mitigation package.

In the PM peak hour, it dropped from 17 to 13, also a fairly effective mitigation package.

And then -- but most importantly and what we all like to see is: The significant impacts on the freeways went away.

With regard to the residential option, the mitigation package was even more effective.

With regard to the AM peak hour, all of the significant impacts went away.

In the PM peak hour, the number of significant impacts were reduced from 17 to seven.

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And there were no impacts on the freeway under the residential option.

There were a few other aspects of the traffic analysis that we also thought were relevant and important to talk about tonight, one of which is about the Civic Park.

If the Civic Park is successful, as everyone hopes it will be, it will also create some activity in the area, so that the Civic Park events will infrequently cause significant traffic impacts.

Now, turning our attention to parking -- because while traffic is important -- and very important -- parking is also very important.

The project meets the Municipal Code requirements, the zoning requirements for parking.

However, there is a policy that is currently under review for revision that establishes a higher parking rate than what is in the Municipal Code.

And what the project is doing is it is requesting a variance in the event that the policy is

not changed prior to certification of the final EIR.
Variances of the type that are requested by the project are very typically granted by the city for projects in the downtown area, as the policy is really geared towards the parking demands of projects that are

more in the -- what are, quote, the more suburban areas of the city, not the downtown core.
One last point on traffic is that the project impact to the off-site parking supply -- that's the parking that's available in all the buildings and surface parking lots around the project site -- are also less than significant.
That takes care of traffic.
Another very important environmental issue and impact area is historical resources. Some people think traffic is the most important.
If you love old buildings, you probably think that historic is the most important.
Let's start by saying there are several culturally and historically significant buildings in the project area.
These include not only old buildings but new buildings as well -- Walt Disney Concert Hall, the Music Center, the County Courthouse, the Cathedral we are in tonight, the Kenny Hahn Hall of Administration, and other buildings in the area.
The Civic Center buildings, structures, objects and sites also appear eligible for designation as a potential historic district.
So that's where not only are individual

buildings important, but that there is some fabric that is created that ties the buildings together that also creates an importance at a historic level.
When we look at the impact of the project on these historic resources and potential historic resources, we see that there are no impacts associated with the development parcels.
That's parcels Q, W-1, W-2, L, and M-2.
If the Civic Park and the Grand Avenue streetscape improvements are developed in substantial compliance with the current conceptual plans, then no impacts to off-site historic resources would occur.
However, to make sure that the impacts are not significant, we have identified a series of mitigation measures to further support and protect the resources.
Looking at the existing Civic Center Mall, which is the location of the future Civic Park, it appears to be eligible for individual listing in the California Register, as well as a contributor to the potential historic district.
Implementation of the proposed Civic Park may result in the removal of what are called character-defining features.
What character-defining features is is a really important term and concept with regard to historic

resources, so I'll take just a few seconds to explain it.
What character-defining features are are those elements -- in this case, of the existing Civic Center Mall -- that really create a sense of its history.

And what's very interesting is: Things that may not be of value to the general public, for those with a heightened expertise in the area of historic resources, these things can be very, very important because they denote an important part of history of the city, architecture, a particular period of time, or a particular architect, or a particular event, and things of that sort.

And significant impacts would occur to the character-defining features of the existing Civic Center Mall if any of the following occur:

The water feature that's located -- both the fountain and the associated pools -- no longer serve as a focal point for the employee.

Many of the pink granite clad planters, pink granite clad retaining walls, and concrete benches are not retained and reused in place or within the reconfigured park.

The existing elevator shaft structures are removed.

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Or many of the light poles and the hi-fi speaker poles with saucer-like canopies are not retained in place or relocated appropriately.

One other concept to help understand is the federal government has established what are called Secretary of Interior Standards, and these are guidelines that help states and cities and the county implement and protect historic resources.

So if the Secretary of Interior Standards will be used so as to not affect those historic characteristics that qualify the Civic Center mall for potential California Register listing -- if the character-defining features are retained or reused consistent with the Secretary of the Interior's Standards, then significant impacts would not occur.

However, depending upon the final park design, this may not be possible.

And as a result, mitigation measures are identified to reduce the impact, but not to a less than significant level.

Once again, that notion of a significant impact being the most important under SEQA.

Other features of the existing Civic Center Mall may be removed without causing a significant impact.

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Being an urban planner and a city planner at heart -- and my personal background is in that aspect of the field -- land use is always an important issue, so I'd like to close out the review of specific issues with just a very brief, very quick bullet listing with regard to the issue of land use.

All of the project components, whether they be the development parcels, the park or the streetscape, are all consistent with surrounding uses.

The project is also consistent with the following land use plans, many of which -- some of which you are familiar with, maybe others of which you are possibly less familiar with but starting with the General Plan Framework, the Central City Community Plan, the Bunker Hill Design for Development, the Amended Central Business District Redevelopment Plan, the

Downtown Strategic Plan, the Civic Center Shared Facilities and Enhancement Plan, and SCAG's Regional Comprehensive Plan and Guide.

SCAG is the agency that oversees planning activities at a regional level.

So the project is consistent at a city level, at a local level, at a CRA level, and also the SCAG level.

One thing that does bear importance with regard

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to the land use issue, and that's the project does require zone changes and variances in order to be implemented as proposed.

The zone changes and variances are required due to the density proposed for parcels W-1 and W-2 as well as L and M-2, and also to allow hotels, restaurants, signage, public parking and alcohol service on a portion of parcel Q -- the portion that's zoned residential as opposed to the portion that's zoned commercial.

While the zone changes and variances to the Municipal Code standards are required, that -- it's important to note that these are not inconsistent -- or rather a better way of putting it, that the proposed zone changes and variances are consistent with the Central City Community Plan as well as the Bunker Hill Design for Development.

Now, it's time for the conclusion and sort of wrapping up what -- I appreciate your patience with a fairly lengthy presentation, but I thought it was important in order to help understand what the environmental impact report is, because there is a reasonable chance you may not have had a chance to review the document before tonight's meeting.

Looking at conclusions, all feasible mitigation measures have been recommended in the draft EIR.

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Nevertheless, the following significant impacts occur:

Land use, as a result of the variance -- need for variances, and a zone change.

Traffic and parking, as we talked about during construction, as well as operations.

Aesthetics and visual resources, due to a few impacts from a few locations, and shade/shadow impacts on a cumulative basis, which is the impacts of this project and all other planned projects in the downtown area.

Historical resources, because the character-defining features of the Civic Center Mall may not be able to be retained or reused per the Secretary of the Interior Standards.

Air quality, during construction, as well as operations.

Noise, during construction for the sensitive noise receptors that are located in close proximity to each of the development parcels.

Police services -- this one is significant only at a cumulative basis, and only if the City does not add enough resources to the LAPD to allow it to successfully accomplish its mission. We don't expect there not to be enough police officers, but just to be conservative, we

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decided to call it a cumulative significant impact on

the EIR.

And parks and recreation only as a function that the existing Civic Center Mall, which is an important park and recreation the space for the downtown population, will not be available during the periods of construction in the Civic Park.

Because of these significant impacts, the EIR certification requires adoption of a statement of overriding considerations.

All other impacts of the project are reduced to less than significant levels.

And in closing, the deadline for submitting comments on the draft EIR is August 3rd, 2006.

That concludes my presentation for this evening, and it's time for me to stop talking and to start listening to what you folks have to say.

So with that, we will switch over to the public portion of the --

MS. WELBORNE: For those of you that might have come in when the presentation was underway, if you would like to speak please fill out a blue speaker card, and either bring it up here, or give it to someone in the back of the room.

Bruce will call your names out for those of you

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who have already filled out your cards, and we would ask that you come up to the microphone in the front, and repeat your name -- because we are recording the session, repeat your name, affiliation and address.

And then please give us your comments.

MR. LACKOW: As you see, there is a very large three minutes up on the screen.

MR. RUSSELL BROWN: Is there a distinction between public comments about the project, and just questions about your presentation?

MR. LACKOW: What we will try to do, if there are questions about the presentation that don't get into the analysis in the draft EIR that are just factual in nature, I'll do my best to answer them, you know, as part of the interaction.

What you will do is: You will make your comments. I will jot down your questions.

And before I go to the next speaker, I will do my best to try to answer them.

I may not be able to answer all your questions tonight. If I don't answer them tonight, they will be answered, regardless, in the final EIR.

MS. EARLY: And if speakers would please use that microphone, so we can record their comments.

MR. LACKOW: Yes. And once again, just to

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reiterate that point for the benefit of all, we'd like for to you come up to the front and use the microphone, really for the benefit of the rest of the audience, and also our court reporter, who has a very, very difficult job trying to keep up with all of us tonight, and anything we can do to try to make her goal a little bit easier, I think would be an admirable goal for us tonight.

With that, I'd like to call up the first speaker, Joseph Thomas.

MR. THOMAS: My name is Joseph Thomas. I'm affiliated with LA CAN, and also a community resident.

All right. One way to reduce the emissions and traffic impacts of construction is to ensure that individuals employed during construction already live near the project.

The draft EIR projects that there will be 250 to 600 construction worker on site per day.

For many parts of the region, there is no suggestion that any number of downtown or nearby residents will be among those working construction.

That means lots of lengthy commutes by car, and heavy traffic.

The authorities should consider an aggressive local hiring program for construction as a mitigation

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measure to correct this problem.

The EIR and actions by government always seem solely focused to bringing people in to live where they work.

But equally important, current downtown residents would like to work where they live. Thank you.

MR. LACKOW: Thank you, Mr. Thomas. Next speaker is Deborah Burton.

MS. BURTON: My name is Deborah Burton, and I work at -- I live at 622 South Wall Street. I work with the Los Angeles Community Action Network, and I'm also a downtown residence.

The EIR states that the project's construction may result in temporary lane closures that could potentially affect emergency access, and that construction activities may temporarily increase the demand on fire services due to the presence of combustible material.

Emergency access is critical to the downtown community, especially given that we have a disproportionally high number of elderly residents and residents with disability.

Any delay in emergency services to this group is significant. It could mean life or death.

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Example, now there is a lady who is having a heart attack, and we call the fire department because they are close.

But they have to go at least a half mile in order to get to a place that's only a block away because of the lane closures.

We got all these trucks moving in.

So I mean, she is right there, they are a block away, and he has to go a half a mile in order to get to her.

So that would be, I mean, a ways. So I think you should consider how this would affect residents in the downtown community. Thank you.

MR. LACKOW: Thank you, very much. Next speaker Linda Valverde.

MS. VALVERDE: Excuse me. My name is Linda Valverde. And I'm a downtown community resident. Also I work downtown with Los Angeles Community Action Network.

And I'm here to express concern over the project's air pollution that will strongly impact the men and women who live downtown, roughly 8,000 of whom live outside.

Construction on the project is projected to last nine years.

The hauling of excavated material will consist of 300 truck trips a day for six to eight months.

The draft EIR concludes that there will be significant and unavoidable cumulative impact from construction emissions.

In particular nitrogen oxide and particulate matter emissions are projected to be at particularly dangerous levels.

Numerous scientific studies have documented the severe health risks that arise from dangerous levels of particulate matter and diesel emission associated with both on-road and non-road construction equipment.

New studies show chronic exposure to particulate pollution shortens life by one to three years.

A study of the 90 largest U.S. cities found strong evidence linking daily increases in particulate pollution levels to increases in daily death rates and in hospital admissions of the elderly.

These results are consistent with a study of 12 European cities.

Particulate pollution has been tied to low heart rate variability, a risk factor for heart attack.

A chamber study with human subjects found that concentrated air particles can induce pulmonary inflammation and increase concentration of fibrinogen in the blood, a risk factor for clotting and heart attack.

There are more than 8,000 homeless people living close to the Grand Avenue project. They are at risk of 24-hour exposure to the construction emissions.

Many are already in difficult health conditions with limited access to medical care.

Yet there is no analysis in the draft EIR of the human health risk of this population of either the project, itself, or cumulative impact of the 93 related projects.

MR. LACKOW: Thank you, Ms. Valverde. Next speaker -- I hope I have this name right -- Genera Dogon. I apologize if I got that wrong.

MR. DOGON: Good afternoon, ladies and gentlemen. My name is Genera Dogon.

MR. LACKOW: Dogon. With a G.

MR. DOGON: I'm a member of LA CAN. I'm also a downtown community resident, and a point man on the community watch team downtown here, downtown on Skid Row.

And my question is: The EIR states that increased activity within the five development parcels and Civic Park would likely result in increased demand for police services.

Through the provision of project security personnel in the park, the demand for services provided by LAPD is not anticipated to increase over existing conditions.

This raises two important points.

First, private security may or may not decrease the demand for LAPD services.

Currently in downtown, private security guards

work closely with LAPD and are often accompanied by LAPD officers while performing their duties.

Second, the use of private security in the park raises questions about access to the park by all downtown residents, including homeless residents.

For example, Pershing Square, right here on Fifth, is a public park, but right now it's all roped off with yellow crime scene LAPD tape.

Pershing Square has a long-time private security, but two seconds after LAPD comes into the park, the park security guards lose their protocols and we got LAPD dictating to the park guards.

Now, you claim this park will be open.

Now, when LAPD comes into the park, what are you going to do to stop LAPD protocols from roping off this park and taking over the park and throwing out who they see as unfavorable?

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And could you please print these statements in your pages in your report.

MR. LACKOW: Thank you very much, Mr. Dogon. Next speaker is Roberto Carbajal.

MR. CARBAJAL: Hello, my name is Roberto Carbajal. I'm an iron worker and I'm a welder with iron workers and a welder for about eight years -- I mean, since 1980.

But I have only worked one time downtown. That was in 1980. And since then haven't been able to get a job in downtown.

I'm a downtown resident.

I'm scale, where I sometimes qualify for GOR, gone through several people, including the CRA, I believe it's called, USEF, City Hall -- all kinds of people trying to get on these job sites.

I even went to the Cal Trans job site and asked them how does one get on this job site, I understand for residents and low income people, they are supposed to have priority on these jobs.

And they said they had no idea what I was talking about.

There was nobody regulating that.

I was hoping maybe you could have some kind of office, some sort of special -- like an employment draw

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-- with the backing of the -- Councilman Huizar's office, and Fabian Nunez, the speaker of the House, like an oversight committee.

Because there should be somewhere where I can call and they can hook me up with a job.

I have got three welding licenses. There is no reason why I shouldn't being working downtown.

Staples Center has four-hour tryouts where you would go -- they would give you four hours. They could move you, they could bounce you, but they could still claim you as a minority or as a woman as if they had hired you. They could write that off. And they what they hired you for was four hours.

I was hoping you could held us get jobs downtown. Thank you.

MR. LACKOW: Thank you, Mr. Carbajal. Next speaker is Samuel Sanchez. Is Mr. Sanchez in the room? No? Oh, great. Better late than never.

MR. SANCHEZ: I'D just like to start out by

saying I was at a meeting at the LACMA several weeks ago discussing project ideas brought on by different artists, conceptual artists and environmental people about this site.

And a lot of them were really thought out and maybe even some of them were far-fetched, but most of them didn't seem to incorporate the idea of sustainable living.

And in an area where many of our residents have less than an acre per thousand people -- I think I have heard the quote at that same meeting, at the LACMA, that said that the LAUSD is the second largest user of concrete in America, seconded only by Cal Trans.

So when we think about that, we should really incorporate that into what we do with our building.

I know that there is a civic space there in the middle or a central green area, but what natural organic living plants do -- that you can eat -- do to the environment that grass cannot, is clean our water.

I'm not sure of all the details of the Corn Field project, but I know that certain projects such as the South Central Farm and others actually clean L.A.'s water.

When it rains on grass that has been treated with herbicides and pesticides, that water goes into our ground water, and it cannot sustain life when you spray pesticides on it.

Now, another thing I wanted to bring up in my minute is: I have worked in L.A.

I worked for the carpenters union on a building that was formerly known as the Mobil Oil building. It was on the corner of Sixth and Flower.

And I'd like you to consider the environmental impacts of all the concrete and things that will be broken up and created, and the effects of silicosis on the lungs of children in the environment.

And when I worked in that building on Sixth and Flower, although we were supposed to, a lot of the abatement processes were not followed accurately or honestly.

And I myself was exposed to a lot of asbestos and silica dust, even though I had the proper PPE.

Now, when I saw the abatement done by the people who were licensed to do it, I saw those particulates going into the air constantly.

They did their projects at night and they were covered by tarps, but dust was continually flying out of the abatement process.

I'd like you to consider that when you think about the destruction of concrete and different things that will happen in this project, and the trucks that will fly by emitting all sorts of other pollutants. Thank you.

MR. LACKOW: Thank you, Mr. Sanchez. Next speaker, Gilda Haas --

MS. HAAS: I think Sister Donaghue has to leave --

MR. LACKOW: Okay. She was next, but we will reshuffle the deck.

MS. HAAS: Thank you.

SISTER DONAGHUE: My name is Sister Diane Donaghue, Esperanza Community Housing, and I'm here representing the Grand Avenue Community Coalition. And we will have additional comments on the 3rd of August deadline.

Our perspective is not just about environmental impacts and mitigation, but about people and sustainable development.

Our concerns are grounded in questions about who is impacted by Grand Avenue, who pays for this impact, and who benefits.

In reviewing the EIR, several points are clear.

A stronger nexus needs to be built between transportation, housing and jobs at a level of detail that will produce meaningful results.

This project is uniquely situated for this to be possible.

A stronger relationship needs to be built between the benefits that may be derived from this project and the underserved, underhoused, and underemployed residents of Skid Row in South Central Los Angeles.

These two efforts, taken to a refined level of specificity will improve the effectiveness and reach of the mitigations proposed by the draft EIR.

The Grand Avenue project is uniquely situated in a downtown area between the representatives of extreme poles of downtown.

It's walking distance from the magnificent new assets, including Disney, and the new Cathedral.

It is also walking distance from Skid Row, where the nation's largest homeless population resides near other low income people who live in residential hotels.

This project includes alternative scenarios, one which includes a new county office building, and another includes additional housing.

Of all the environmental impacts, traffic is one of the most intransigent and complex due the fact of an enormous development boom in downtown.

The EIR cites over 90 related projects that contribute to these impacts.

Nevertheless, it's clear that we have a significant impact on traffic in Los Angeles.

The County of Los Angeles is the largest employer, with many of the workers of diverse ranks and salaries located in county office buildings within a relatively small radius of the project.

The county also pays the lion's share of the benefits to Skid Row.

A stronger nexus between the project and these facts could result in a much stronger traffic mitigation, adding project viability as well as community benefits.

In short, in the EIR, the devil is in the details, and much more detail has to be made available in the description of environmental problems, rather than in solutions.

Although it's commonly the case, this opportunity could be an incredible example of things to come. Thank you.

MR. LACKOW: Thank you, Sister. Next speaker will be Gilda Haas.
MS. HAAS: I was basically going to say that.
MR. LACKOW: Okay. Thank you, Ms. Haas. Next one is -- I apologize if I mispronounce the name -- and that's Alberto Tlatoa.
MS. TLATOA: Good afternoon, everybody. I'm Alberto Tlatoa. You got it right. Thank you.
I have a couple of concerns.
How can you make it accessible for everybody in

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L.A.?
I mean, it's already expensive to be in downtown. When you come and park, it's like $12 for parking.
So how is it going to be accessible for people of low income areas to come down and enjoy this park?
And also, what kind of businesses will be invited in this project?
Because we usually see the Starbucks and McDonald's. How are you guys going to improve the quality of more healthy food in that area, and snacks are also going to be available for the people.
And also for the affordable housing, what will be the income required of low income to move into downtown?
It's already expensive to live downtown, so how would you guys help people to come down and to come and enjoy this affordable housing you guys are creating?
That's about it.
MR. LACKOW: Thank you very much for your comments. Next speaker is Russell Brown.
MR. BROWN: Good evening. My name is Russell Brown. I'm president of Residents Association of Downtown L.A. I'm also the co-chair for the Historic Core Neighborhood Grant Committee, and the organizing

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chair for Alton Downtown L.A., which is a 500-member social organization.
We are very much in support of this project. We look forward to the Civic Park. The quality of the design is really quite good.
I'm glad you were able to bring Frank Gehry in.
The community-serving retail is really a component that is desperately needed downtown.
The new housing, I think, will add a great complement into the Bunker Hill area, especially the affordable housing, which is pretty much being done with no public subsidy.
I think this is going to be fairly successful creating a sense of place where right now we don't have that.
We especially like the fact that it's adjacent to major public transportation, including the subway.
We look really forward to creating a new neighborhood here and having a great place to do big civic events that I think can be recognized worldwide.
So we complement you on your plan.
I do have one question: In the EIR I didn't understand if you move the county headquarters basically across the street, and it's an even exchange, why that's suddenly registered big significant added impacts?

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To me, it would seem like it should have been exactly even.

MR. LACKOW: Okay. Basically -- I will try to answer that, and we will give you a more complete answer in the final EIR -- is that we did not assume that the occupancy of the existing hall would be eliminated.

We assumed that the existing traffic levels associated with that would continue in the future.

So we took the conservative position that the project would be additive on top of that, rather than a net wash.

Basically, we have two more speaker cards. Those are for Ben Beach and Esther Alejandro.

And if there is anybody else who wants to speak, we would request that you fill out a speaker card and bring it up to the table.

If not, then we will go with these two speakers, and we will do one more last call.

Ben Beach?

MR. BEACH: Good afternoon. My name is Ben Beach with the Legal Aid Foundation of Los Angeles.

One item I'd like you to address is the height of the microphones in the project, which are clearly insufficient to accommodate the need of all residents downtown.

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MR. LACKOW: Are you feeling better now?

MR. BEACH: Wow, this is a serious mitigation measure right here.

So my name is Ben Beach, Legal Aid Foundation of Los Angeles.

I'm here to raise two points about the EIR.

The first relates to construction emissions.

As you have heard from prior testimony, residents of downtown are seriously impacted by the construction emissions associated with the project.

There are more than 8,000 of those residents who are at risk of 24-hour exposure to the very harmful particulate matter from the diesel emissions, from both -- that is, both on-road and non-road sources associated with the project.

And so I would urge that the draft EIR analyze all possible technological solutions to reduce construction emissions.

In particular, I'd just like to suggest the analysis of diesel particulate filters, which have been shown to reduce carbon dioxide -- sorry -- carbon monoxide emissions by 60 percent, as well as reduce the emission of other toxins.

In addition, I would also urge the analysis of a selective catalytic reduction system on the

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construction emissions.

I'd like to turn now to the second point, which relates to energy.

As many of you know, it's quite hot.

And yesterday the news reported that energy consumption in the state exceeded the all-time record.

I think it's probably, then, an appropriate time to note that the draft EIR report contains no dedicated analysis of the energy consumption impacts of the project.

I think that's a pretty significant oversight.

The draft EIR does contain a handful of mitigation measures related to energy, and those are important.

But this really is a flagship project to the City of Los Angeles, and I think we ought to be able to say that we have fully analyzed the environmental impacts, particularly the energy impacts, and this project, and we can really call it a green building.

In that respect, I would urge the analysis of the LEAD standards, the Leadership Energy and Environmental Design standards.

And it would be really wonderful if we could call the Grand Avenue project a LEAD-certified building.

And right now there is no analysis that would

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enable us to do that.

The city itself has already committed itself to the LEAD standards.

The city itself has a LEAD ordinance that applies to the Department of Water and Power new construction buildings.

There is also a bill before the city council right now that would require the study of -- requiring all leased projects from the City to be LEAD certified.

And this is, in fact, a project on city land.

So that's exactly the direction that the city is moving in.

And that's the direction the project should be moving in as well -- it should be a LEAD certified project. And we'd love to see that.

And the reason we are talking about that, what the prior testimony has indicated is we are really talking about the human impact.

And LEAD-certified buildings have a great capacity to reduce the heat island effect, which has been recognized by the City's Environmental Affairs Department.

And that -- the heat island effect -- is something that really, truly impacts, particularly the homeless population in downtown, who has to live with

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three to ten degree increases in heat in their very own home. That you, very much.

MR. LACKOW: Thank you, Mr. Beach. The last speaker card I have before me is Esther Alejandro.

And in the spirit of equal opportunity --

MS. ALEJANDRO: That's okay. I'll manage.

Good evening. My name is Esther Alejandro, and I'm also a member of LA CAN, and a resident of a downtown area.

And what I would like to comment is the need for local hiring measures to reduce emissions impact.

There again we have it.

One way to reduce the emissions and traffic impact of construction is to ensure that the individuals employed during construction already live near the project.

The draft EIR projects that there will be 250 to 600 construction workers on site per day -- that's page 21 -- for many parts of the region -- page 56.

There is no suggestion that any number of downtown nor near-by residents will be among those working construction.

That means lots of lengthy commutes by car in heavy traffic.

The authorities should consider an aggressive local hiring program for construction as a mitigation measure to correct this problem.

The EIR and actions by government always seem solely focused on bringing people in to live where they work.

But equally important, current downtown residents would like to work where they actually live. Thank you.

MR. LACKOW: Thank you, very much. Is there anybody else who would like to speak tonight? Okay.

Not seeing anybody raising a hand or stepping forward, I think what we will do then is we will close the public meeting --

Yes, sir? Could you please fill out a speaker card?

You can do it after you speak. Sorry for that. Trying to move it along a little bit.

MR. TORRES: My name is Benjamin Torres. I live downtown.

And I just want to make a note that the impact this project would potentially have on my situation and living condition in terms of I make a pretty good salary and live in downtown.

But as a result of these type of projects where, you know, money is not set aside or planning not done in a way that looks at what kind of impact does it have on working poor or homeless folks -- myself who makes a middle class salary will have to move out of downtown because I will not be able to afford to live downtown.

And I'm a single man. Imagine what's going to happen to families.

So the EIR has to look at what impact it's going to have on families in the downtown corridor.

This is a great project potentially having a lot of beautiful opportunities for the downtown residents, but if those folks have to leave because they can't afford to live in the area as a result of projects like this -- there is no mitigation and no jobs, then the people can't afford to go to these kind of shopping centers, et cetera, and retail spaces -- then we are going to have a serious hollowing out of downtown similar to the one we had in South Central Los Angeles and other areas because people moved out of the area because they could not afford to live there.

And then we'll have the repercussions of violence and other types of activities -- increase in gangs and, you know, basically the loss of social capital in the community where people can actually contribute to change and be a part of the transition process to really make downtown a liveable place for everyone.

So that's just kind of a personal note I want to mention.

MR. LACKOW: Thank you, very much. If you could fill out a speaker card.

Okay. Is there anybody else who would like to

say a few words this evening?

Okay. Not seeing any, I think we will close the public meeting for night.

I will close it by saying that once again the deadline for submitting your comments, either by E-mail or by writing, is August 3rd of 2006.

Please be advised that if you ask a question of any of the representatives who made presentations tonight, that does not constitute a comment that will be responded to in the final EIR.

Please give us everything in writing. We want to make this as open and democratic a process as we possibly can.

Thank you, very much.

(Whereupon, at 7:08 p.m., the meeting was adjourned.)

0057

CERTIFICATE OF REPORTER

I, Catherine Ponicsan, R.P.R., C.S.R. No. 8271, do hereby certify:

That the foregoing proceedings were taken down by me in shorthand at the time and place therein named and was hereafter reduced to typewriting under my supervision; that this transcript is a true record of the proceedings and all public comments made, and contains a full, true and correct report of the proceedings which took place at the time and place set forth in the caption hereto as shown by my original stenographic notes.

I further certify that I have no interest in the event of the action.

WITNESS my hand this 31st day of July, 2006.

_____

C.S.R. No. 8271

(Certified Transcript Requires Original Signature of Reporter)

**Tracking Number:**

**THE LOS ANGELES GRAND AVENUE AUTHORITY**
**CALIFORNIA ENVIRONMENTAL QUALITY ACT**
**DRAFT ENVIRONMENTAL IMPACT REPORT FOR**
**THE GRAND AVENUE PROJECT**

# *COMMENT FORM*

**COMMENT AUTHOR** *(Please print.)*

**Name** *(Last, First or Org.)*: Chor, Tay – Montebello Bus Lines | **Date:** 7/18/06

**Address:** 406 S. Taylor Ave

**City:** Montebello | **State:** CA | **Zip Code:** 90640

**Comment(s):**

Please address the following concerns:

1. What is the notification process for construction? We will need minimum of 72 hours to make detours for our bus routes.

2. What is the expected duration of the construction?

*Attach additional sheets if necessary.*

**Please submit comments by August 3, 2006 to:**
**The Los Angeles Grand Avenue Authority**
**c/o California Community Foundation**
**445 South Figueroa Street, Suite 3400**
**Los Angeles, CA 90071**